

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Sequoia Wireless, Llc**  
**CER (Corp ID 4565)**  
**Status of Advice Letter 8**  
**As of April 30, 2024**

Subject: Notification of legal entity name change and updated list of names doing business under

Division Assigned: Telecommunications

Date Filed: 04-02-2024

Date to Calendar: 04-08-2024

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>04-02-2024</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

TD.\_PAL@cpuc.ca.gov

AL Certificate Contact Information:

Indy Nelson

510-342-6503

indy@sequoiawireless.com

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Telecommunications Carrier Filing Advice Letter

From: Telecommunications Division PAL Coordinator

Subject: Your Advice Letter Filing

The Telecommunications Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

Advice Letter Number

Name of Filer

CPUC Corporate ID number of Filer

Subject of Filing

Date Filed

Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)

Effective Date of Filing

Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Telecommunications Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Telecommunications Division staff based on the information contained in the Telecommunications Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Telecommunications Division PAL Coordinator by e-mail to  
***td.\_pal@cpuc.ca.gov***

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

**VIA ELECTRONIC FILING (EMAIL)**

June 7, 2023

Join LifeLine, LLC  
Indy Nelson, CEO  
29034 Westbourne Court  
Hayward, CA, 94544  
[indy@joinlifeline.org](mailto:indy@joinlifeline.org)

**Re: Wireless Identification Registration Approval of Join LifeLine, LLC (U-4565-C)**

Dear Indy Nelson:

On April 23, 2023, the Communications Division (CD) of the California Public Utilities Commission (CPUC or Commission) received a Wireless Identification Registration (WIR) form from Join LifeLine, LLC, also dba Join ACP (Join LifeLine) requesting approval to offer resold Commercial Mobile Radiotelephone Service (CMRS) (wireless service) in California. CD finds that the wireless registration information provided meets the filing requirements as set forth by the CPUC in Decision (D.) 94-10-031 and modified by D.94-12-042. Accordingly, Join LifeLine is issued WIR number U-4565-C.

Join LifeLine may begin to provide resold wireless services to the public in California. As a registered wireless service provider, Join LifeLine is a telephone corporation as defined by Public (Pub.) Utilities (Util.) Code Section 234, and must comply with all CPUC requirements including, but not limited to, the following:

- 1. Identification of Registration** – Join LifeLine shall include its WIR number in the caption and title of all filings with the CPUC.
- 2. Commencement of Service Notification** – Within five days after service begins, Join LifeLine shall notify the Director of CD at [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov) in writing of the date that service was first rendered to the public, as authorized herein. If Join LifeLine does not commence operations within 12 months after the date of this letter, the WIR and authority to render wireless telecommunications service will expire by operation of law.
- 3. Surcharges and User Fees** – Join LifeLine is subject to the following California public purpose program surcharges and user fees identified below that must be regularly remitted using the CPUC's proprietary Telecommunications and User Fee Filing System (TUFFS). Pursuant to Decision (D.) 22-10-021, effective April 1, 2023, all telephone corporations operating in California shall assess, collect, and remit public purpose program surcharges pursuant to the access line flat rate surcharge

mechanism. User fees shall continue to be assessed and collected based on intrastate telecommunications revenues.

- a. The Universal Lifeline Telephone Service Trust Administrative Committee Fund (Pub. Util. Code § 277);
  - b. The California Relay Service and Communications Devices Fund (Pub. Util. Code § 2881; D.98-12-073);
  - c. The California High Cost Fund-A (Pub. Util. Code § 275.6); D.96-10-066, at 3-4, App. B, Rule 1.C);
  - d. The California High Cost Fund-B (Pub. Util. Code § 276.5), D.96-10-066, at 191, App. B, Rule 6.F.; D.07-12-054);
  - e. The California Advanced Services Fund (Pub. Util. Code § 281; D.07-12-054);
  - f. The California Teleconnect Fund (Pub. Util. Code § 280; D.96-10-066, at 88, App. B, Rule 8.G); and
  - g. The User Fee provided in Pub. Util. Code §§ 431-435. The minimum annual User Fee is \$100, as set forth in D.13-05-035.
4. **Access to TUFFS** - CD shall issue a compliance directive to the Join LifeLine primary regulatory contact, providing directions for reporting and remitting of public purpose program surcharges and the user fees through TUFFS. Additional information about telecommunications surcharges and user fees is available from the CPUC website: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees>.
  5. **Surcharges Filing** - Join LifeLine shall report its number of access lines and remit the resulting public purpose program surcharges through TUFFS even if there is zero (0) access lines to report and zero (0) resulting surcharges to remit. Send an email to [Telcosurcharge@cpuc.ca.gov](mailto:Telcosurcharge@cpuc.ca.gov) for questions related to surcharges and access to TUFFS. Current and historical surcharge rates can be found at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees/surcharge-rates>.
  6. **User Fee Filing** - Join LifeLine shall report and remit the user fees based on a standard user fee remittance rate applied to the gross intrastate revenue or an annual minimum user fee of \$100, whichever is greater. The user fee remittance rate is determined annually by the Commission and posted on the Commission's webpage. The reporting and remittance of user fees must be through TUFFS within 15 days after the end of each calendar quarter (March 31, June 30 and September 30, and December 31) or January 15th due date for those paying the annual minimum user fee of \$100. TUFFS will automatically adjust the minimum user fee amount due to \$100 when the annual gross intrastate revenue is zero (\$0) or less than the annual minimum user fee of \$100. Under Pub. Util. Code § 405, carriers that are in default of reporting and submitting user fees more than 30 days after the quarterly

user fee payment due dates of April 15<sup>th</sup>, July 15<sup>th</sup>, October 15<sup>th</sup>, and January 15<sup>th</sup>, or more than 30 days after the January 15<sup>th</sup> due date for those utilities paying the annual minimum user fee of \$100, will be subject to automatic penalties including suspension or revocation of their authority to operate in California. Send an email to [userfees@cpuc.ca.gov](mailto:userfees@cpuc.ca.gov) for questions related to user fees. Current and historical user fee rates can be found at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees/user-fee-rates>.

7. **Performance Bond** – Pursuant to D.13-05-035, Join LifeLine must obtain a performance bond in the amount of \$25,000. In the affidavit included in its application, Join LifeLine attested to the amount of the bond that will be obtained and that the required performance bond will be executed within five business days after the effective date of the issuance of a registration. The performance bond must be a continuous bond (i.e., there is no termination date on the bond) issued by a corporate surety company authorized to transact surety business in California, and the CPUC must be listed as the obligee on the bond. Join LifeLine must submit a Tier-1 Advice Letter to CD, containing a copy of the license holder’s executed bond, and submit a Tier-1 advice letter annually, but not later than March 31, with a copy of the executed bond. Pursuant to Decision 13-05-035, the Commission may issue a citation and/or revoke the wireless authority if it is more than 120 days late in providing CD a copy of its executed performance bond and the carrier has not been granted an extension of time by the Director of CD or its designee. Additional information is available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/performance-bond-requirements>.
8. **Employee Identification Cards** – Within 60 days of the issuance of this WIR, Join LifeLine shall comply with Pub. Util. Code Section 708, Employee Identification Cards, and confirm in writing to the Director of CD at [CDcompliance@cpuc.ca.gov](mailto:CDcompliance@cpuc.ca.gov), that this requirement been met.
9. **Regulatory and Official Contact Information** – Join LifeLine shall provide CD the name(s), address(es), email address, and telephone number(s) of its designated primary regulatory/official contact persons(s). This information must be provided electronically, using the “Contact Information Update Request” form<sup>1</sup> found at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone> under Service Provider Requirements and Programs. This information must be updated if the name(s), address(es), and telephone number(s) change, or at least annually by June 1 of each calendar year.
10. **Customer Service Contact Information** – Join LifeLine is subject to the jurisdiction of the CPUC for the resolution of customer complaints. Prior to initiating service, Join LifeLine must provide the CPUC’s Consumer Affairs Branch (CAB) with the

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<sup>1</sup> <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/licensing-compliance/contact-information-update-request-form.pdf>

name and corresponding telephone number of the designated contact person(s) for purposes of resolving consumer complaints. This information must be provided electronically, using the “Contact Information Update Request” form found at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone> under Service Provider Requirements and Programs. This information must be updated if the name(s), address(es), and telephone number(s) change, or at least annually by June 1 of each calendar year.

- 11. Notification to the CPUC** – Join LifeLine shall notify in writing with the Director of CD at [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov) of any changes to the information it submitted for wireless registration within 30 days of the affected change. This information does not have to be served on competitors, cities, and counties.
- 12. Affiliate Transaction Report Filing** – Join LifeLine shall file an annual affiliate transaction report with the Director of CD at [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov), in compliance with D.93-02-019, on a calendar year basis, using the prescribed form<sup>2</sup> available from the Commission website. The report is due on May 1st of the year following the calendar year for which the report is submitted. Additional information is available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/annual-report-forms>.
- 13. Failure to Comply** – If Join LifeLine is 90 days or more late in complying with its reporting obligations to the Commission including but not limited to filing its annual Affiliate Transaction Reports, Performance Bond obligation, and surcharges and user fees; and has not received written permission from the Commission or CD to file, report or remit late, CD shall issue a citation pursuant to Resolution T-17601. Failure to comply with the issued citation or timely appeal the citation may result in a revocation of its wireless registration approval and/or a referral to the CPUC Consumer Protection and Enforcement Division (CPED) for enforcement action, which could result in additional fines, penalties, or other sanctions.

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<sup>2</sup> [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/licensing-compliance/annual-reporting-requirements/annual-affiliate-transaction-report-form\\_.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/licensing-compliance/annual-reporting-requirements/annual-affiliate-transaction-report-form_.pdf)

Consistent with D.85-07-081 and D.85-11-044, registrant shall be granted a waiver of Pub. Util. Code Sections 816-830 and 851-855. The Pub. Util. Codes are available at: <http://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC>

If you have any questions regarding this letter, please contact Jim Hyden at 415-703-3362 or via e-mail at [James.Hyden@cpuc.ca.gov](mailto:James.Hyden@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Osborn". The signature is fluid and cursive, with a large initial "R" and "O".

Robert Osborn  
Director, Communications Division  
California Public Utilities Commission