

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	
)	
Telrite Corporation d/b/a Life Wireless)	
for Designation as an Eligible)	
Telecommunications Carrier in the State of)	Docket No. UT-110321
Washington Pursuant to 47 U.S.C. § 214 (e)(2))	
On a Wireless Basis (Low Income Only))	

**SUPPLEMENT TO PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER ON A WIRELESS BASIS**

Telrite Corporation d/b/a Life Wireless. (“Telrite” or the “Company”) by and through its undersigned counsel, submits this Supplemental Filing to the Washington Utilities and Transportation Commission (the “Commission”) to provide additional information supporting its request for designation as an eligible telecommunications carrier (“ETC”). The additional information set forth below is incorporated by reference into and further supports the Petition filed in this docket on February 16, 2011.

A. Telrite Will No Longer Seek Link Up

On February 6, 2012, the Federal Communications Commission (the “FCC”) released its Lifeline Reform Order, which amended its rules to eliminate Link Up support on all non-Tribal lands for all ETCs effective April 1, 2012.¹ Telrite’s pending ETC Petition seeks Link Up support on non-Tribal lands. As a result of the Lifeline Reform Order, Link Up support will not

¹ In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6 2012) (“Lifeline Reform Order”).

be provided after March, 2012. Therefore, Telrite now seeks ETC designation in the state of Washington (the “State”) for Lifeline only, and will no longer seek Link Up support.

B. Telrite Will Offer The Supported Services

Section 214(e)(1)(A) of the Act² requires an ETC to offer the services that are supported by federal universal service support mechanisms under section 254(c). Effective December 29, 2011, pursuant to the USF/ICC Transformation Order³, as further clarified by the USF/ICC Order on Reconsideration⁴, “voice telephony services” shall be supported by federal universal support mechanisms.

Upon designation as an ETC in the State, and consistent with state and federal policies favoring universal service, Telrite will offer voice telephony services as described in Section 54.101 of the FCC Rules.⁵

C. Telrite Has Filed a Compliance Plan With the FCC

Under Section 214(e)(1)(A) of the Act an ETC must offer the services supported by federal universal service support mechanisms throughout its designated service area “either using

² 47 U.S.C. § 214(e)(1).

³ In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“USF/ICC Transformation Order”).

⁴ In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (“USF/ICC Order on Reconsideration”).

⁵ 47 C.F.R. §§ 54.101(a).

its own facilities or a combination of its own facilities and resale of another carrier's services."⁶ In its Lifeline Reform Order, the FCC decided to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC's compliance with certain 911 requirements and the ETC's filing and approval by the FCC of a compliance plan describing the ETC's adherence to certain protections prescribed by the FCC ("Blanket Forbearance").

Telrite seeks limited ETC designation in the State to participate in the Lifeline program and has opted to avail itself of the FCC's grant of Blanket Forbearance.⁷ On March 12, 2012, the Company filed its Compliance Plan ("Compliance Plan") with the FCC, a copy of which is attached hereto as **Exhibit I**. Telrite's filing also addresses its commitment to adhere to certain 911 requirements specified by the FCC. Telrite will provide the Commission a final copy of the Compliance Plan upon FCC approval.

⁶ 47 U.S.C. § 214(e)(1)(A).

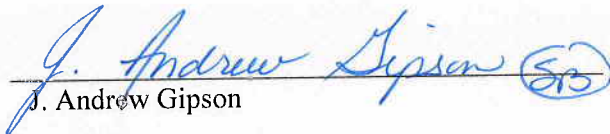
⁷ See *Lifeline Reform Order*, ¶ 368. Although the Company qualifies for and seeks to avail itself of the FCC's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements.

CONCLUSION

Telrite provides herein supplemental information supporting its request for designation as an ETC. The Company meets the requirements for ETC designation in the State and respectfully requests that the Commission designate Telrite Corporation d/b/a Life Wireless as an ETC for the provision of Lifeline supported service on a wireless basis throughout its Service Area (as defined in it Petition).

Respectfully submitted,

TELRITE CORPORATION DBA LIFE WIRELESS

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VERIFICATION

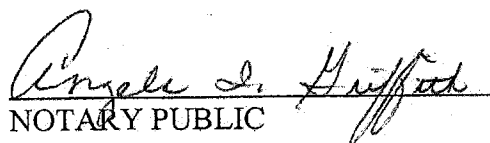
STATE OF GEORGIA

COUNTY OF COBB

PERSONALLY came and appeared before me, the undersigned party in and for the jurisdiction aforesaid, the within named Brian Lisle who after being duly sworn by me stated under oath as follows: that I am President of Telrite Corporation d/b/a Life Wireless ("Telrite"); that I executed the foregoing pleading for and on behalf of Telrite; that I am authorized to execute and file said pleading; and that the matters and things set forth in said pleading are true and correct to the best of my knowledge, information and belief.


Brian Lisle

SWORN TO AND SUBSCRIBED before me on this the 30th day of March, 2012.


NOTARY PUBLIC

My Commission Expires:

Notary Public, Cobb County, Georgia
My Commission Expires July 2, 2015

