



June 26, 2024

Honorable Tina McKinnor
California State Assembly
1021 O Street, Suite 5520
Sacramento, CA 95814

Re: AB 2797 (McKinnor) – Oppose

Dear Assemblymember McKinnor:

The Public Advocates Office is the independent consumer advocate at the California Public Utilities Commission (CPUC). We advocate for affordable, safe, and reliable utility services consistent with the state's climate and clean energy goals.

We share your concerns regarding the need to transition customers to modern network technology. Customers, no matter where they live, should have access to safe, reliable, high-quality, and affordable broadband service. However, AB 2797 is premature because it would allow all carriers to withdraw from their Carrier of Last Resort (COLR) obligations before important policy issues are addressed that arise from transitioning away from legacy communication systems, such as copper-based landline service, to broadband service.

Many residences, businesses, and other organizations still rely on copper-based service, including those that provide emergency assistance and other safety-related services. Additionally, low-income customers and other vulnerable populations may be affected if bill discounts provided by the Lifeline program are revoked. Carriers who bear the COLR obligations are required to offer the LifeLine program to their customers, which many low-income customers rely on. In fact, there are 1.4 million Californians that currently participate in the California LifeLine program, with AT&T serving approximately 85,000 of those participants. Before removing COLR obligations, we must first ensure no one is left behind and that public health and safety are not jeopardized.

On June 20, 2024, the CPUC opened a rulemaking that will address important policy issues regarding the transition to modern communications systems, including assessing the need to update COLR rules and guidelines. The CPUC's rulemaking provides a public and transparent process to best ensure that customers – especially vulnerable customers such as those that are low-income, people with disabilities, customers located in high-fire threat areas and rural communities – are not at risk of losing access to essential communications services. AB 2797 would prevent this public discourse and deliberation.

Sincerely,

Linda Serizawa
Interim Director