



April 9, 2025

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

**RE: Assembly Bill 470 – OPPOSE
As Amended March 17, 2025**

Dear Assembly Member McKinnor:

On behalf of the Rural County Representatives of California (RCRC), California State Association of Counties (CSAC), and Urban Counties of California (UCC), we regretfully oppose your Assembly Bill 470. This measure would abandon essential responsibilities and phase out reliable and affordable access to basic telephone service for all Californians.

Carrier of Last Resort (COLR) telephone services providers are located throughout the state, ensuring access to basic telephone service, many times to residents that lack dependable or affordable options for connectivity. The California Public Utilities Commission (CPUC) oversees these service providers to ensure that important consumer protections, such as access to free 9-1-1 and discounted service rates through the Lifeline program, are implemented. Most importantly, COLR providers are required to provide service to anyone that requests it, and must have the ability to do so, in cases such as new housing developments or restoration of service after a major storm or natural disaster. In contrast, non-COLR providers, such as wireless companies, may offer service in an area but are under no obligation to continue, nor are they required to provide reliable and affordable options to eligible residents.

AB 470 would allow a COLR provider to automatically shed its obligations by simply notifying the CPUC that, in its own determination, there are no customers or population in a given area and that alternative voice services exist. The mere notification by the COLR provider that it meets these requirements relieves it of the designation and rate requirements. This self-determined process lacks oversight and hands monopolies a financial incentive to make self-interested claims—potentially leaving entire communities without guaranteed telephone service. The CPUC's core function is to balance procedures and safeguards to protect consumers by ensuring safe, reliable utilities and infrastructure at fair rates, and this bill undermines that mission.

COLR obligations are technology-neutral, allowing providers to use any available technology, including fiber, to fulfill their commitments. Unlike basic telephone service, alternative services lack minimum reliability, accessibility, and affordability standards. AB 470 would allow providers to exit the market and neglect future system maintenance, creating a risk that entire communities could be left without viable phone service options.

We support the transition to modern, reliable telecommunications infrastructure, but AB 470 fails to provide a meaningful transition plan. Instead, it prioritizes industry convenience over maintaining public safety and consumer protections. California must ensure that the shift to advanced technologies is done responsibly, holding companies accountable so that no resident loses access to receiving essential communication services. The CPUC is already engaged in a transparent, holistic review of COLR policies to modernize them without abandoning customers—especially those in areas where market forces alone do not guarantee quality, competitive service.

For these reasons, we must respectfully oppose your AB 470. We look forward to working collaboratively to ensure the COLR construct aligns with AB 470's stated intent of establishing a responsible, equitable transition plan—one that truly guarantees all Californians have reliable, affordable, fast, and safe communication options, regardless of who they are or where they live. Unfortunately, as currently written, AB 470 falls short of this commitment. If you should have any questions, please do not hesitate to contact Tracy Rhine (RCRC) at trhine@rcrcnet.org, Mark Neuburger (CSAC) at mneuburger@counties.org, or Jean Kinney Hurst (UCC) at jkh@hbeadvocacy.com.

Sincerely,



Tracy Rhine
Senior Policy Advocate
RCRC



Mark Neuburger
Legislative Advocate
CSAC



Jean Kinney Hurst
Legislative Advocate
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cc: The Honorable Tasha Boerner, Chair, Assembly Communications & Conveyance Committee
Members of the Assembly Communications & Conveyance Committee
Emilio Perez, Chief Consultant, Assembly Communications & Conveyance Committee
Daniel Ballon, Consultant, Assembly Republican Caucus