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May 31, 2013

**Via Electronic Filing and U.S. Mail**

Mr. Dave Danner  
Executive Director/Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive, S.W.  
Olympia, WA 98504-7250

Re: Telrite Corporation d/b/a Life Wireless; Docket No. UT-110321

Dear Mr. Danner:

Please find enclosed for filing the original and twelve (12) copies of the Supplement to Amended Petition of Telrite Corporation d/b/a Life Wireless for Designation as an Eligible Telecommunications Carrier in the State of Washington on a Wireless Basis (Low Income Only).

Please contact me or my assistant, Sherry Boyd (601) 949-4737, sboyd@joneswalker.com, if you have any questions or comments regarding this filing.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Andrew Gipson".

J. Andrew Gipson

JAG/ssb  
Enclosures

cc: Brian Lisle

{JX039183.2}

JONES WALKER LLP

ALABAMA \* ARIZONA \* CALIFORNIA \* DISTRICT OF COLUMBIA \* FLORIDA \* GEORGIA \* LOUISIANA \* MISSISSIPPI \* NEW YORK \* TEXAS

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**SUPPLEMENT TO AMENDED PETITION OF TELRITE CORPORATION D/B/A LIFE  
WIRELESS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS  
CARRIER IN THE STATE OF WASHINGTON PURSUANT TO 47 U.S.C. §  
214(E)(2) ON A WIRELESS BASIS (LOW INCOME ONLY)**

May, 2013

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In the Matter of the Petition of	)	
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Telecommunications Carrier in the State of	)	
Washington Pursuant to 47 U.S.C. § 214(e)(2)	)	
on a Wireless Basis (Low Income Only)	)	

**SUPPLEMENT TO AMENDED PETITION OF TELRITE CORPORATION D/B/A  
LIFE WIRELESS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS  
CARRIER IN THE STATE OF WASHINGTON PURSUANT TO 47 U.S.C. §  
214(E)(2) ON A WIRELESS BASIS (LOW INCOME ONLY)**

On January 30, 2013, Telrite Corporation d/b/a Life Wireless (“Telrite” or the “Company”) submitted its Amended Petition requesting that the Washington Utilities and Transportation Commission (the “Commission”) designate Telrite as an Eligible Telecommunications Carrier (“ETC”) in portions of the State of Washington (the “Service Area”) for the purpose of receiving federal low-income universal service support for prepaid wireless services, specifically Lifeline. Telrite submits this supplemental filing 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 application filed in this docket on January 30, 2013.

1. Telrite submits herein a revised list of the exchanges for which the Company is requesting ETC status in the State of Washington as a replacement for **Exhibit “A.”**

2. Telrite requests waiver from Wash. Admin. Code § 480-123-030(1)(d), (f), and (g).

a. **Wash. Admin. Code § 480-123-030(1)(d).** WAC § 480-123-030(1)(d) requires petitions for ETC designation to include a substantive plan of the investments to be made with initial federal support during the first two years in which support is received. This requirement applies to carriers that seek high-cost support to fund investments to their networks.

Telrite is requesting ETC designation in Washington solely for the purpose of participating in the Lifeline program as a prepaid wireless carrier. It is not seeking designation for the purpose of participating in the USF's high-cost program. Based on the foregoing, Telrite has no basis for filing an investment plan and should be exempt from WAC § 480-123-030(1)(d).

b. **Wash Admin. Code § 480-123-030(1)(f).** WAC § 480-123-030(1)(f) requires petitions for ETC designation to include 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. While Telrite does use its own facilities in combination with the Company's resale of services from underlying carriers, it does not own, control, nor plan to develop cell sites. Telrite's Service Area encompasses that of its underlying carriers in the State of Washington. As Telrite does not have access to the underlying carriers' maps of geographic service areas showing the location of cell sites, Telrite respectfully requests a waiver of the requirement under WAC § 480-123-130(1)(f) to provide coverage maps.

c. **Wash Admin. Code § 480-123-030(1)(g).** WAC § 480-123-030(1)(g) requires petitions for ETC designation on a wireless basis to include information that demonstrates its ability to remain functional in emergency situations including information that demonstrates it has 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. While Telrite possesses its own backup power generators at its facilities located in Georgia, Telrite resells facilities owned by AT&T in the State of Washington and, therefore, relies on the facilities of AT&T for backup battery power at each cell site, backup generators at each microwave hub, and backup battery and generators at each switch located in Washington. For these reasons, Telrite respectfully requests a waiver of the requirements of WAC § 480-123-030(1)(g) since AT&T maintains the appropriate level of backup power at each such site in Washington.

3. Telrite is a wireless ETC in the states of Arkansas, Georgia, Illinois, Indiana, Louisiana, Maine, Maryland, Michigan, Minnesota, Missouri, Oklahoma, Rhode Island, South Carolina, Texas, West Virginia, Wisconsin and Puerto Rico and has pending applications in Arizona, California, Colorado, Iowa, Kansas, Kentucky, Massachusetts, Mississippi, Montana, Nebraska, Nevada, New Jersey, North Dakota, Ohio, Oregon, Pennsylvania, South Dakota, Utah, Vermont and Wyoming.

4. Telrite plans to offer an enhanced Lifeline plan to residents of tribal lands in Washington. The enhanced Lifeline plan will offer unlimited voice and text for \$1.00 per month. Attached as Exhibit B to this Supplement is a copy of the Enhanced Tribal Lifeline form.

WHEREFORE, premises considered, having demonstrated herein that Telrite satisfies all the conditions of eligibility necessary for designation as an ETC in the State of Washington, and having shown that the public and universal service interests of the telecommunications consumers of the State of Washington will be properly served, Telrite respectfully requests that

the Commission promptly grant this Petition and designate Telrite Corporation d/b/a Life Wireless as a wireless eligible telecommunications carrier.

Respectfully Submitted,

By: 

J. Andrew Gipson  
Margarett A. Johnson  
Jones, Walker, Waechter, Poitevent, Carrère &  
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mjohnson@joneswalker.com

*Attorneys for Telrite Corporation d/b/a Life  
Wireless*

**CERTIFICATE OF SERVICE**

I, J. Andrew Gipson, do hereby certify that I have this day caused to be filed with the Washington Utilities and Transportation Commission via electronic filing the foregoing Petition to the following:

Mr. Dave Danner  
Executive Director/Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive, S.W.  
Olympia, WA 98504-7250

This the 31<sup>st</sup> day of May, 2013.

  
\_\_\_\_\_  
J. ANDREW GIPSON

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Jackson, Mississippi 39201  
Telephone: (601) 949-4789  
Facsimile: (601) 949-4804  
agipson@joneswalker.com

## **EXHIBITS**

Exhibit A - Exchanges (Replacement)

Exhibit B - Enhanced/Tribal Lifeline Form





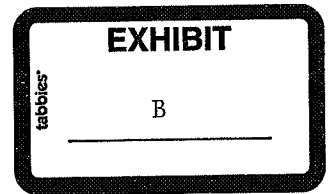


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SUMNER  
TACOMA  
TACOMAWVLY  
VANCOUVER  
WAITSBURG  
WALLAWALLA - TOUCHET  
WARDEN  
WINLOCK  
YAKIMA

ORDER

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### Wireless Lifeline/Link-Up-America Application

When completed mail, fax, or e-mail to:  
Telrite Corporation – LIFE Wireless  
PO Box 2840  
Covington, GA 30015  
FAX: 1-866-770-6110  
EMAIL: lwforms@lifewireless.com  
Call today for more information: 1-888-543-3620

**"No member of my family has previously received a federal linkup subsidy at my current address"**

This signed authorization is required in order to enroll you in the Lifeline/Link-Up-America program in your state. This authorization is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Company.

1. Sign me up for Lifeline: State service is provided in: WASHINGTON

2. I hereby certify that I participate in at least one of the following programs:

<input type="checkbox"/> Food Stamps	<input type="checkbox"/> National School Lunch Program's Free Lunch
<input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA)	<input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP)
<input type="checkbox"/> Temporary Assistance to Needy Families (TANF)	<input type="checkbox"/> Supplemental Security Income (SSI)
<input type="checkbox"/> Tribally Administered Temporary Assistance for Needy Families (Tribal TANF)	<input type="checkbox"/> Bureau of Indian Affairs General Assistance
<input type="checkbox"/> Head Start (income eligible)	<input type="checkbox"/> Medicaid

3. Enhanced Lifeline and Link Up

- I reside on the following reservation: \_\_\_\_\_
- My Tribal Enrollment Number is: \_\_\_\_\_

I certify, under penalty of perjury, that I am a current recipient of the above program(s) and will notify my local telephone company when I am no longer participating in any of the above-designated program(s). I give permission to the duly authorized official(s) administering the above programs to provide to the local telephone company my participation status in any of the above program(s). I give this permission on the condition that the information in this form and any information about my participation in the above programs provided by officials be maintained by the company as confidential customer account information.

4. I also certify that:

- My telephone service is listed in my name.
- I am not listed as a dependent on another person's tax return (unless over the age of 60).
- The address listed is my primary residence, not a second home or business.

Applicant's Name: \_\_\_\_\_

Applicant's Home Address \_\_\_\_\_ APT/UNIT \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Applicant's Home Telephone Number: \_\_\_\_\_ Or Applicant Can Be Reached At: \_\_\_\_\_

Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

AGENT ID \_\_\_\_\_

\*\*\*ADDRESS MUST BE APPLICANT'S PHYSICAL ADDRESS - POST OFFICE BOXES WILL NOT BE ACCEPTED