

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET UT-101640
	)	
i-wireless, LLC	)	ORDER 01
	)	
	)	
	)	ORDER GRANTING THE PETITION
	)	FOR EXEMPTION FROM
	)	PROVISIONS OF WAC 480-123-
For an Exemption from WAC 480-123-	)	030(1)(d), (f) and (g) AND
030(1)(d), (f) and (g); and Designation as	)	DESIGNATION AS AN ELIGIBLE
an Eligible Telecommunications Carrier	)	TELECOMMUNICATIONS
	)	CARRIER
.....	)	

**INTRODUCTION AND BACKGROUND**

- 1     On September 29, 2010, i-wireless, LLC (i-wireless or Company) filed a petition with the Washington Utilities and Transportation Commission (UTC or Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) pursuant to Section 214 (e)(2) of the Communications Act of 1934, as amended (the Act), and Section 480-123-030 of the Washington Administrative Code (WAC). i-wireless seeks ETC designation in Washington for the purpose of providing its pre-paid Lifeline service to qualified low-income households. It will only seek the Lifeline portion of low-income support from the federal Universal Service Fund (USF), which subsidizes eligible low-income households' monthly charges for basic telephone services. i-wireless does not seek Link-Up support, which subsidizes the non-recurring connection fee for basic telephone services. i-wireless seeks ETC designation only for service areas where its underlying wholesale provider, Sprint Nextel Corporation (Sprint Nextel), has facility coverage (Appendix A). i-wireless does not seek to participate in the state Lifeline program, Washington Telephone Assistance Program.
- 2     i-wireless filed three amendments subsequent to its original petition. On June 10, 2011, i-wireless submitted an amendment to revise its Lifeline rate plans, including plans for tribal land residents. It also provided a copy of its additional voluntary commitments to be included in its Compliance Plan for the Federal Communications Commission (FCC) for the purpose of obtaining forbearance from the own facilities requirement. On October 24, 2011, i-wireless notified the Commission that the FCC has approved the Company's Compliance Plan and provided a copy of the approval order. On July 20, 2012, i-wireless filed a third amendment to revise its Lifeline rate plans and describe in details how it plans to comply with all the federal and Washington rules and requirements on Lifeline program.
- 3     i-wireless is a North Carolina limited liability company with its principal office in Newport, Kentucky. It was founded on September 7, 2006. It is a Mobile Virtual

Network Operator, using the Sprint Nextel network on a wholesale basis nationwide and sells its wireless services through a partnership with Kroger grocery stores (Kroger), one of the nation's largest retail grocery chains. Kroger owns 50 percent of i-wireless. In Washington, i-wireless will be sold through Fred Myer and QFC, which are both wholly owned by Kroger and have over 130 stores state wide.

- 4 Other than through special events, i-wireless's Lifeline products are offered almost exclusively through Kroger stores or its wholly owned affiliates. In addition, Kroger customers can accumulate free minutes for i-wireless service for dollars spent at Kroger family stores using their Kroger shopper's card (Kroger Free Minute Loyalty Program).
- 5 The Commission has jurisdiction over ETC petitions. Section 214 (e) of the Act authorizes state regulatory commissions to designate a qualified common carrier as an ETC for the purpose of receiving federal USF.<sup>1</sup> By rule, WAC 480-123-040, the Commission has the authority to approve petitions from carriers requesting ETC designation. The Commission's authority to grant or deny petitions for ETC designation includes the authority to impose conditions.<sup>2</sup>

### DISCUSSION

- 6 Commission Staff (Staff) finds that i-wireless qualifies for ETC designation with the proposed conditions in Appendix B. Pursuant to 47 U.S.C. § 214(e)(2), state commissions may designate more than one carrier as an ETC in an area if such designation is "consistent with the public interest, convenience, and necessity" and the carrier seeking designation as an ETC meets the two requirements of 47 U.S.C. § 214(e)(1):
- (A) offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
  - (B) advertise the availability of such services and the charges therefor using media of general distribution.
- 7 i-wireless is a common carrier. It is a wireless service reseller that relies on its underlying network provider's facilities to offer services supported by federal universal service mechanisms, as defined in 47 C.F.R. § 54.101(a). i-wireless filed with the FCC a petition requesting the forbearance from the own facilities requirements. The FCC

---

<sup>1</sup> 47 U.S.C. § 214(e)(2). See also 47 C.F.R. § 54.201(d).

<sup>2</sup> UT-093012, *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d), (f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund (UTC TracFone Proceeding)*, Order 03 (Dated June 24, 2010), ¶78.

granted the forbearance on June 25, 2010<sup>3</sup> and approved the Company's compliance plan on October 21, 2011.<sup>4</sup> The Company also commits that it will advertise the availability of Lifeline services.

- 8 The Company meets the requirements of the Washington rule on ETC designation, WAC 480-123-030, except subsections (1)(d), (f) and (g).
- 9 WAC 480-123-030(1)(d) requires an ETC petitioner to provide a "substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers." i-wireless requests an exemption from the requirement because the Company seeks only Lifeline support, not federal High Cost Support. It does not have the obligation to use federal USF for infrastructure investment.
- 10 i-wireless requests an exemption from the subsections (1)(f) and (1)(g) because it does not have access to its underlying carriers' coverage map, nor does it have control over its underlying carriers' emergency power back up facilities.
- 11 WAC 480-123-030(1)(f) requires a wireless ETC petitioner to provide "a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals." WAC 480-123-030(1)(g) requires a wireless ETC to have "at least four hours of back up battery power at each cell site, back-up generators at each microwave hub, and at least five hours back up battery power and back-up generators at each switch."
- 12 Staff supports the Company's request for exemption from the three requirements under WAC 480-123-030. Staff believes the exemption is consistent with the public interest, the purposes underlying regulation, and applicable statutes, and states that granting the exemption will also be consistent with the Commission's designations of other Lifeline-only ETCs such as TracFone Wireless, Inc. (TracFone), Virgin Mobile USA, L. P. (Virgin Mobile), YourTel American, Inc. (YourTel), Cricket Communication, Inc. (Cricket) and Budget Prepay, Inc. (Budget).
- 13 i-wireless brands its Lifeline offering as "Access Wireless." It offers two rate plans with no out of pocket charges for qualified Lifeline customers: (1) a 150 minutes plan with a

---

<sup>3</sup> *In the Matter of Federal-State Joint Board on Universal Service, Telecommunications Carriers Eligible for Universal Service Support, i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, CC Docket No. 96-45 and WC Docket No. 09-197, Order, FCC 10-117 (rel. June 25, 2010).

<sup>4</sup> *In the Matter of Federal-State Joint Board on Universal Service, Telecommunications Carriers Eligible for Universal Service Support, i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, CC Docket No. 96-45 and WC Docket No. 09-197, Order, FCC 11-1763 (rel. October 21, 2011).

roll over feature and customers under this plan can earn additional free minutes through Kroger Free Minute Loyalty Program; and (2) a 250 minutes plan without a roll over feature and excluded from Kroger Free Minute Loyalty Program. Alternatively, qualified Lifeline customers can choose to have a \$15 discount off any i-wireless's retail wireless service plan. With federal tribal Lifeline support, i-wireless offers unlimited monthly voice usage plan free of charge for qualified tribal customers. Qualified tribal Lifeline customers may also choose to have a \$40 discount off any i-wireless's retail plan instead. A free handset will be provided to Lifeline customers under any of the above plans.

- 14 Staff reviewed i-wireless' technical and financial capabilities to provide the supported Lifeline service. Staff has confidence in the company's technical competency in offering the wireless services based on its operational history over the years. Initially, Staff had concerns about the company's financial condition especially the high debt and the company's ability to make a profit. However, the following additional factors were evaluated in determining whether the company is financially capable: Kroger owns 50 percent of the company and intends to provide funding for the company's ongoing operation; the overall interest rate for the long term debt is very low; non-affiliate debt is guaranteed by Kroger; the company offers services to non-Lifeline customers and does not rely exclusively on Lifeline disbursements; the company has a two-year comprehensive financial plan approved by its Board of Directors. Given consideration to the above factors, staff believes the company is financially capable of providing the supported Lifeline service in compliance with all the low-income program rules.
- 15 In the proceedings involving the ETC petitions of TracFone, Virgin Mobile, YourTel, Cricket and Budget, Staff recommended additional conditions to ensure that the companies would provide Lifeline services in a manner consistent with the public interest. Staff recommends that the Commission apply a similar set of conditions to i-wireless's ETC designation. The Company agrees to the conditions in Appendix B. Given the recent implementation of uniform Lifeline eligibility criteria by the FCC, Staff recommends the Commission require i-wireless to use the federal default eligibility criteria in 47 C.F.R. § 54.409(2).<sup>5</sup> As with all other similarly situated Lifeline-ETCs in Washington, Staff encourages i-wireless to work with the Department of Social and Health Services (DSHS) to gain access to their Benefits Verification System, a query database to verify the eligibility of those customers whose qualification is based on their participation in Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income and Temporary Assistance for Needy Families. For customers who qualify based on their participation in the three additional federal assistance programs that are not in the DSHS database, or for customers who qualify based on income-based criteria, the Company must review relevant proof documentation, as specified in 47 C.F.R. § 54.410. i-wireless is also required to provide its relevant customer records to the

---

<sup>5</sup> The rationale is detailed in staff memo on Cricket Communications, Inc.'s ETC designation petition in Docket UT-111534.

Commission and the DSHS at least on an annual basis for the purpose of identifying ineligible customers or customers who receive duplicate Lifeline benefits from the Company and a wireline Lifeline provider. This condition will be in place until the FCC's National Accountability Database and the National Lifeline Eligibility Database are fully functional.

### FINDINGS AND CONCLUSIONS

- 16 (1) The Commission has jurisdiction over eligible telecommunications carriers in Washington and the subject matter of this Order pursuant to 47 U.S. C. § 214(e)(2), 47 C.F.R. §§ 54.201(b)-(c) and WAC 480-123-040.
- 17 (2) i-wireless, LLC (i-wireless) commits to offer all services that are to be supported by the federal universal service support mechanisms set forth in 47 U.S.C. § 254(c) and 47 C.F.R. § 54.101(a) and advertise the availability of the services.
- 18 (3) Subject to the conditions in this Order and except for the requested exemption, i-wireless meets the requirements for ETC designation under 47 U.S. C. § 214(e)(1), 47 C.F.R. § 54.201(d) and WAC 480-123-030.
- 19 (4) The Commission finds that granting i-wireless's petition for an exemption from the requirement of submitting an investment plan in WAC 480-123-030(1)(d), (f) and (g) is consistent with the public interest, the purposes underlying regulation, and applicable statutes.
- 20 (5) The Commission finds that granting i-wireless's petition for designation as an Eligible Telecommunications Carrier for the purpose of receiving federal Lifeline support, subject to the conditions in this Order, will advance the purposes of universal service found in 47 U.S.C. § 254. The designation will benefit low-income households in Washington. The designation is in the public interest and should be granted subject to the conditions set forth in Appendix B to this Order.
- 21 (6) The Commission should retain jurisdiction over the subject matter and the parties to effectuate the terms of this Order.
- 22 (7) The Commission should reserve the right to modify the ETC designation and the conditions at a future date.

**ORDER**

**THE COMMISSION ORDERS:**

- 23 (1) The Commission grants the petition of i-wireless, LLC for an exemption from WAC 480-123-030(1)(d), (f) and (g) which require the filing of an substantive investment plan, wireless network maps and certification on back up power capabilities, respectively.
- 24 (2) The Commission grants the petition of i-wireless, LLC for designation as an Eligible Telecommunications Carrier for the purpose of receiving Low Income Support (Lifeline) from the federal Universal Service Fund in service areas specified in Appendix A to this Order. The designation is subject to the conditions set forth in Appendix B to this Order.
- 25 (3) i-wireless, LLC must comply with applicable federal laws and regulations on ETC obligations and requirements.
- 26 (4) i-wireless, LLC must comply with Washington's rules on ETC obligations and requirements set forth in WAC 480-123, with the exception of WAC 480-123-030(1)(d), (f) and (g).
- 27 (5) The Commission retains jurisdiction over the subject matter and the parties to this proceeding.
- 28 (6) The Commission has authority to modify, suspend, or revoke i-wireless, LLC's ETC designation granted in this Order at a future date.

DATED at Olympia, Washington, and effective September 13, 2012.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

JEFFREY D. GOLTZ, Chairman

PATRICK J. OSHIE, Commissioner

Appendix A

i-wireless, LLC  
Areas for Eligible Telecommunications Carrier Designation

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
ASOTIN TELEPHONE CO.	
	ANATONE
	ASOTIN
CENTURYTEL OF COWICHE, INC.	
	COWICHE
	RIMROCK
	TIETON
CENTURYTEL OF INTER-ISLAND, INC.	
	BLAKELY ISLAND
	EAST SOUND
	FRIDAY HARBOR
	LOPEZ
CENTURYTEL OF WASHINGTON, INC.	
	AMES LAKE
	ARLETTA
	ASHFORD
	BASIN CITY
	CARNATION
	CATHLAMET
	CHENEY
	CHINOOK
	CONNELL
	COULEE CITY
	CURTIS
	EDWALL-TYLER
	ELTOPIA
	EUREKA
	FALL CITY
	FORKS
	GIG HARBOR
	HARRINGTON
	HUMPTULIPS
	KAHLOTUS

<b><u>INCUMBENT LOCAL EXCHANGE CARRIER</u></b>	<b><u>EXCHANGE</u></b>
	KETTLE FALLS
	KINGSTON
	LAKEBAY
	LIND
	MATHEWS CORNER
	MCCLEARY
	MEDICAL LAKE
	MESA
	MONTESANO
	MORTON
	NORTH BEND
	OCEAN PARK
	OCOSTA
	ODESSA
	ORTING
	OTHELLO
	PACKWOOD
	PUGET ISLAND
	RANDLE
	REARDAN
	RITZVILLE-BENGE
	SOUTH PRAIRIE
	SPANGLE
	SPRAGUE
	TWISP
	VADER
	VASHON
	WASHTUCNA
	WILSON CREEK
ELLENSBURG TELEPHONE CO.	
	ELLENSBURG
FRONTIER COMMUNICATIONS NORTHWEST INC.	
	ACME-DEMING-WHATCOMCTY
	ALGER
	ANACORTES
	ARLINGTON
	BENTON CITY



<b><u>INCUMBENT LOCAL EXCHANGE CARRIER</u></b>	<b><u>EXCHANGE</u></b>
	BIG LAKE
	BLAINE-BIRCH BAY-GTLD
	BOTHELL
	BURLINGTON
	CAMAS-WASHOUGAL
	CASHMERE
	CHELAN
	CONCRETE
	CONWAY
	CUSTER-GTLD
	DEMING-WHATCOMCTY
	EDISON
	ENTIAT
	EVERETT
	EVERSON-GTLD
	FAIRFIELD
	FERNDAL-ETLD
	GARFIELD
	GEORGE
	GRANITE FALLS
	GRAYLAND
	HALLS LAKE
	KENNEWICK
	KIRKLAND
	LA CONNER
	LATAH
	LAUREL-WHATCOMCTY
	LEAVENWORTH
	LYMAN-HAMILTON
	LYNDEN
	MANSFIELD
	MAPLE FALLS
	MARBLEMOUNT
	MARYSVILLE
	MONROE
	MOUNT VERNON
	NACHES

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	NEWPORT
	NILE
	OAK HARBOR
	PALOUSE
	PULLMAN
	QUINCY
	RICHLAND
	RICHMOND BEACH
	ROCKFORD
	ROSALIA
	SEDRO WOOLLEY
	SEDRO WOOLLEY-CONTEL
	SILVER LAKE
	SKYKOMISH
	SNOHOMISH
	SOAP LAKE
	STANWOOD
	STEVENS PASS
	SULTAN
	SUMAS-GTLD
	TEKOA
	WATERVILLE
	WENATCHEE
	WESTPORT
HOOD CANAL TELEPHONE CO.	
	UNION
INLAND TELEPHONE CO.	
	DEWATO
	PRESCOTT
	ROSLYN
	UNION TOWN
KALAMA TELEPHONE CO.	
	KALAMA
LEWIS RIVER TELEPHONE CO., INC.	
	LA CENTER
MASHELL TELECOM, INC.	
	EATONVILLE

<b><u>INCUMBENT LOCAL EXCHANGE CARRIER</u></b>	<b><u>EXCHANGE</u></b>
MCDANIEL TELEPHONE CO.	
	MOSSYROCK
	ONALASKA
	SALKUM
PIONEER TELEPHONE CO.	
	ENDICOTT
QWEST CORPORATION	
	ABERDEEN-HOQUIAM
	AUBURN
	BAINBRIDGE ISLAND
	BATTLE GROUND
	BELFAIR
	BELLEVUE
	BELLINGHAM-GTLD
	BLACK DIAMOND
	BREMERTON
	BUCKLEY
	CASTLE ROCK
	CENTRALIA
	CHEHALIS
	CLE ELUM
	COLFAX
	COLVILLE
	COPALIS
	DEER PARK
	DES MOINES
	EASTON
	ELK
	ENUMCLAW
	EPHRATA
	GRAHAM
	GREEN BLUFF
	HOODSPORT
	ISSAQUAH
	KENT
	LIBERTY LAKE
	LONGVIEW-KELSO

<b><u>INCUMBENT LOCAL EXCHANGE CARRIER</u></b>	<b><u>EXCHANGE</u></b>
	LOON LAKE
	MAPLE VALLEY
	MOSES LAKE
	NEWMAN LAKE
	OLYMPIA
	OTHELLO
	PATEROS
	PORT ANGELES
	PORT LUDLOW
	PORT ORCHARD
	PORT TOWNSEND
	PUYALLUP
	RENTON
	RIDGEFIELD
	ROCHESTER
	ROY
	SEATTLE
	SEQUIM
	SHELTON
	SILVERDALE
	SPOKANE
	SPRINGDALE
	SUMNER
	TACOMA
	TACOMA WAVERLY
	VANCOUVER
	WAITSBURG
	WARDEN
	WINLOCK
	YAKIMA
ST. JOHN TELEPHONE CO.	
	ST JOHN
TENINO TELEPHONE CO.	
	TENINO
TOLEDO TELEPHONE CO., INC.	
	TOLEDO
UNITED TELEPHONE - NORTHWEST	

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	CHIMACUM-CENTER
	COLUMBIA
	DALLESFORT
	GOLDENDALE
	GRANDVIEW
	GRANGER
	HARRAH
	HOOD CANAL
	LYLE
	MABTON-BICKLETON
	MATTAWA
	PATERSON
	PORT ANGELES-GARDINER
	POULSBO
	PROSSER
	ROOSEVELT
	STEVENSON
	TOPPENISH-ZILLAH
	TROUT LAKE
	WAPATO
	WHITE SALMON
	WHITE SWAN
	WHITSTRAN
	WILLARD
WESTERN WAHKIAKUM COUNTY TELEPHONE CO.	
	GRAYS RIVER
	NASELLE
WHIDBEY TELEPHONE CO.	
	POINT ROBERTS
	SOUTH WHIDBEY
YCOM NETWORKS, INC.	
	YELM

## Appendix B

### Washington State Conditions on Designation of i-wireless, LLC as an Eligible Telecommunications Carrier

1. i-wireless, LLC's (i-wireless or Company) designation as an Eligible Telecommunications Carrier (ETC) shall be for an interim period of one year from the effective date of the Commission's Order approving such designation, subject to Commission review. Before the end of one year after the effective date of the Order, i-wireless may seek to renew its designation pursuant to WAC 480-123-030 through -040. i-wireless's designation for the interim period shall continue until the Commission's decision to the designation.
2. Within 30 days of approval of its ETC designation in Washington and prior to offering Lifeline services, i-wireless must make a compliance filing for approval by the Commission containing the following:
  - a. i-wireless's Lifeline rate plans, terms and conditions. The rates, terms and conditions shall include all provisions that apply to the Lifeline services offered by i-wireless in Washington state and detailed procedures explaining how customers can participate in a particular Lifeline plan.
  - b. i-wireless's proposed language to be used in all advertising of Lifeline services and on its websites. The language shall include information directing customers to the Washington State Office of the Attorney General for complaints regarding any Lifeline service issues.
  - c. i-wireless's Lifeline Customer Application Form.

Commission Staff shall review i-wireless's compliance filing and recommend to the Commission whether it should be approved or rejected within ten business days. i-wireless shall not offer Lifeline services until the Commission has approved its compliance filing.

3. i-wireless shall file with the Commission any future changes to its rates, terms, or conditions at least one day prior to the effective date of the change.
4. The information on i-wireless's rates, terms and conditions shall be provided in a package sent or given to Lifeline customers after enrollment in i-wireless's Lifeline program, as well as at i-wireless's official Lifeline websites.
5. i-wireless shall also provide Lifeline customers with the choice of all other rate plans available to its regular customers.

6. For the rate plan free of charge to customers, i-wireless must offer at least one plan with a minimum of 250 minutes per month. The company may invoke Condition No. 3 only for the purpose of increasing the number of minutes or enhancing the features in the Lifeline plan, but not decreasing the number of minutes.
7. i-wireless shall deactivate a Lifeline account if the customer has no usage for 60 consecutive days (“usage” is defined in 47 C.F.R. § 54.407(c)(2)). No fewer than eight business days before deactivation, i-wireless shall send the customer a written notice by mail about the potential deactivation and ways to avoid unwanted deactivation. The customer shall have a 30 day grace period from the deactivation date to reactivate the Lifeline account by incurring “usage.” When a customer reactivates the account, i-wireless must deposit the minutes the customer is entitled to for the grace period.
8. On a quarterly basis beginning with the quarter ending on December 31, 2012, i-wireless shall provide the number of Lifeline customers that it enrolls each month. i-wireless shall also report the number of deactivated Lifeline customers each month by service plan and the reasons for deactivation (e.g., no usage for 60 consecutive days, annual verification unsuccessful, or voluntary exit). Quarterly reports shall be filed with the Commission no later than 30 days after the end of each quarter.
9. i-wireless shall respond within 30 days to Commission Staff’s information requests on i-wireless’s Lifeline operations, including but not limited to Lifeline customers’ usage patterns and Lifeline customer records.
10. i-wireless shall cooperate with the Commission and the Department of Social and Health Services (DSHS) to work out a procedure to verify i-wireless Lifeline customers’ eligibility.
11. i-wireless must not deduct airtime minutes for calls to customer care made from the customer’s handset by dialing 611. i-wireless shall explicitly state the policy of free 611 calls in its Lifeline service agreements. i-wireless may require the customer to call the toll-free customer care number from another phone if necessary to resolve technical issues related to the handset or its programming.
12. i-wireless shall have DSHS audit its Lifeline customers’ eligibility (including program eligibility and duplication with other Lifeline providers) at least once a year. Beginning in 2013, by March 31 of each year, i-wireless shall file with the Commission the record of its Lifeline customers who qualify based on their participation in Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income and Temporary Assistance for Needy Families in the prior calendar year. The customer records are subject to review of the Commission and DSHS. The records must have all the necessary information and be in an electronic format required by DSHS. After the Commission and DSHS notify i-wireless of the results of the eligibility review, i-wireless

must take appropriate measures to either correct the customer records or stop providing services to ineligible customers and report the resolutions to the agencies within 60 days of the notice. This condition shall be in place until the national accountability database for duplicate Lifeline claims and the national database for Lifeline customer eligibility are fully functional.

13. i-wireless shall provide the Commission a copy of its annual Lifeline Verification survey results that it files with the Universal Service Administration Company (USAC) by August 31 of each year.
14. i-wireless shall file with the Commission, by March 31 of each year, a report on the number of complaints, categorized by the different nature of complaints that it received from Washington Lifeline customers during the prior calendar year (e.g., billing disputes and service quality complaints). This report shall include complaints filed with i-wireless, the Commission's Consumer Protection and Communications Section, the Washington State Office of the Attorney General, and the Federal Communications Commission (FCC). The Commission reserves the rights to revoke i-wireless's ETC designation if i-wireless fails to provide reasonable quality of service.
15. i-wireless shall cooperate with the Washington State Enhanced 911 Program (E911) and all Public Safety Answering Points on E911 issues and shall, upon request, designate a representative to serve as a member or alternate member of the Washington State E911 Advisory Committee or its Communications Sub-committee.
16. i-wireless shall participate in the Washington State E911 Program's "What's Your Location" public information campaign if the E911 Program requests the participation of wireless carriers.
17. i-wireless shall collaborate with the Washington State E911 Program to test the compatibility of its handsets with the new Emergency Service Information Network in Washington, including supplying handsets representative of i-wireless's proprietary software and technical assistance should call delivery discrepancies be discovered.
18. i-wireless shall comply with rules on cessation of business as specified in WAC 480-120-083.
  - a. Prior to cessation of business, i-wireless shall make arrangements with its underlying carriers to provide minutes already sold to customers under the same terms and conditions it has with the customers, or provide refunds to the existing customers.
  - b. i-wireless shall provide written notice to the following persons at least 30 days in advance of cessation of service:



- i. The Commission;
    - ii. The state 911 program;
    - iii. Each of its customers;
    - iv. The national number administrator.
  - c. The notice to the Commission and the state 911 program must include the same information required by WAC 480-120-083 (3).
  - d. The notice to the customers must include the same information required by WAC 480-120-083 (4).
  - e. The notice to the national number administrator must include the same information required by WAC 480-120-083 (7).
  - f. i-wireless shall file with the Commission at least 30 days in advance of its cessation of business and request the relinquishment of its ETC designation in Washington.
19. i-wireless shall collect and maintain necessary records and documentation to ensure its compliance with the applicable FCC and Commission requirements, including existing requirements and any future modifications. The records and documentation shall be provided to Commission Staff upon request.
20. i-wireless shall cooperate with Commission Staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
21. i-wireless shall comply with all applicable federal and Washington state statutes and regulations, including Enhanced 911 tax contributions.