Boost/CARE Pilot Evaluation Report FILED

Communications Division, LifeLife Group

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Executive Summary:

The Boost/CARE Pilot launched in July 2019 and is authorized to operate until July 2021. This Evaluation Report summarizes the activities undertaken in the first year of the Boost/CARE pilot program, the data collected on pilot participation and data usage during that time, and some of the lessons that the Commission has learned and recommendations for the pilot's future. The iFoster Pilot authorized in the same Decision will be the subject of a separate Evaluation Report.

The goal of the pilot program is to increase participation in the California LifeLine Program by underserved and unserved populations by testing new and innovative strategies and government partnerships¹.

The Boost/CARE pilot is designed to meet the four goals of the pilot program² 1) lower barriers of entry and streamlining eligibility 2) Increase overall participation rate in the Program 3) encourage Program participation by Facilities Based Service Providers and participant access to widely available retail offerings in the mass communications market and 4) provide scalable solutions that may be adopted by other target markets in the future. Under the CARE Pilot, Boost Mobile offers households a discount on retail plans with features like unlimited data and family-plan discounts that are not offered by existing LifeLine carriers.

Recommendations:

1. Staff recommends the Commission conclude the CARE Pilot because it did not meet the goals of the pilot program or its stated objectives. Although the Commission gained new partnerships and tested new procedures that may prove useful elsewhere in the LifeLine Program, the Pilot did not meaningfully increase participation in LifeLine. The Pilot target participation was estimated at 350,000, however no more than 5,000-6,000 households participated in the Pilot at any time. Further, the Pilot participants were overwhelmingly pre-existing Boost customers applying discounts to the same plans they were already paying full price for before the Pilot. It is also unclear whether those households are representative of other low-income households.

¹ Decision 18-12-019

² Decision 19-04-021

- 2. We also recommend the Commission require Boost/T-Mobile to implement a detailed transition plan within 30 days from a final Commission decision. The implementation plan should include:
 - Notice of termination date of the pilot.
 - A list of public assistance programs that qualify for the CA LifeLine program.
 - A link to the CA LifeLine webpage which provides customers with information of the program, eligibility criteria, and a list of LifeLine Service Providers in their service territory.
 - A contact number that participants can call for any questions.

Boost/T-Mobile should notice their customers with the implementation plan 30 days prior to the end date of the pilot program.

- 3. We also recommend the Commission Implement the following Key Elements in future pilot programs:
 - Devise and distribute marketing materials from a trusted source or sources.
 - Plan for and establish adequate infrastructure and staffing to effectively implement categorical eligibility determination.
 - Streamline, and if possible, automate the collection and analysis of participant statistics.
 - Include in the Pilot design, a framework for the Commission to conduct regular assessments of the Pilot operations and participant satisfaction, and as needed, implement incremental changes to re-align Pilot activities with its objectives.
 - Consider the personnel and resource needs to implement Pilots as part of the Pilot approval process.
 - Pre-determine who will perform the role of the administrator and how they will be paid for their work.

I. Introduction and Background

A. Authorizing Decisions

Decision (D.) 18-12-019, issued on December 13, 2018, established the criteria for pilot programs and partnerships within the California Lifeline Program. The Commission's goal with the Program is to develop and test strategies to increase participation in the California LifeLine Program by underserved and unserved populations through pilot programs and partnerships with government agencies.

On April 25, 2019, the Commission adopted D. 19-04-021 authorizing two pilot programs: The Boost/CARE Pilot and the iFoster Pilot.

B. Pilot Design and Objectives:

Target Market

The Boost/CARE Pilot provides monthly \$15 discounts on any wireless phone service from Boost Mobile to any households enrolled in the California Alternative Rates for Energy (CARE) program. The CARE program is a rate discount program authorized by CPUC decisions and supporting legislation which provides rate discounts in the range of 30-35 percent to qualifying low- income participant households on electricity bills and 20 percent on natural gas bills. Both the large investor-owned utilities (IOUs) and smaller multi-jurisdictional utilities (SMJUs) in California are required to maintain CARE or similar programs to assist qualifying low-income residents. CARE is funded by non-participating utility customers through a Public Purpose Program charge on ratepayer energy bills.

The eligibility criteria for CARE (\$52,400 for a household of 4) are less restrictive than the income-eligibility criteria for LifeLine (\$39,700 for a household of 4). However, the Legislature and the Commission consider CARE participants as low–income households deserving of financial support to lower the cost of their energy bills and were identified in D.18-12-019.

The Pilot is authorized to provide \$15 monthly discounts on any service plan from Boost Mobile to up to 350,000 participants for up to 24 months, for a total cost of \$126 million. Boost receives reimbursement for the \$15 discount applied monthly to each Pilot participant's account. Boost is not reimbursed for any operating costs.

C. Consumer Outreach:

Postcards

The Boost/CARE Pilot launched in July 2019 with a postcard mailing campaign targeting over 4.3 million households receiving CARE recipients. Consumer names, addresses and counties where they lived were provided by Pacific Gas & Electric (PG&E), Southern California Edison (SCE), SoCal Gas, and San Diego Gas & Electric (SDG&E).

The Communications Division (CD) staff compiled a database of these CARE recipients and removed duplicates to avoid sending two postcards to households with different gas and electric providers. Staff created a postcard template (see Figure: 1), which informed recipients that there were other low-cost and no-cost plans available through the LifeLine Program and directed them to a website where they could learn more. The postcards also contained all the information (name, address, promotional code) that the recipient would need to show a Boost Mobile employee to sign up for the discount, and instructions on how to do so.

Staff created a .csv file for every county containing each eligible household's name and address and a unique, randomized promotional code assigned by staff. Due to delays in the contracting process with the Office of State Publishing, staff printed and mailed the first three counties (Sonoma, Santa Barbara, and Contra Costa) themselves. Thereafter, staff sent .csv files to the Office of State Publishing, who printed each name, address, and promotional code onto a

postcard and mailed them out, one county at a time, as shown in Figure 1: Postcard Template,

Front and Back.

FRONT

You Are Eligible For A Monthly \$15 Discount With Boost Mobile



The California LifeLine Program gives discounts on home and cell phone service to lower the cost of phone bills. We partnered with Boost Mobile to give CARE participants a monthly \$15 discount towards Boost Mobile prepaid service plans. There are other low or no-cost options from other phone companies. Learn more at hellosavings.org.

Bring this postcard to a Boost Mobile store. Your Boost Mobile account must match the name, address, and promo code on this postcard. Be ready to provide the California LifeLine Program with a copy of your energy bill. Must redeem promo code by 10/31/19. This is a limited duration pilot.

PROMO CODE:



New and Existing Boost Customers: Promo Code for In-Store Use Only. To find your nearest participating Boost Retailer, go to boostmobile.com dick 'Find a Store', enter a zip code, click 'filter by locations that offer', and then select 'Phones'. Program participant pays full price 1st mo, then \$15/mo. account credit begins 2nd month pending completion of validation process.

Credit is not transferable & not redeemable for cash or merchandise. Must pay 1st month at activation. This promo code can only be applied to one phone line. If you have a family plan, each discount will be applied to the primary accountholder. Discounts cannot be combined with other Boost rate plan offers. Customer responsible for any incremental/addl charges beyond basic monthly service. Boost and California LifeLine Program reserve the right to change or cancel offer at any time. \$15 will be applied as an account credit. Purchasing add-ons and extras will draw down this credit and may impact your monthly payment and account standing.

Dealer Action: Promo Code must be associated to customer account during activation through the ePay WebPOS. Visit Training folder on Sales Portal for detailed Step Action Guide for existing customer process and additional details.

BACK

"HELLO, SAVINGS!" "¡HOLA, AHORROS!"



Los participantes del Programa CARE pueden tener un descuento de 15 dólares mensuales para los planes de servicio prepago de Boost Mobile. Obtenga más información en www.hellosavings.org.

FIRST NAME LAST NAME

NUMBER STREET APT NUMBER

CITY NAME, CA #####

Fresno State Connect

D. 19-04-021 authorized \$6M to be used for CARE participant outreach. On December 19, 2019, the Commission contracted with Fresno State Connect, a call-center operated by California State University Fresno's Office of Community and Economic Development ("Fresno"), to answer inbound calls about the Pilot and conduct marketing and outreach activities. Fresno State Connect will receive up to \$800,000 to contact up to 350,000 qualified households for the Pilot. Their responsibilities include providing promotional codes to households who are eligible for the Pilot, verifying participants' eligibility for the Pilot by receiving CARE-discounted energy bills and responding to consumer questions about the discount program. Beginning in March 2020 to December 2020, Fresno State Connect initiated 296,913 outbound outreach calls, responded to 5,041 inbound calls from participants or potential participants and initiating or responding to 4,745 texts, SMS and email messages.

Boost Mobile

Boost Mobile retail stores offered an in-person enrollment experience for CARE consumers who were interested in redeeming the promotional code they received via mail or phone call for a \$15 monthly discount. Boost retail staff were trained on the Pilot program features and enrollment process from educational and training materials jointly developed by Boost and the Commission. Boost Mobile's website contained additional information promoting and explaining the Pilot.

D. Boost Prepaid Plans Available to Consumers:

Most Pilot participants were Boost customers before the launch of the Pilot, and Boost Mobile frequently changes its offerings, it is impractical to list the details of the over 50 iterations of similar plans involved in the Boost/CARE Pilot. However, the details of the Boost Mobile plans currently available to all new and existing customers are listed below. Prices listed are Boost's regular retail rates, before the \$15/month credit is applied (so the \$35/month plan would cost a Pilot participant \$20/month).

Limited Data Plans:

- \$35/month: Unlimited talk and texts and 3GB of 4G LTE data per month, plus mobile hotspot functionality, using the same 3GB of 4G LTE data.
- \$35-\$45/month: Unlimited talk and texts and 10GB of 4G LTE data per month, plus mobile hotspot functionality using the same 10GB of 4G LTE data. Price starts at \$45/month but falls to \$35/month after 6 months of on-time payments.

Unlimited Data Plans:

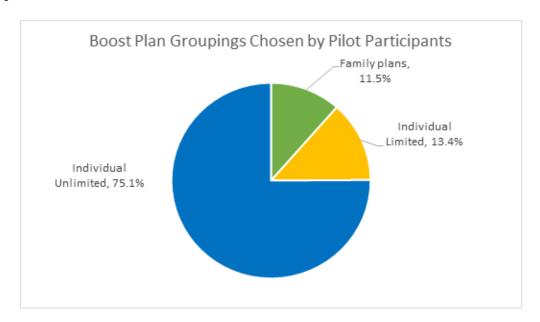
- \$50/month: Unlimited talk and texts, 35GB of 4G LTE data, unlimited data at 2G speeds, unlimited standard definition streaming of music and videos from approved partners, 12GB of Mobile Hotspot data.
- \$60/month: Unlimited talk and texts, and 35GB of 4G LTE data, unlimited data at 2G speeds, unlimited high-definition streaming of music and videos from approved partners, 30GB of Mobile Hotspot data.

Family Plan Discounts:

- \$35/month + \$30/additional line (up to 5): Unlimited talk and texts and 3GB of 4G LTE data, plus mobile hotspot functionality, using the same 3GB of 4G LTE data. Unlimited data at 2G speeds.
- o Additional lines can be added to the \$50/month unlimited plan for \$30/month.
- Additional lines can be added to the \$60/month unlimited plan for \$40/month.

The plans offered and selected can be summarized as belonging to the following three groupings: Family Plans (11.4%), Individual Unlimited Plans (75.1%), and Individual Limited Plans (13.4%). Of the Family Plans, at least 54.2% had unlimited data. Staff notes that Family Plans can have up to 5 lines on a single account with a single \$15 discount, and likely benefited significantly more than 11.4% of all Pilot participants. Staff also notes that only 13.4% of plans were comparable to the individual plans with limited amounts of high-speed data that are typically provided by LifeLine. Summarized consumer plan choices are shown below in Figure 2: Service Plan Choices.

Figure 2: Service Plan Choices



II. Pilot Operations and Management:

A. Carrier Responsibilities

In addition to Boost offering a in-store enrollments, Boost assisted consumers with plan and devices selections. In the background, Boost/Sprint also provided a dedicated operations team to support and implement the discount on the consumer accounts, troubleshoot any activation or account problems and prepared for the Commission's monthly reporting detailing consumer information about device and plan choices, data usage, and other information data upon request.

B. CPUC Operations and Management

CPUC staff provided oversight of the Pilot program and facilitated issue resolution on a variety of operational and administrative issues including:

- Overall administrator of the Pilot
- Participated in bi-weekly operations and status meetings with Boost Mobile
- Facilitated the administrative and operational solutions that were required of a new and dynamic program including escalated participant complaints.
- Collected from and analyzed Boost and Fresno State Connect Pilot monthly and quarterly participant data.
- Maintained a database of over 34 million CARE recipients, created mailing lists for the Office of State Publishing and prepared "call lists" for Fresno State Connect Call Center outreach.
- Performed budget and contract management activities including reviewing and processing monthly invoices from Boost Mobile and Fresno State Connect.

- o Reviewed, interpreted, and revised contracts as needed.
- Prepared updated and ad hoc reports for the Commission, the ULTS-AC Committee and interested outside parties.

C. Fresno Responsibilities

In addition to Participant outreach, CSU Fresno is responsible for the Boost/CARE Pilot eligibility verification. The CPUC staff prepares a list of the consumers that are eligible for the promotional discount.

CSU Fresno (or CPUC staff) asks for a photo or a copy of a participant's energy bill showing the CARE discount. CSU Fresno checks eligibility for all of the consumers in the consumer list that the CPUC provides, by requesting a photo or copy of a consumer's energy bill showing the CARE discount. The eligibility verification function may also be performed by CPUC staff. CSU Fresno (and CPUC staff) retains all of the documentation that the consumer provides.

III. Evaluation and Analysis

A. Authorized Budget

The budget for the Pilot included the estimated cost for: 1) reimbursing Boost for a \$15 monthly discount on participant plans 2) CPUC to produce and mail promotional code postcards to CARE participants and 3) a contract with CSU Fresno for call center outreach activities. Figure 3: Boost/CARE Pilot Budget vs Actual Expenses – July 2019 to August 2020 lists the budget, expense, and remaining budget for Boost Mobile, CSU Fresno and CPUC activities.

Figure 3: Boost/CARE Pilot Budget vs Expenses

Boost/CARE Pilot Budget vs Actual Expenses July 2019 to August 2020									
Expense Item		Budget		Expense		Remaining Budget			
Outreach	\$	6,000,000	\$	2,379,127	\$	3,620,873			
Postcards & Mailing	\$	5,200,000	\$	2,060,000	\$	3,140,000			
CSU Fresno	\$	800,000	\$	319,127	\$	480,873			
Boost/Mobile Claims	\$	126,000,000	\$	701,790	\$	125,298,210			
Total Operating Expenses	\$	132,000,000	\$	3,080,917	\$	128,919,083			

The CPUC budgeted \$6,000,000 for the production and mailing of the promotional code postcards to the CARE target population and for CSU Fresno call center activities. \$2,060,000 was

spent on postcard production and mailing. There was no additional cost for energy utilities' activities related to sharing consumer data. ³

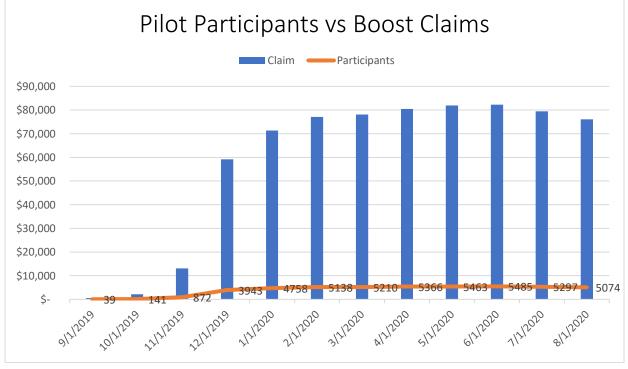
B. CSU Fresno

CSU Fresno call center executed a 12-month \$800,000 contract with the Commission in August 2019, but work did not begin until January 2020. As of August 1, 2020, total expenditures were \$319,127. The contract was scheduled to end on February 1, 2021 but was extended until the end of June 2021 or until the funds are used, which-ever is earlier. The remaining budget balance for all Outreach activities as of August 1, 2020 is \$3,620,873.

The Pilot is authorized to provide discounts on Boost Mobile service plans to up to 350,000 CARE consumers for up to 24 months, for a total cost of \$126 million. Boost is reimbursed \$15 per month for each active service plan. Boost is not reimbursed for their operational costs to implement the Pilot program. Expenses for Boost Mobile for the first year of the Pilot from July 2019 to August 2020 was \$701,790. The remaining budget balance as of August 1, 2020 was \$125,298,210.

As shown in figure 4: Pilot Participants vs Boost Claims, participation in the Pilot was much lower than projected which reduced the amount spent on participant subsidies. As a result, less than \$1 million of the \$125 million Boost subsidy budget was spent.





³ D. 19-04-021 see 3.1.2 Boost Pilot Program Budget

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C. Cost Analysis

The Decision projected up to 350,000 consumers would participant in the program. However, at the end of the first 12 months in August of 2020, participation was only 1.3% (4,507 consumers) of the expected target population.

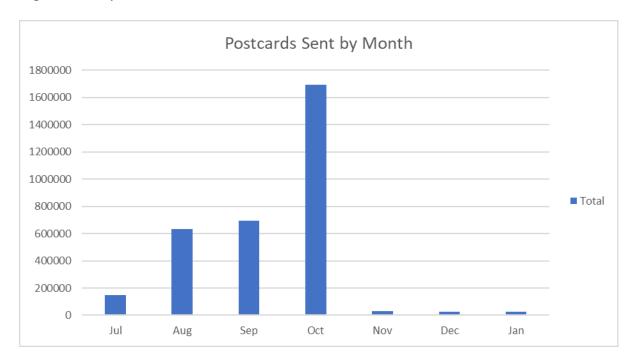
For the first year of the Pilot, the combined expense of the Boost Mobile discount reimbursement and Outreach activities was \$3,080,917. Using the August 2020 participation rate of 4,507, the average cost per participant was \$684.

D. Key Challenges

a. Participant Outreach Methodology – Direct Mail

Comments received by call center representatives, Boost employees, and Commission staff indicated the postcard and supporting website created by the Commission failed to persuade consumers of the legitimacy of the Pilot program.

Staff mailed over 3 million postcards during the seven months between July of 2019 and January of 2020, however response to the direct mail marketing was and remains low. Activation of the discount offer peaked at 5,485 accounts per month and continues to decline. As shown below in Figure 5: Postcards Mailed by Month (all counties) 2019 -2010 and Figure 6: Postcards Mailed by County by Month 2019 – 2020, The highest number of postcards sent were in October 2019 (approximately 1.7 million) and of those, more than 1.2 million postcards were sent to Los Angeles County. Figure 5: Postcards Mailed by Month (all counties) 2019 - 2020



Timeline of Postcards Sent 1.2 0.8 0.6 Placer Kern Tulare Marin Contra Costa San Luis Obispo San Mateo Sacramento Alameda Yolo Los Angeles San Bernardino Sonoma Santa Barbara

Figure 6: Postcards Mailed by County by Month 2019 -2020

b. Fresno State Connect

Aug-19

Jul-19

Fresno State Connect participant outreach and support services were delayed for five months after the launch of the Pilot until January 2020 limiting participant access to Pilot outreach and support services.

Oct-19

Nov-19

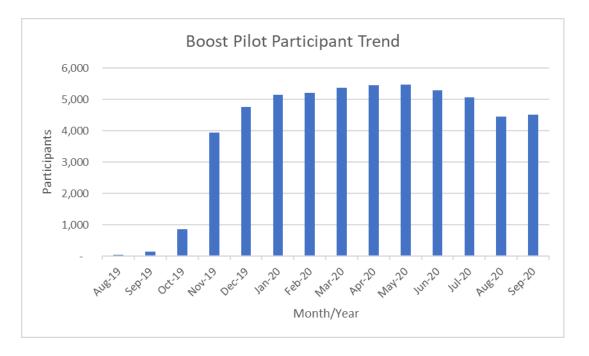
Dec- Jan-

Sep-19

Staff visited Fresno and began developing a contract in June of 2019. Unfortunately, due to delays in the contracting process, work could not begin until January of 2020. During the intervening months, Pilot participants could not call for help, and emails to staff about enrolling in the Pilot were not responded to in a timely fashion.

Although Fresno State Connect made 137,160, outbound calls between March 2019 and July of 2020, as well as 2,738 inbound calls, 2,3767 texts, and 924 emails, the response rate to the Boost/CARE Pilot marketing effort remains very low and well below the 350,000 authorized target population. Participation continues to decline, averaging less than 5,000 per month as shown in Figure 7: CARE Pilot Participation by Month 2019-2020.

Figure 7: CARE Pilot Participation by Month 2019 - 2020



c. Operational Complexity

Another challenge was that the Pilot was difficult to administer and required at least 1.25 person years to perform a variety of tasks, including.

- Secure collection, database management and distribution of CARE customer data from the utility IOUs for participant outreach postcard mailings and to populate the Fresno call center data base for making consumer outreach calls.
- Participant eligibility verification by the Fresno call center or the Commission requesting a copy of the consumer's energy bill showing the CARE discount.
- Troubleshooting consumer issues/problems typically related to a consumer never receiving the \$15 discount or the discount "falling off" a consumers account for no obvious reason.
- Investigating or reinstating consumer discounts. When a consumer reported they
 never received or stopped receiving a discount after redeeming a \$15 promotional
 code, the Fresno call center or the CPUC staff would first, verify the consumer was
 eligible for the discount by confirming they were a CARE participant second,
 communicate the consumer information and issue to the Boost operations staff and
 lastly, maintaining a spreadsheet with a status of all escalated consumer issues
 relayed to Boost or the CPUC staff, and confirm the issue was resolved.
- Boost Operations Coordination
- Reviewing Boost monthly and quarterly consumer reports on usage, device choices, churn rate and other statistics.
- Preparing analysis of and recommendations for Decision modifications

Processing and monitoring monthly invoices for payments to Boost and CSU Fresno

d. Sprint/T-Mobile Merger:

In April 2020, Sprint and T-Mobile merged to create New T-Mobile and created additional operational challenges. One of the merger conditions imposed by the FCC and federal Department of Justice was that Sprint divest itself of Boost Mobile, by selling the brand and its customers to DISH, which is expected to become a new facilities-based competitor. The Commission requested and received an exemption from this divestiture for the Pilot in order to maintain seamless continuity for program participants. As a result, Pilot participants were kept on the Sprint network, which meant that their devices continued to function, uninterrupted, throughout the transition and pandemic. However, the Boost staff that had been working on the pilot were replaced with new staff from T-Mobile and DISH, and it took time to train them on the new and existing processes.

Also, when many of the Boost retail stores re-opened in the summer of 2020, it appeared they were no longer receiving updated and clear information about the Pilot procedures and their role in signing up Pilot participants. This created confusion for potential participants and reduced participation rates.

e. COVID-19:

The COVID-19 pandemic also affected participation rates. In response to the pandemic, most Boost retail stores were temporarily closed and consumer outreached and enrollment was transferred to the Fresno call center. Although participants could learn about the Pilot and redeem their discount by phone, it limited the ability to evaluate the benefit of an in-person enrollment experience. As a result, staff is not able to evaluate whether in-person, in-store enrollments improved participation rates in the LifeLine program.

IV. Participant Behavior

In addition to evaluating the success of the pilot, staff noted several trends specifically related to participant wireless plans and device preferences. Based on the behavior of the 5,000 – 6,000 participants in the CARE pilot, below is a summary of their preferences. Staff notes however, that the trends identified are based on a small segment of the CARE population and may not be reflective of the majority of LifeLine participants.

A. Plans

Approximately 89.6% of subscribers were existing Boost customers who applied the promotional \$15 discount to reduce the cost of plans that they had already been paying the full price for before receiving the discount offer. 10.4% were new Boost customers. Staff calculates that over 80% of all plans, family and individual, had unlimited data.

The Commission received anonymized usage data for talk, text, and data for the Pilot participants from Boost. On average, participants sent 457 texts per month, while the median participant sent 307 texts per month. On average, participants used 1,000 voice minutes per month, while the median participant used 696 voice minutes per month. For data usage, on average, consumers used 10GB of data per month, but this result is skewed by a small number of consumers using 100-250GB of data per month. The median participant used closer to 4GB of data, even on unlimited plans.

B. Devices

Of the participants, almost 95% of Pilot participants purchased new devices, and less than 5% of the participants brought their own devices. Less than 1% of participants bought refurbished devices. For the devices currently available on Boost Mobile's website, most handsets purchased cost at least \$352. For older devices no longer available through Boost Mobile, the average cost to replace the device with a new, unlocked phone on Amazon.com would be \$189.4 Although this cannot necessarily be generalized to other populations, the data show that the Boost Pilot participants were willing to pay hundreds of dollars for new devices. As shown on figure 8 - Handset Brands, participants overwhelmingly chose iPhones, Samsung Galaxies, and LG Stylos. Staff notes that although these devices were new to the consumer, they were usually not the latest generations of their respective brands – for example, most iPhones were iPhones 6 and 7.

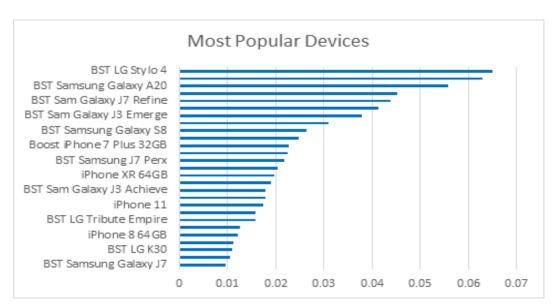


Figure 5: Handset Brands by Participants

⁴ These are staff's own calculations. Staff recorded the advertised price of devices currently available on Boost Mobile's online store. For devices that Boost no longer sells, staff recorded the price of a new, unlocked version of the device sold on Amazon.com. Staff assumes that the older devices that cost an average of \$189 today would have been more expensive at the time that they were purchased, due to the tendency of consumer electronics to decline in price overtime.

V. Lessons Learned:

A. CARE Pilot

- Roughly 90% of Pilot participants were pre-existing Boost customers.
- Participation rates were very low, and staff theorizes that the following may have been contributing factors:
 - o Inability to effectively implement Discounts which were "falling off" accounts early in the process, and inability of Boost/Sprint to resolve this issue.
 - Unsolicited direct mail typically has a low response rate.
 - The postcards and websites created by the Commission may have been insufficient to persuade consumers of the Pilot's legitimacy, given that the Pilot was an unconventional public-private partnership.
 - A 6-month evaluation may have focused attention on the low response rate early in the program and offer recommendations to resolve the problem.

B. CARE Pilot Participants

- Family plans are a common and desirable feature in the wireless market, especially for low-income households, and should be introduced to the LifeLine Program.
- Despite encouraging consumers to choose the cheapest plan that met their needs, over 80% of customers paid extra for unlimited data on their plans.

New smartphones are important to consumers, including the low-income population that LifeLine seeks to serve. On average, participants spent \$189-\$352 on their devices, far exceeding the value of the devices LifeLine carriers provide, or the least expensive devices available from Boost.

VI. Recommendations:

1. Pursuant to D. 19-04-021, we recommend the Commission conclude the CARE Pilot because it did not meet the goals of the pilot program or its stated objectives. Although the Commission gained new partnerships and tested new procedures that may prove useful elsewhere in the LifeLine Program, the Pilot did not meaningfully increase participation in LifeLine. The Pilot's goal was 350,000 participants however, no more than 5,000-6,000 households participated in the Pilot at any time. Further, the Pilot participants were overwhelmingly pre-existing Boost customers applying discounts to the same plans they were already paying full price for before the Pilot. It is also unclear whether those households are representative of other low-income households.

- 2. We also recommend the Commission require Boost/T-Mobile to implement a detailed transition plan within 30 days from a final Commission decision. The implementation plan should include:
 - Notice of termination date of the pilot.
 - A list of public assistance programs that qualify for the CA LifeLine program.
 - A link to the CA LifeLine webpage which provides customers with information of the program, eligibility criteria, and a list of LifeLine Service Providers in their service territory.
 - A contact number that participants can call for any questions.
 - Boost/T-Mobile should notice their customers with the implementation plan 30 days prior to the end date of the pilot program.
- 3. Additionally, we recommend the Commission Implement the following Key Elements in future pilot programs:
 - Devise and distribute marketing materials from a trusted source or sources.
 - Plan for and establish adequate infrastructure and staffing to effectively implement categorical eligibility determination.
 - Streamline and if possible, automate the collection and analysis of participant statistics.
 - Include in the Pilot design, a framework for the Commission to conduct regular assessments of the Pilot operations and participant satisfaction and as needed, implement incremental changes to re-align Pilot activities with its objectives.
 - Consider the personnel and resource needs to implement Pilots as part of the Pilot approval process.
 - Pre-determine the role of the administrator, and how they will be paid for their work.

APPENDIX Plans Offered

Plan Pricing and limited offers - Current

