

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: info@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

July 26, 2018

VIA ELECTRONIC DELIVERY

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr., SW
Olympia, WA 98504

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Global Connection Inc. of America d/b/a StandUP Wireless; Docket UT-170560

Dear Mr. King:

Attached please find for filing both a public and confidential version of Global Connection Inc. of America d/b/a StandUP Wireless' ("Applicant") Amended Petition for Designation as an Eligible Telecommunications Carrier.

EXHIBIT 6 CONTAINS PROPRIETARY FINANCIAL INFORMATION AND IS LABELED "CONFIDENTIAL PER WAC 480-07-160." DUE TO THE HIGHLY COMPETITIVE NATURE OF THE TELECOMMUNICATIONS MARKETPLACE, APPLICANT RESPECTFULLY REQUESTS CONFIDENTIAL TREATMENT OF THE PROPRIETARY INFORMATION. APPLICANT EXPECTS THAT THIS INFORMATION WILL BE RESTRICTED TO COUNSEL, AGENTS AND EMPLOYEES WHO ARE SPECIFICALLY ASSIGNED TO THIS APPLICATION BY THE COMMISSION.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Lance J.M. Steinhart. P.C.
*Attorneys for Global Connection Inc. of America
d/b/a StandUP Wireless*

Attachments
cc: Eric Schimpf

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

**GLOBAL CONNECTION INC. OF AMERICA
DBA STANDUP WIRELESS FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER ON A
WIRELESS BASIS (LOW INCOME ONLY)**

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) DOCKET NO. UT-170560
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) AMENDED PETITION
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AMENDED PETITION

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for Global Connection Inc. of
America dba StandUP Wireless*

July 26, 2018

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**BEFORE THE WASHINGTON
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In the Matter of the Petition of)	DOCKET NO. UT-170560
GLOBAL CONNECTION INC. OF AMERICA)	AMENDED PETITION
DBA STANDUP WIRELESS FOR)	
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TELECOMMUNICATIONS CARRIER ON A)	
WIRELESS BASIS (LOW INCOME ONLY))	

AMENDED PETITION

I. INTRODUCTION

Global Connection Inc. of America dba StandUP Wireless (“StandUP Wireless”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and Section 480-123-030 of the Washington Administrative Code (“WAC”), hereby submits this Amended Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Washington. For convenience, this Amended Petition is intended to replace, in entirety, the version filed on May 30, 2017. StandUP Wireless seeks ETC designation solely to provide Lifeline service to qualifying Washington consumers; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high cost areas.³

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that StandUP Wireless only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to StandUP Wireless.

As demonstrated herein, and as certified in Exhibit 1 to this Petition, StandUP Wireless meets all the statutory and regulatory requirements for designation as an ETC in the State of Washington, including the requirements outlined in the FCC’s *USF/ICC Transformation Order*,⁴ *Lifeline and Link Up Reform Order*,⁵ and recent *Lifeline Modernization Order*.⁶ Rapid grant of StandUP Wireless’s request, moreover, would advance the public interest because it would enable StandUP Wireless to commence much needed Lifeline service to low-income Washington residents as soon as possible. Accordingly, StandUP Wireless respectfully requests that the Washington Utilities and Transportation Commission (“Commission”) expeditiously approve this Petition for ETC designation.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Petition should be addressed to:

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Global Connection Inc. of America dba StandUP Wireless
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

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 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. 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*”).

⁵ *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 and Link Up Reform Order*”).

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*Third Report and Order*” or “*Lifeline Modernization Order*”).

II. BACKGROUND

A. Company Overview

Global Connection Inc. of America (“Global Connection”) is a Georgia Corporation authorized to transact business in the State of Washington.⁷ Its principal office is located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global Connection is currently a wholly owned subsidiary of Global Connection Holdings Corporation (“Global Holdings”), a U.S. company whose principal place of business is located at 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093. Global Holdings operates as a holding company for Global Connection and does not provide telecommunications services. Global Connection does not have any operating companies or telecommunications affiliates.⁸

Global Connection provides or is registered to provide prepaid wireline local exchange and/or long distance services to residential customers in twenty-six (26) states,⁹ and is designated as an ETC to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states.¹⁰ Global Connection provides prepaid wireless telecommunications services under its d/b/a StandUP Wireless in twenty-six (26) territories,¹¹ and is designated as an ETC on a

⁷ Global Connection was incorporated in the State of Georgia on June 1, 1998.

⁸ Following the proposed change in Global Connection’s majority ownership described further herein, the Company’s corporate and trade names and identifiers will remain unchanged and it will continue to have no separate operating companies; however, it will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless as discussed in detail in Section III.I herein, and Cintex Wireless, LLC, a Maryland limited liability company providing Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and wholesale wireless telecommunications services.

⁹ Those states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, Washington, West Virginia and Wisconsin. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

¹⁰ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

¹¹ Those territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

wireless basis in all twenty-six (26) of its wireless service territories. StandUP Wireless currently has applications for wireless ETC designation pending with Hawaii, New Jersey and with the FCC (for Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia); no such petitions have been denied.

StandUP Wireless provides commercial mobile radio service (“CMRS”) by using the Sprint Spectrum L.P. (“Sprint”) and T-Mobile USA (“T-Mobile”) (collectively, “Underlying Carriers”) networks on a wholesale basis. StandUP Wireless obtains from its Underlying Carriers the network infrastructure and wireless transmission facilities to allow StandUP Wireless to operate as a Mobile Virtual Network Operator (“MVNO”), similar to TracFone Wireless, Inc. (“TracFone”) and YourTel America Inc. (“YourTel”), who have been granted ETC status by the Commission.¹²

StandUP Wireless’s prepaid wireless services are affordable and attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. StandUP Wireless offers consumers affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of its customers in other jurisdictions, StandUP Wireless anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. StandUP Wireless

¹² *Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Washington for the Limited Purposes of Offering Lifeline and Link Up Service to Qualified Households, As Amended*, Order 03, Docket No. UT-093012 (June 24, 2010) (“*TracFone ETC Order*”); *Petition of YOURTEL AMERICA, INC. for an Exemption from WAC 480-123-030(1)(d), (f) and (g), and Designation as an Eligible Telecommunications Carrier*, Order 01, Docket No. UT-110423 (June 16, 2011) (“*YourTel ETC Order*”).

does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless and broadband plans to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, StandUP Wireless will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

B. Proposed Lifeline Offering

StandUP Wireless has the ability to provide all services supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Washington. StandUP Wireless intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and broadband usage. StandUP Wireless's prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, StandUP Wireless will receive support from the Lifeline program as compensation for providing those services.

StandUP Wireless commits that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. StandUP Wireless' Lifeline-supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward. To the extent StandUP Wireless provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and StandUP Wireless will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

StandUP Wireless intends to launch a unique initiative aimed at ensuring Lifeline-eligible veterans and military personnel are made aware of the program. Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline service offerings, which offers the following plan options at no net cost to the Lifeline customer after application of Lifeline support:¹³ (1) Voice Plan. 750 minutes, unlimited text messages and 100 megabytes (MB) of data per month; or (2) Broadband Plan. 500 voice minutes, unlimited text messages, and 1 gigabyte (GB) of data per month. All Lifeline plans will also include a free handset and access to the following custom calling features at no charge: (1) Caller ID; (2) Call Waiting; (3) Call Forwarding; (4) 3-Way Calling; and (5) Voicemail.

Lifeline customers will have the ability to purchase additional airtime as needed. At this time, additional credits may be purchased at the rate of \$5.00 for 200 credits; \$10.00 for 450 credits; \$20.00 for 1000 credits, \$30.00 for 1500 credits; and \$50.00 for 2500 credits by calling our toll-free number. Each credit provides one (1) minute of airtime or one (1) SMS text message. Additional data may also be purchased, currently at the rate of \$3.95 for 250 MB; \$7.95 for 500 MB; and \$15.95 for 1 GB.

Customers may use their minutes to place domestic long distance calls at no additional charge. Calls to StandUP Wireless customer service made by customers via their StandUP Wireless handset will not deplete the customer's available airtime. StandUP customers can contact customer service by dialing a short code (e.g. *611) from their StandUP Wireless phone to address billing, service and general account issues. Customers whose balance of voice

¹³ Lifeline prices reflect application of federal Lifeline subsidy and an additional Company discount. The Company's Lifeline terms and conditions can be found at www.StandUpWireless.com. Given the FCC's proposed limitation of enhanced tribal support to only facilities-based providers, the Company does not propose an enhanced tribal Lifeline plan option at this time (*see* WC Docket No. 09-197, FCC 17-155, *Fourth Report and Order* released Dec. 1, 2017, section II.D-E; the proposed rule would be effective the later of August 1, 2018 or 90 days after announcement of approval from the Office of Management and Budget (OMB)).

minutes has been exhausted will still be able to make outbound calls to StandUP Wireless customer service as long as their service is active. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

StandUP Wireless's Lifeline offering will allow feature-rich mobile and broadband connectivity for qualifying subscribers at no cost to the subscriber after application of Lifeline support, without the burden of credit checks or service contracts. StandUP Wireless's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

C. Plan Enrollment

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to StandUP Wireless's website, which will contain information regarding StandUP Wireless's Lifeline service plans, and a description of the Lifeline program and eligibility criteria. Customers may request that an enrollment form (hereinafter also referred to as application or certification form) be mailed to them, complete the online application, download a form from the Internet or retrieve a form in person at a Company event. The application/certification form, a sample of which is attached as Exhibit A of Exhibit 3 (the Company's approved FCC Compliance Plan), will explain in clear, easily understandable language the following disclosures:¹⁴

- (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program;
- (2)

¹⁴ See 47 C.F.R. § 54.410(d)(1). StandUP Wireless will comply with the requirement to utilize the USAC standard application/certification form beginning July 1, 2018; See *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC's website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.

The application/certification form will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.¹⁵ If not applying in person, the applicant must return the signed enrollment form and any supporting documentation to the address provided by StandUP Wireless. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under the Company's supervision by managers experienced in the administration of the Lifeline program.

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. StandUP Wireless will annually re-certify the continued eligibility of all of its Lifeline subscribers in accordance with federal and Commission regulations, and the Company's certification form will also require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by FCC rules (47 C.F.R. § 54.410(d) and (f)). StandUP Wireless will certify and verify consumer eligibility in accordance with 47 C.F.R. § 54.410, utilizing the streamlined eligibility criteria implemented by the *Lifeline Modernization Order* (see 47 C.F.R. § 54.409), and will work with the Department

¹⁵ See 47 C.F.R. § 54.405(c).

of Social and Health Services (“DSHS”) to verify initial and ongoing consumer eligibility in Washington. See Exhibit 3 for more detailed enrollment information.¹⁶

D. Prevention of Waste, Fraud and Abuse

StandUP Wireless recognizes the importance of safeguarding the USF. StandUP Wireless will notify its subscribers at service initiation about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage. Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company’s Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as “usage” is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), StandUP Wireless will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber’s failure to use the Lifeline service within the notice period will result in service termination for non usage. Customers that have been deactivated may participate in the Company’s Lifeline service in the future by reapplying and re-establishing eligibility.

StandUP Wireless has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. The Company complies with the requirements of the National Lifeline Accountability Database (“NLAD”) and section 54.404 of the FCC’s rules. As such, the Company (or Eligibility Administrator, where applicable) queries

¹⁶ See also the Company’s Revised Compliance Plan filed April 16, 2018 and currently pending with the FCC: [https://ecfsapi.fcc.gov/file/10416110300883/Global%20Connection%20FCC%20Amended%20Wireless%20\(%2B%20Wireline\)%20CP%20\(April%202018\).pdf](https://ecfsapi.fcc.gov/file/10416110300883/Global%20Connection%20FCC%20Amended%20Wireless%20(%2B%20Wireline)%20CP%20(April%202018).pdf).

the NLAD for every enrollment¹⁷ to determine whether a prospective subscriber is currently receiving a Lifeline service from StandUP Wireless or any other ETC, and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.¹⁸ In addition, Company personnel emphasize the “one Lifeline service per household” restriction in their direct sales contacts with potential customers. Moreover, the FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier (“National Verifier”), which transfers the responsibility of eligibility determination away from Lifeline providers.¹⁹ StandUP Wireless will utilize the National Verifier, once in place, to determine initial and ongoing eligibility of Washington Lifeline subscribers.

To further protect the integrity of the USF, StandUP Wireless has contracted with CGM, LLC of Roswell, Georgia, a Lifeline service bureau, to edit all subsidy request data. CGM will process and validate StandUP Wireless’s subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from StandUP Wireless will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM’s systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, StandUP Wireless ensures that it does not over-request from support funds.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Act (47 U.S.C. § 214(e)(2)) provides state public utility commissions with the “primary responsibility” for the designation of ETCs. Although Section

¹⁷ With the limited exception of states that have opted out of the NLAD. In those states, the Company will query the state duplicates database.

¹⁸ See *Lifeline and Link Up Reform Order* ¶ 203.

¹⁹ See *Lifeline Modernization Order*, section III.C.

332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.²⁰ Therefore, the Commission has the authority to designate StandUP Wireless as an ETC. Pursuant to this authority, the Commission has designated numerous carriers as ETCs in the State of Washington, including many wireless carriers.²¹

Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). StandUP Wireless recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.²² Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: "[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section." As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore, may not apply the facilities-based requirement to StandUP Wireless. Therefore, the Commission has

²⁰ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("USF Order").

²¹ See e.g., *In the Matter of the Petition of RCC Minnesota, Inc. d/b/a Cellular One for Designation as an Eligible Telecommunications Carrier, Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-023033 (Aug. 14, 2002); See also *Tracfone ETC Order* and *YourTel ETC Order*.

²² See *Lifeline and Link Up Reform Order* at ¶ 368.

the authority to act under Section 214(e)(2) of the Act and to grant StandUP Wireless's request for designation as an ETC throughout the State of Washington.

IV. STANDUP WIRELESS SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.²³ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services,²⁴ and provide additional information set forth in 47 C.F.R. § 54.202(a). As detailed below, StandUP Wireless satisfies each of the above-listed requirements.

A. StandUP Wireless Will Provide Service Consistent with the FCC's Grant of Forbearance from Section 214's Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as StandUP Wireless. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-

²³ See *USF Order*, at 8858-59, ¶ 145.

²⁴ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:²⁵

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

In accordance with the *Lifeline and Link Up Reform Order*, StandUP Wireless filed a Compliance Plan with the FCC, which the FCC approved on May 25, 2012.²⁶ A copy of its FCC-approved Compliance Plan is attached hereto as Exhibit 3.²⁷ StandUP Wireless commits to providing Lifeline service in Washington in accordance with its approved Compliance Plan and applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

B. StandUP Wireless Is a Common Carrier

StandUP Wireless is a resale-based CMRS provider, and is thus a common carrier.²⁸

²⁵ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

²⁶ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

²⁷ See *supra* note 16.

²⁸ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory “mobile services” category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) (“mobile services” providers are common carriers); see also *PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) (“We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.”) [emphasis added].

C. StandUP Wireless Will Provide All Required Supported Services

Through its Underlying Carriers, StandUP Wireless is able to provide all of the supported services required by Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)), as follows:

1. Broadband Internet Access Service

Broadband Internet access service ("BIAS") is a supported service as of December 2, 2016. The FCC has stated that broadband access consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."²⁹ StandUP Wireless will provide this service via resale of its Underlying Carriers' wireless services.

2. Voice Telephony Service

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

Voice Grade Access to the Public Switched Telephone Network. StandUP Wireless provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Underlying Carriers.

Local Usage. As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. StandUP Wireless offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. StandUP Wireless provides 911 and E911 access for all of its customers, regardless of activation status and availability of minutes, to the extent the local

²⁹ See 47 C.F.R. § 8.2(a) (defining broadband Internet access service); see also 47 C.F.R. §54.101(a)(2).

government in its service area has implemented 911 or E911 systems. StandUP Wireless also complies with the FCC's regulations governing access to emergency services, the deployment and availability of E911 compatible handsets, and availability of text-to-911 features.

Toll Limitation for Qualified Low-Income Customers. In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.³⁰ "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."³¹ Nonetheless, StandUP Wireless's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. StandUP Wireless's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.

D. StandUP Wireless Will Advertise the Availability of Supported Services

StandUP Wireless will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2) of the FCC's regulations. StandUP Wireless's advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined in StandUP Wireless's Compliance Plan.³² StandUP Wireless will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as the Internet, mass media, outreach events, and community and charitable involvement. StandUP Wireless will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer

³⁰ See *Lifeline and Link Up Reform Order* at ¶ 367.

³¹ See *Lifeline and Link Up Reform Order* at ¶ 49.

³² See Exhibit 3, section I.F, and supra note 16. See also *Lifeline and Link Up Reform Order* at Section VII.F, and 47 C.F.R. § 54.405(c).

segment. StandUP Wireless may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service. In addition, StandUP Wireless intends to utilize its network of retail partners (once established) to help promote the availability of its Lifeline plans, especially retail outlets that are frequented by low income consumers (such as MoneyGram locations). StandUP Wireless will provide retail partners with signage to be displayed and with printed materials describing StandUP Wireless's Lifeline program.³³

E. StandUP Wireless Requests Designation Throughout Its Service Area in Washington

StandUP Wireless is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, StandUP Wireless is required to describe the geographic area(s) within which it requests designation as an ETC. StandUP Wireless requests designation as an ETC that is statewide in scope, subject to the existence of its Underlying Carriers' facilities and corresponding coverage, and excluding any tribal lands.³⁴ StandUP Wireless understands that its service area may overlap with rural carriers in Washington, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. It does not seek and will not accept Link-Up or high cost support.

F. Service Commitment Throughout the Proposed Designated Service Area

StandUP Wireless provides service in Washington by reselling service which it obtains

³³ See attached Exhibit 4 for a sample advertisement.

³⁴ A list of areas in which StandUP Wireless requests ETC designation is attached hereto as Exhibit 5.

from its underlying facilities-based providers. The providers' networks are operational and largely built out. Thus, StandUP Wireless will be able to commence offering its Lifeline service to all locations served by its Underlying Carriers very soon after receiving approval from the Commission. In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification, StandUP Wireless commits to comply with the service requirements applicable to the support that it receives. Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.³⁵

G. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. §54.202(a)(2), StandUP Wireless has the ability to remain functional in emergency situations. As discussed, StandUP Wireless will utilize the extensive and well-established Sprint and/or T-Mobile networks and facilities to provide its Lifeline services. The Company understands that the Underlying Carrier networks have access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Indeed, these Underlying Carriers have repeatedly certified to the FCC that their networks function in emergency situations.³⁶ The Underlying Carriers provide the same functionality to StandUP Wireless and its customers as these carriers provide to themselves and their own customers.

H. Commitment to Consumer Protection and Service Quality

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable

³⁵ See also *Lifeline and Link Up Reform Order* at ¶ 386.

³⁶ See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

consumer protection and service quality standards, and for wireless applicants, a commitment to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service satisfies this requirement.³⁷ StandUP Wireless hereby commits to comply with the CTIA Consumer Code for Wireless Service.

I. StandUP Wireless is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), StandUP Wireless is financially and technically capable of providing Lifeline-supported services.³⁸ Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates revenues from non-Lifeline services; consequently, Global Connection has not relied (and does not intend to rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In the event that USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. In addition, StandUP Wireless has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to StandUP Wireless through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement dated February 16, 2017, by and among Global Connection, Global Holdings, and Odin Mobile, LLC ("Odin Mobile") (collectively, the "Parties"), Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary (the

³⁷ See 47 C.F.R. § 54.202(a)(3).

³⁸ See Exhibit 6 for financial information, which is confidential and proprietary.

“Transaction”).³⁹ A majority (ninety-nine percent (99%)) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁴⁰ A diagram of the corporate structure of Global Connection and Odin Mobile both pre-Transaction and post-close is provided as Exhibit 7.

Odin Mobile is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless service, including to visually impaired consumers by using the T-Mobile and Sprint wireless networks through the Mobile Virtual Network Enabler (“MVNE”) Prepaid Wireless Wholesale, LLC (“PPWW”), which is owned by Paul Greene. Odin Mobile purchases wireless services (for voice minutes, text messages, mobile data, etc.) from PPWW, a Maryland limited liability company, on a wholesale basis, packages those services into Odin Mobile’s own service plans and pricing, and bundles the wireless service with Odin Mobile’s handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile currently provides wireless service in 49 states and Puerto Rico. Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. Upon approval of the transaction, Odin Mobile will own 75% of Global Connection and plans to transfer all prepaid wireless operations to Global Connection.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC (“PWG”), an MVNE that supplies airtime through the T-Mobile network.

³⁹ The Parties are in the process of obtaining all required approvals for the proposed Transaction from the FCC and all applicable state regulatory authorities.

⁴⁰ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator (“MVNO”) market. PWG and PPWW have no foreign ownership and, like Global Connection, are not foreign carriers and are not affiliated with foreign carriers in any market. PWG is one of the nation’s longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are inter-connected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator. PWG’s network infrastructure and T-Mobile relationship enables PWG to leverage

equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier's ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.⁴¹ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

⁴¹ Mr. Greene also owns interest in several other non-communications-related businesses.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless, LLC working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of Global Connection's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state.⁴² The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of

⁴² The FCC issued a Notice of Apparent Liability for Forfeiture ("NAL") to the Company on December 11, 2013 alleging that StandUP Wireless failed to comply with FCC rules by requesting and receiving reimbursement payments from the federal USF for intra-company duplicate Lifeline enrollments, a claim which the Company timely disputed. Even if the alleged duplicates actually were duplicates (which StandUP disputed), StandUP was still 99.38% effective at identifying and preventing duplicate enrollments. The Company entered into a Consent Decree with the FCC (Order released December 29, 2017, FCC 17-175) which resolved the NAL with no admission of liability by StandUP Wireless.

Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff. Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

J. StandUP Wireless Will Comply With Reporting Requirements

StandUP Wireless will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e. FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e. FCC Form 481), and other reports the Commission deems necessary as a condition of ETC designation. Furthermore, until implementation of the National Verifier, StandUP Wireless is willing to file with DSHS its customer records of the prior calendar year for customers enrolled based on eligibility programs within the DSHS database. The records will have all the necessary information and be in an electronic format required by DSHS. After DSHS notifies StandUP Wireless of the results of the review, StandUP Wireless will take appropriate measures to either correct the customer records or stop providing services to ineligible customers and report the resolutions to DSHS and the Commission within 60 days of the notice.

K. StandUP Wireless Will Comply With All Regulations Imposed By The Commission

By this Petition, StandUP Wireless hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon StandUP Wireless's provision of service contemplated by this Petition. Upon Commission request, StandUP Wireless is prepared to answer questions or present additional testimony or other

evidence about its services within the state. StandUP Wireless commits that 100% of federal universal service funds will flow through directly to Lifeline customers.

StandUP Wireless is willing to 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. StandUP Wireless is also willing to 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, and is willing to 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 StandUP Wireless's proprietary software and technical assistance should call delivery discrepancies be discovered.

L. StandUP Wireless Requests Exemption from Certain Provisions of WAC 480-123-030

StandUP Wireless requests that the Commission exempt it from the ETC petition requirements set forth in WAC 480-123-030(1)(d), (f) and (g). Subsection (d) requires ETCs to provide a substantive plan of the investments it will make using USF funds. This requirement applies to carriers that seek high-cost support to fund investments to their networks; however, StandUP Wireless seeks ETC designation solely for purposes of reimbursement for provision of subsidized low-income support services to eligible customers. Therefore, StandUP Wireless has no basis for filing an investment plan and should be exempt from the requirement.

Subsection (f) requires wireless carriers 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.

StandUP Wireless does not own, control, nor plan to develop cell sites, and StandUP Wireless's coverage area encompasses that of its Underlying Carriers in Washington. StandUP Wireless does not have access to underlying carrier service area maps showing the location of cell sites. Accordingly, StandUP Wireless requests exemption from this requirement.

Subsection (g) provides that a petition for ETC designation must contain information affirming that a company has the ability to remain functional in emergency situations, including information that demonstrates it has at least four hours of backup battery power at each cell site, backup generators at each microwave hub, and at least five hours of backup battery power and backup generators at each switch. As noted in Section IV.G of this Petition, StandUP Wireless has the ability to remain functional in emergency situations through its underlying carriers. StandUP Wireless does not own or operate any facilities, cell sites or microwave hubs, thus, StandUP Wireless should be exempt from the requirement that it demonstrate it has backup battery power or generators.

V. DESIGNATION OF STANDUP WIRELESS AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.⁴³ Designation of StandUP Wireless as an ETC in Washington will further that public interest. Whether because of financial constraints, poor credit history or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

⁴³ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating StandUP Wireless as an ETC would benefit low-income consumers eligible for Lifeline service in the State of Washington—the intended beneficiaries of universal service.

A. Advantages of StandUP Wireless’s Service Offering

The public interest benefits of StandUP Wireless’s wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime and data at no net cost, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, and 911/E911 service in accordance with current FCC requirements. The mobility of StandUP Wireless’s service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or work in migratory jobs. Wireless service offers a stable contact method where traditional landline service would be unavailable or not a viable option. StandUP Wireless’s prepaid wireless service is an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long term contract issues. For consumers with limited resources, the ability to meet their communications and broadband access needs while at the same time anticipating and controlling the associated costs is critical.

StandUP Wireless’s Lifeline program will provide low-income Washington residents with the convenience and security offered by wireless services—even if their financial position

deteriorates. StandUP Wireless’s Lifeline offering is an invaluable resource for emergency services and for cash-strapped consumers who may be seeking employment or simply need to maintain contact with family members. It is also a commonly accepted fact that in today’s market, consumers—including qualified Lifeline customers—view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location.

Furthermore, in an effort to expand awareness of the Lifeline program among veterans, StandUP Wireless has partnered with “Cell Phones for Soldiers,” a national non-profit organization that has been serving troops and veterans with free communication services and emergency funding based on private donations since 2004.⁴⁴ One of the barriers to expanding Lifeline to eligible consumers, veterans included, is determining *how* to effectively connect with those in need who are eligible. Cell Phones for Soldiers has an existing platform for communication with troops and veterans and over a decade of experience serving their needs. By partnering together, Cell Phones for Soldiers and StandUP Wireless will be able to better ensure that these low-income veterans are made aware of and able to benefit from the Lifeline program. Providing StandUP Wireless with the authority necessary to offer Lifeline services to Washington residents—including those who have dedicated their lives to protecting our country—who may be currently without access to or otherwise unable to afford essential telephone and broadband services, or in danger of losing wireless service altogether, undoubtedly promotes the public interest.

⁴⁴ See <https://www.cellphonesforsoldiers.com/>.

Finally, grant of StandUP Wireless’s Petition will serve the public interest in increasing the number of ETCs in Washington. By granting ETC status to StandUP Wireless, the Commission will enable StandUP Wireless to increase the number of Washington residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Washington. In sum, ETC designation in the State of Washington would enable StandUP Wireless to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, StandUP Wireless would provide “increased consumer choice, high-quality service offerings, and mobility,”⁴⁵ as well as the safety and security of effective 911 and E911 services.⁴⁶

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.⁴⁷ Designation of StandUP Wireless as an ETC will promote competition and innovation, spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. As an ETC, StandUP Wireless will ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.⁴⁸ Introducing StandUP Wireless into the market as an additional wireless ETC provider will afford low income Washington residents a wider choice of providers and available services, while enhancing a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

⁴⁵ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

⁴⁶ See *Id.* at 3391 ¶ 23.

⁴⁷ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

⁴⁸ See 47 U.S.C. § 254(b)(1).

C. Impact on the Universal Service Fund

StandUP Wireless's request for designation as an ETC solely for purposes of participating in the Lifeline program would not unduly burden the USF or otherwise reduce the amount of funding available to other ETCs. With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as StandUP Wireless or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same the Company's designation as an ETC; StandUP Wireless will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link-up Reform Order* and utilizing the NLAD and National Verifier (once in place), the likelihood that StandUP Wireless's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized.

StandUP Wireless's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers. According to the FCC, "the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest," and "A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of

the Lifeline program outweighs the potential costs.”⁴⁹

VI. ANTI-DRUG ABUSE CERTIFICATION

StandUP Wireless certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

VII. CONCLUSION

Based on the foregoing, designation of StandUP Wireless as an ETC in the State of Washington accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, StandUP Wireless respectfully requests that the Commission promptly designate StandUP Wireless as an ETC in the State of Washington.

Respectfully submitted,



Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for Global Connection Inc. of
America dba StandUP Wireless*

July 26, 2018

⁴⁹ See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

EXHIBIT 1

Certification of Company Officer

EXHIBIT 1

Certification

STATE OF GEORGIA)
)
CCOUNTY OF GWINNETT)

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Eric Schimpf, who first duly sworn upon oath, deposes and states that he is the Chief Operating Officer (COO) of Global Connection Inc. of America d/b/a StandUP Wireless, and has read the foregoing Petition and knows the contents thereof, and confirms that the statements made therein are true to the best of his knowledge and belief.



Eric Schimpf, Chief Operating Officer

Subscribed and sworn to before me this 21 day of May, 2018.


Notary Public

My Commission expires: April 3, 2020



EXHIBIT 2

Proposed Lifeline Offering

Global Connection Inc. of America d/b/a StandUP Wireless

Lifeline Offering

Terms & Conditions maintained at www.StandUpWireless.com

PLAN DESCRIPTION	VOICE	TEXT	DATA	LIFELINE PRICE
Voice Plan	750	Unlimited	100 MB	\$0.00
Broadband Plan	500	Unlimited	1 GB	\$0.00

Includes:

- Handset
- Access to Voicemail, Caller-ID, call waiting, three-way calling, & call forwarding features
- Free calls to 911 and StandUP Wireless customer service
- Domestic Long Distance at no extra cost
- Data at 3G+ speeds

Additional Minutes:

Price	Minutes
\$5.00	200
\$10.00	450
\$20.00	1000
\$30.00	1500
\$50.00	2500

Additional Data:

Price	Data
\$3.95	250 MB
\$7.95	500 MB
\$15.95	1 GB

EXHIBIT 3

StandUP Wireless's FCC-Approved Compliance Plan

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

April 30, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On March 8, 2012, Global Connection Inc. of America (“Global Connection”) submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ On April 10, 2012, Global Connection submitted a revised version with a minor revision to its Model Application/Certification Form, included as Exhibit A to its Compliance Plan. Based on a meeting with Commission staff, Global Connection has further revised and supplemented its compliance plan.

Global Connection has revised its Compliance Plan to: 1) confirm in footnote 3 that Global Connection will follow the requirements of its Compliance Plan in all states where it provides Lifeline service and receives reimbursements from the federal Low-Income fund; 2) provide additional detail regarding Global Connection’s enrollment process, Company personnel training and potential fraud detection in Sections I.B. and I.F.; 4) provide additional detail regarding Global Connection’s handset activation policy in Section I.E.; and 5) revise the agent use box in the Application/Certification Form in Exhibit A.

¹ See *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 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 30, 2012
Page Two

Global Connection hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, Global Connection reiterates its request for expeditious approval of its Compliance Plan.

This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Kim Scardino
Divya Shenoy
Charles Tyler
Garnet Hanly
Alex Minard

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.²

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Stand Up Wireless (dba), and Global Connection Holdings Corporation (holding company). This Compliance Plan applies only to Global Connection’s wireless Lifeline service offerings.

² See *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 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

Lifeline customers. Global Connection will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.³

Global Connection will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.⁴ This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Global Connection will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the low income fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company’s Lifeline service plan offerings.

³ See *Lifeline Reform Order*, ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission’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. Global Connection will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

⁴ In addition, this Compliance Plan is consistent with the compliance plan filed by Cricket Communications, Inc. See Notice of *Ex Parte* Communication of Cricket Communications, Inc., WC Docket No. 09-197 (Sept. 23, 2011) (“Cricket Compliance Plan”). The Wireline Competition Bureau approved the Cricket Compliance Plan on February 7, 2012. See *Telecommunications Carriers Eligible for Universal Service Support, Cricket Communications, Inc. Petition for Forbearance*, WC Docket No. 09-197, Order, DA 12-158 (Feb. 7, 2012).

ACCESS TO 911 AND E911 SERVICES⁵

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.⁶ The Company will comply with these conditions starting on the effective date of the *Lifeline Reform Order*.

The Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint and Verizon Wireless as its underlying network provider/carrier. Sprint and Verizon Wireless route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers. To the extent that Sprint or Verizon Wireless is certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended.

⁵ See Compliance Plan Public Notice at 3.

⁶ See *Lifeline Reform Order*, ¶ 373.

Finally, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. The Company uses phones from BDI Logistics LLC that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE⁷

A. Policy

Global Connection will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules (when it becomes effective on June 1, 2012), as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a

⁷ See Compliance Plan Public Notice at 3.

household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

More than 90 percent of Global Connection's customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet. At such events, Global Connection requires all prospective customers to show a valid government-issued photo identification, which is electronically scanned to detect alterations. Each prospective customer is checked against Global Connection's internal database in real-time to ensure that the customer does not already receive a Lifeline benefit from the Company before the customer is enrolled.

As discussed in further detail in Section I.F. below, all employees or agents ("Company personnel") that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company

personnel will review documentation establishing eligibility pursuant to the Lifeline rules.⁸ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.⁹

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.¹⁰ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.¹¹

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's

⁸ See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B); Cricket Compliance Plan at 4.

⁹ See Cricket Compliance Plan at 6.

¹⁰ See *Lifeline Reform Order*, ¶ 101.

¹¹ *Id.* and section 54.410(c)(1)(i)(B).

Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.¹²

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.¹³ The Company will not retain a copy of this documentation.¹⁴ Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection.¹⁵ In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.¹⁶

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹⁷ A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

¹² See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

¹³ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹⁴ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁵ See Cricket Compliance Plan at 6.

¹⁶ See *id.*

¹⁷ See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

C. Subscriber Certifications for Enrollment

Global Connection will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.¹⁸ The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally.¹⁹ Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.²⁰ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.²¹

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a

¹⁸ *Lifeline Reform Order*, ¶ 61; section 54.410(a).

¹⁹ *See* Cricket Compliance Plan at 3.

²⁰ *See* Model Application/Certification Form, included as Exhibit A. *See* Compliance Plan Public Notice at 3.

²¹ *See Lifeline Reform Order*, ¶ 123.

household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.²²

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.²³

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²⁴

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name;²⁵ (2) the applicant's full residential address (P.O. Box is not sufficient²⁶); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from

²² See *id.*, ¶ 121; section 54.410(d)(1).

²³ See section 54.405(c).

²⁴ See *Lifeline Reform Order*, ¶ 114.

²⁵ See Cricket Compliance Plan at 4.

²⁶ See *Lifeline Reform Order*, ¶ 87.

which the applicant, his or her dependents, or his or her household receives benefits;²⁷ and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁸

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,²⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service;³⁰ (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's

²⁷ See Cricket Compliance Plan at 4.

²⁸ See section 54.410(d)(2). See Cricket Compliance Plan at 4.

²⁹ See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

³⁰ See Cricket Compliance Plan at 4.

knowledge;³¹ (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.³² The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.³³

D. Annual Verification Procedures

Global Connection will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's

³¹ See *id.* at 5.

³² See *id.*

³³ See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.* See also Cricket Compliance Plan at 5.

knowledge, the subscriber's household is receiving no more than one Lifeline service.³⁴ Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.³⁵

2012 Verification. Global Connection will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.³⁶ The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

Verification De-Enrollment. Global Connection will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.³⁷ The Company will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

³⁴ See *Lifeline Reform Order*, ¶ 120 and Cricket Compliance Plan at 8.

³⁵ See *Lifeline Reform Order*, ¶ 145.

³⁶ See *id.*, ¶ 130.

³⁷ See *Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

E. Activation and Non-Usage

Global Connection will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.³⁸ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁹ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.⁴⁰

³⁸ See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

³⁹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3). See Cricket Compliance Plan at 2 (stating that it did not need to implement a non-usage policy because it offered only plans with unlimited local and long distance calling).

⁴⁰ See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴¹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.⁴²

In addition to checking the database when it becomes available, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers.⁴³ Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction.⁴⁴ All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and pass a Company issued exam. The training will be updated as needed, but at least every 90 days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters.

⁴¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁴² See Cricket Compliance Plan at 9.

⁴³ See *id.* at 6, 9.

⁴⁴ See *id.*

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁴⁵

One-Per-Household. Global Connection will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household⁴⁶ through the use of its application and certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company’s Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁴⁷ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission’s one-

⁴⁵ See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *id.*, ¶¶ 189-195; section 54.404(b)(6). Further, Company will update each subscriber’s information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

⁴⁶ A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

⁴⁷ See *Lifeline Reform Order*, ¶ 78 and Cricket Compliance Plan at 7.

per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁴⁸ Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, Global Connection will verify with the subscriber every 90 days that the subscriber continues to rely on that address.⁴⁹

Finally, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service,⁵⁰ (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) what documentation is necessary for enrollment; (7) Global Connection's name (the ETC); and (8) consumers who willfully make a false statement in order to

⁴⁸ *Id.*

⁴⁹ *See Lifeline Reform Order*, ¶ 89.

⁵⁰ *See Cricket Compliance Plan* at 4.

obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.⁵¹ These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.⁵² This specifically includes the Company's website (www.StandUpWireless.com) and outdoor signage.⁵³ A sample of the Company's marketing materials is included as Exhibit B.

G. Company Reimbursements From the Fund

To ensure that the Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁴ Further, the Company will transition the submission of its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month, and inform USAC, to the extent it deems necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.⁵⁵ In addition, the Company will keep accurate records as directed by USAC⁵⁶ and as required by new section 54.417 of the Commission's rules.

⁵¹ See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

⁵² *Id.*

⁵³ *Id.*

⁵⁴ See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

⁵⁵ See *Lifeline Reform Order*, ¶¶ 302-306.

⁵⁶ See section 54.407(e).

H. Annual Company Certifications

The Company will submit an annual certification to USAC, signed by a Global Connection officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁵⁷ (2) is in compliance with all federal Lifeline certification procedures;⁵⁸ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁵⁹

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁶⁰ Further, as discussed above, Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁶¹

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁶² the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁶³ The

⁵⁷ See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

⁵⁸ See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

⁵⁹ See section 54.416(a)(3).

⁶⁰ See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

⁶¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁶² See section 54.422(c).

⁶³ See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁶⁴ Finally, Global Connection will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.⁶⁵

I. Cooperation with State and Federal Regulators

Global Connection has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;⁶⁶
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

⁶⁴ See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

⁶⁵ See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

⁶⁶ The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁶⁷ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.⁶⁸

II. Description of Lifeline Service Offerings⁶⁹

Global Connection will offer its wireless Lifeline service in the states where it is designated as an ETC⁷⁰ and throughout the coverage area of its underlying provider(s) Sprint and Verizon Wireless. The Company’s Lifeline offering will provide customers with 100 anytime prepaid minutes per month, plus 100 anytime text messages, with rollover, at no charge. Additionally, the Company will offer a 250 anytime talk and text plan without rollover (one minute of talk time for each text). Lifeline customers can purchase additional bundles of minutes in denominations of \$5 (40 minutes), \$10 (100 minutes), \$20 (250 minutes), \$30 (500 minutes) and \$50 (1000 minutes). Airtime “top-up” minutes are available for purchase at the Company’s retail locations, through customer service and on its website. Text messaging is available at the rate of one minute of talk time per text message. Additional information regarding the Company’s plans, rates and services can be found on its website www.StandUpWireless.com.

In addition to free voice services, Global Connection’s Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All plans include domestic long-distance at no extra per minute charge.

⁶⁷ See section 54.405(e)(1).

⁶⁸ See Cricket Compliance Plan at 10.

⁶⁹ See Compliance Plan Public Notice at 3.

⁷⁰ Global Connection is currently designated as an ETC in Arkansas, Louisiana, Maryland, Missouri and West Virginia.

Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷¹

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷² The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April, 2011. The Company generates substantial revenues from non-Lifeline services and has access to capital from its investors. The majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Consequently, Global Connection has not relied, and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

⁷¹ See Compliance Plan Public Notice at 3.

⁷² See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁷³ Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁷⁴ The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, Global Connection will not provide toll limitation service ("TLS"), which allows low income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance

⁷³ Compliance Plan Public Notice at 3.

⁷⁴ 47 C.F.R. § 54.202(a)(1).

toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁷⁵

IV. Conclusion

Global Connection submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan
Kelley Drye & Warren LLP
3050 K Street, NW
Suite 400
Washington, D.C. 20007
(202) 342-8544

*Counsel to Global Connection Inc. of
America*

April 30, 2012

⁷⁵ See *Lifeline Reform Order*, ¶ 230.

EXHIBIT A



Global Connection Inc. of America D/B/A StandUP Wireless
State Wireless Lifeline Service Application and Certification

Global Connection Inc. of America

Mail or fax form completed and signed form to:
Fax 1.888.878.9323 / Customer Service: 1.800.544.4441

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America D/B/A StandUP Wireless ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service 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.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

- | | |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> National School Lunch Program's free lunch program |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines |

Customer Application Information:

First Name: _____ Middle Name: _____ Last Name: _____

Date of Birth: Month: ___ Day: ___ Year: _____ Last Four Digits of Social Security Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____

Home Telephone Number (if available): _____

Residential Address (P.O. Box NOT sufficient)

Number: _____ Apt: _____ Street _____ City _____

State: _____ Zip Code: _____

Address is (choose one): Permanent Temporary

Billing Address (if different from Residential Address) (P.O. Box IS sufficient)

Number: _____ Apt: _____ Street _____ City _____

State: _____ Zip Code: _____

Multiple households sharing and address:

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling 1.877.283.3890. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

Additional certifications: I hereby certify, under penalty of perjury, that (Check the box next to each line):

- I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- I am not listed as a dependent on another person's tax return (unless over the age of 60)
- The address listed below is my primary residence, not a second home or business
- If I move to a new address, I will provide that new address to the Company within 30 days
- If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature: _____ **Date:** _____

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):					
<p>Documents Acceptable Proof for Income-Eligibility (check 1):</p> <ul style="list-style-type: none"> <input type="checkbox"/> The prior year's state, federal, or Tribal tax return, <input type="checkbox"/> Current income statement from an employer or paycheck stub, <input type="checkbox"/> A Social Security statement of benefits, <input type="checkbox"/> A Veterans Administration statement of benefits, <input type="checkbox"/> A retirement/pension statement of benefits, <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or <input type="checkbox"/> A divorce decree, child support award, or other official document containing income information for at least three months time. 	<ul style="list-style-type: none"> <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) <input type="checkbox"/> Supplemental Security Income (SSI) <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) <input type="checkbox"/> National School Lunch Program's free lunch program <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) <input type="checkbox"/> Tribally Administered TANF (TATNF) <input type="checkbox"/> Head Start (meeting income qualifying standards) <input checked="" type="checkbox"/> State Program 1 <input checked="" type="checkbox"/> State Program 2 				
<p>Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):</p> <p><u>List A - Choose 1</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) <input type="checkbox"/> Medicaid 	<p><u>List B - Choose 1:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Program participation card/document <input type="checkbox"/> Prior year's statement of benefits <input type="checkbox"/> Notice letter of participation <input type="checkbox"/> Other official document evidencing participation 				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Applicant Account Number</td> <td style="width: 50%; text-align: center;">Agent/Dealer Number</td> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Applicant Account Number	Agent/Dealer Number			
Applicant Account Number	Agent/Dealer Number				

EXHIBIT B

FREE
CELL PHONE
FREE MINUTES & TEXTS

See reverse for more info!

250
MINUTES

EACH MONTH.
EVERY MONTH.



ALL qualifying customers get:

FREE Cell Phone
& Activation

1.800.544.4441

www.StandUpWireless.com



Complaints concerning Lifeline/ Linkup service can be directed to the
XXXXX Public Service Commission's Consumer Affairs Unit at 000-000-0000.

FREE
CELL PHONE
FREE MINUTES & TEXTS

See reverse for more info!

100
ANYTIME MINUTES
100
TEXT MESSAGES

EACH MONTH.
EVERY MONTH.
WITH ROLLOVER



ALL qualifying customers get:

FREE Cell Phone
& Activation

1.800.544.4441

www.StandUpWireless.com



Complaints concerning Lifeline/ Linkup service can be directed to the
XXXXX Public Service Commission's Consumer Affairs Unit at 000-000-0000.



1.800.544.4441

www.StandUpWireless.com



IMPORTANT LIFELINE WIRELESS SERVICE INFORMATION:

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. You must use your phone to continue to receive service.** Should you not use your service for 60 days you will be de-enrolled. **Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll.** Proof may consist of eligible program card or statement of benefits.

Global Connection Inc. of America

EXHIBIT 4

Sample Advertisement

stand up
WIRELESS

FREE*

CELL PHONE
& FREE ACTIVATION

CALL US TODAY:
800-544-4441

This is a Lifeline service. Lifeline is a government assistance program. Your Lifeline Benefit is non-transferable. Proof of eligibility is required and only eligible customers may enroll. Only one Lifeline discount per household. Consumers who willfully make a false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment or being barred from the program. Plans include 750 Anytime Minutes, Unlimited SMS, and 100 MB of data each month of service, as well as a discount off of any premium plan.

Global Connection Inc. of America d/b/a/ StandUP Wireless.

Visit www.StandUPWireless.com for complete terms & conditions

EXHIBIT 5

Coverage Area

CLLI	ILEC/COMPANY NAME	RATE CENTER
BLKIWAXX	CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN
ESNDWAXA	CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN
FRHRWAXA	CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN
LOPZWAXX	CENTURYTEL OF INTER-ISLAND, INC. DBA CENTURYLINK	SAN JUAN
ALMRWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ALMIRA
ARLTWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FOX ISLAND
ASLKWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	AMES LAKE
BSCTWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL
CETNWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CRESTON
CHNYWAXC	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CHENEY
CLBYWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS
CLCYWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	COULEECITY
CLWRWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS
CNNLWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL
CRNTWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CARNATION
CRTSWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CURTIS
CTHLWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CATHLAMET
DVPTWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	DAVENPORT
EDWLWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	EDWALLTYLR
ELTPWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MATHEWSCOR
FLCYWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FALL CITY
FRKSWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS
GGHRWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FOX ISLAND
GGHRWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	GIG HARBOR
HRTNWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	HARRINGTON
KGTNWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	KINGSTON
KHLTWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL
LINDWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LIND
LKBYWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FOX ISLAND
LNBNWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LONG BEACH
MDLKWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MEDICAL LK
MESAWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CONNELL
MNTSWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MONTESANO
MTCOWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	MATHEWSCOR
NBNDWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	NORTH BEND
NHBYWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	FORKS
OCPKWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	LONG BEACH
ODSSWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ODESSA
ORNGWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	ORTING
PEELWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CURTIS
PGISWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	CATHLAMET
RRDNWAXX	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	REARDAN
RYCYWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	OTHELLO
RYMNWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SOUTH BEND
SBNDWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SOUTH BEND
SPNGWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPANGLE

CLLI	ILEC/COMPANY NAME	RATE CENTER
SPRGWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	SPRAGUE
TWISWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	TWISP
VSHNWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VASHON
VSHNWAXB	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	VASHON
WLBRWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WILBUR
WNTHWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WINTHROP
WNTHWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	TWISP
WSHTWAXA	CENTURYTEL OF WASHINGTON, INC. DBA CENTURYLINK	WASHTUCNA
ELBGWAXA	ELLENSBURG TELEPHONE CO.	ELLENSBURG
ELBGWAXA	ELLENSBURG TELEPHONE CO.	SELAH
ELBGWAXA	ELLENSBURG TELEPHONE CO.	THORP
ACMEWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
ALGRWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
ANCRWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
ARTNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
BGLKWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
BLANWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
BNCYWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BENTONCITY
BOTHWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BOTHELL
BOTHWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
BRBAWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
BRPTWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BRIDGEPORT
BRWSWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BREWSTER
BURLWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
BURLWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
CAMSWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS
CHLNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
CLVWWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH
CMISWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
CNCRWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
CNWWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
CPVLWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAK HARBOR
CRLWWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CURLEW
CSHRWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
CSTRWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
DMNGWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
DRTNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
DVLLWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BOTHELL
EDSNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
ENTTWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
EVRTWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
EVRTWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT
EVRTWAXC	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT
EVRTWAXF	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT
EVRTWAXH	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT
EVRTWAXS	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT

CLLI	ILEC/COMPANY NAME	RATE CENTER
EVSNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
EWNCWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
FNDLWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
FRFDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD
GRFLWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
GRLDWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GRAYHARBCO
HLLKWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	HALLS LAKE
HMTNWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
JUNTWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
KNWCWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK
KNWCWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK
KNWCWAXC	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KENNEWICK
KRLDWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
LACNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
LARLWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
LATHWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD
LKGWWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
LKSTWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	EVERETT
LKWNWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
LVWOWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
LYNDWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
MLDNWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA
MLSNWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MOLSON
MNFDWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	DOUGLASCO
MNSNWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
MONRWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH
MPFLWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
MRBLWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
MRWYWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	HALLS LAKE
MTVRWAXF	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
MYVIWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
OKHRWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	OAK HARBOR
PLMNWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	PULLMAN
RCBHWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHMND BCH
RCFRWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROCKFORD
RCLDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND
RCLDWAXB	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND
RDMDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	BELLEVUE
RDMDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
RDMDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SEATTLE
ROSLWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA
SKYKWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SKYKOMISH
SMSHWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	KIRKLAND
SNHSWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH
SOLKWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SOAP LAKE
STPSWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	STEVESPASS

CLLI	ILEC/COMPANY NAME	RATE CENTER
STWDWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MARYSVILLE
SULTWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	SNOHOMISH
SUMSWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WHATCOMCTY
SWLYWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
SWLYWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	MT VERNON
THTNWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	ROSALIA
TNSKWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	TONASKET
WNTCWAXX	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	WENATCHEE
WRLDWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	RICHLAND
WSHGWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS
WSPTWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	GRAYHARBCO
WSRVWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	CAMAS
WTVLWAXA	FRONTIER COMMUNICATIONS NORTHWEST INC. - WA	DOUGLASCO
SWHDWAXX	HAT ISLAND TELEPHONE CO.	HAT ISLAND
UNINWAXB	HOOD CANAL TELEPHONE CO.	UNION
CLELWA17	INLAND TELEPHONE CO.	CLE ELUM
RSLNWAXX	INLAND TELEPHONE CO.	ROSLYN
UNTWWAXA	INLAND TELEPHONE CO.	UNIONTOWN
KALMWAXB	KALAMA TELEPHONE COMPANY	KALAMA
ETVLWAXC	MASHELL TELECOM, INC.	EATONVILLE
ONLSWAXA	MCDANIEL TELEPHONE CO.	SALKUM
SLKMWAXB	MCDANIEL TELEPHONE CO.	SALKUM
MTFLWAXX	PEND OREILLE TELEPHONE COMPANY	METALINFLS
ABRDWA01	QWEST CORPORATION	ABERDEEN
AUBNWA01	QWEST CORPORATION	AUBURN
BCKLWA01	QWEST CORPORATION	BUCKLEY
BLHMWA01	QWEST CORPORATION	WHATCOMCTY
BLHMWALU	QWEST CORPORATION	WHATCOMCTY
BLLVWAGL	QWEST CORPORATION	BELLEVUE
BLLVWASH	QWEST CORPORATION	BELLEVUE
BMTNWA01	QWEST CORPORATION	BREMERTON
BNISWA01	QWEST CORPORATION	BAINBDG IS
BTLGWA01	QWEST CORPORATION	BATTLEGRND
BYLKWA01	QWEST CORPORATION	SUMNER
CENLWA01	QWEST CORPORATION	CENTRALIA
CHHLWA01	QWEST CORPORATION	CHEHALIS
CLDMWA01	QWEST CORPORATION	COULEE DAM
CLELWA01	QWEST CORPORATION	CLE ELUM
CLFXWA01	QWEST CORPORATION	COLFAX
COLBWA01	QWEST CORPORATION	PORT ORCH
CRSBWA01	QWEST CORPORATION	BREMERTON
DESMWA01	QWEST CORPORATION	DES MOINES
DRPKWA01	QWEST CORPORATION	DEER PARK
DYTNWA01	QWEST CORPORATION	DAYTON
ELK WA01	QWEST CORPORATION	ELK-GRNBLF
ENMCWA01	QWEST CORPORATION	ENUMCLAW

CLLI	ILEC/COMPANY NAME	RATE CENTER
EPHRWA01	QWEST CORPORATION	EPHRATA
ESTNWA01	QWEST CORPORATION	CLE ELUM
FDWYWA01	QWEST CORPORATION	DES MOINES
GRBLWA01	QWEST CORPORATION	ELK-GRNBLF
ISQHWAEX	QWEST CORPORATION	ISSAQUAH
JOYCWA01	QWEST CORPORATION	PT ANGELES
KENTWA01	QWEST CORPORATION	KENT
KENTWAME	QWEST CORPORATION	KENT
KENTWAOB	QWEST CORPORATION	KENT
KENTWAOB	QWEST CORPORATION	RENTON
KENTWAOB	QWEST CORPORATION	SEATTLE
LACYWA01	QWEST CORPORATION	OLYMPIA
LBLKWA01	QWEST CORPORATION	LIBERTY LK
LGVWWA02	QWEST CORPORATION	LONGVIEW
LNLKWA01	QWEST CORPORATION	LOON LAKE
LSTNIDSH	QWEST CORPORATION	CLARKSTON
MPVYWAMV	QWEST CORPORATION	MAPLE VLY
MRISWA01	QWEST CORPORATION	SEATTLE
MSLKWA01	QWEST CORPORATION	MOSES LAKE
MSLKWAAB	QWEST CORPORATION	MOSES LAKE
NPVNWA01	QWEST CORPORATION	CHEHALIS
NWLKWA01	QWEST CORPORATION	NEWMANLAKE
OLYMWA02	QWEST CORPORATION	OLYMPIA
OLYMWAEV	QWEST CORPORATION	OLYMPIA
OMAKWA01	QWEST CORPORATION	OMAK
ORCHWA01	QWEST CORPORATION	VANCOUVER
ORVLWA01	QWEST CORPORATION	OROVILLE
OTHEWA01	QWEST CORPORATION	OTHELLO
PASCWA01	QWEST CORPORATION	PASCO
PMRYWA01	QWEST CORPORATION	POMEROY
PTANWA01	QWEST CORPORATION	PT ANGELES
PTLWWA01	QWEST CORPORATION	PORTLUDLOW
PTORWAFE	QWEST CORPORATION	PORT ORCH
PTRSWA01	QWEST CORPORATION	PATEROS
PTTWWA01	QWEST CORPORATION	PTTOWNSEND
PYLPWA01	QWEST CORPORATION	PUYALLUP
RDFDWA01	QWEST CORPORATION	RIDGEFIELD
RNTNWA01	QWEST CORPORATION	RENTON
RNTNWA01	QWEST CORPORATION	SEATTLE
ROCHWA01	QWEST CORPORATION	ROCHESTER
SEQMWA01	QWEST CORPORATION	PT ANGELES
SLDLWASI	QWEST CORPORATION	SILVERDALE
SMNRWA01	QWEST CORPORATION	SUMNER
SNYSWA01	QWEST CORPORATION	BREMERTON
SPKNWA01	QWEST CORPORATION	SPOKANE
SPKNWACH	QWEST CORPORATION	SPOKANE

CLLI	ILEC/COMPANY NAME	RATE CENTER
SPKNWAF	QWEST CORPORATION	SPOKANE
SPKNWAHD	QWEST CORPORATION	SPOKANE
SPKNWAKY	QWEST CORPORATION	SPOKANE
SPKNWAMO	QWEST CORPORATION	SPOKANE
SPKNWAWA	QWEST CORPORATION	SPOKANE
SPKNWAWH	QWEST CORPORATION	SPOKANE
STTLWA03	QWEST CORPORATION	SEATTLE
STTLWA04	QWEST CORPORATION	SEATTLE
STTLWA05	QWEST CORPORATION	SEATTLE
STTLWA06	QWEST CORPORATION	SEATTLE
STTLWACA	QWEST CORPORATION	SEATTLE
STTLWACH	QWEST CORPORATION	SEATTLE
STTLWADU	QWEST CORPORATION	SEATTLE
STTLWAE	QWEST CORPORATION	SEATTLE
STTLWALA	QWEST CORPORATION	SEATTLE
STTLWAPA	QWEST CORPORATION	SEATTLE
STTLWASU	QWEST CORPORATION	SEATTLE
STTLWAVE	QWEST CORPORATION	SEATTLE
TACMWAF	QWEST CORPORATION	TACOMA
TACMWAFL	QWEST CORPORATION	TACOMA
TACMWAGF	QWEST CORPORATION	TACOMA
TACMWAJU	QWEST CORPORATION	TACOMA
TACMWALE	QWEST CORPORATION	TACOMA
TACMWALO	QWEST CORPORATION	TACOMA
TACMWASY	QWEST CORPORATION	TACOMA
TACMWAWA	QWEST CORPORATION	TACOMAWVLY
TACMWAWV	QWEST CORPORATION	DES MOINES
TACMWAWV	QWEST CORPORATION	TACOMAWVLY
VANCWA01	QWEST CORPORATION	VANCOUVER
VANCWANO	QWEST CORPORATION	VANCOUVER
WLWLWA01	QWEST CORPORATION	WALLAWALLA
WLWLWA01	QWEST CORPORATION	TOUCHET
WTBGWA01	QWEST CORPORATION	WAITSBURG
YAKMWA02	QWEST CORPORATION	YAKIMA
YAKMWAVE	QWEST CORPORATION	YAKIMA
ORVLWA02	SKYLINE TELECOM COMPANY - WA	MT HULL
SLVTWACO	SKYLINE TELECOM COMPANY - WA	SNOHOMISH
TENNWAXA	TENINO TELEPHONE CO.	TENINO
BRNNWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HOOD CANAL
CLMAWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	COLUMBIA
CNTRWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	CHIMACMCTR
DLPTWAAC	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	DALLESPO
GLDLWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	GOLDENDALE
GRNRWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PT ANGELES
LYLEWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	LYLE
MTWAWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	MATTAWA

CLLI	ILEC/COMPANY NAME	RATE CENTER
PLSBWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	POULSBO
PRSRWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	PROSSER
QLCNWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	HOOD CANAL
RSVTWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	ROOSEVELT
SNSDWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	SUNNYSIDE
STSNWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	STEVENSON
TPNSWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TOPPENISH
WHSLWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WH SALMON
WHTSWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WHITSTRAN
WPATWAXX	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	WAPATO
WSHRWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	DALLESPOUT
ZLLHWAXA	UNITED TELEPHONE-NORTHWEST-WA DBA CENTURYLINK-WA	TOPPENISH
STHKWACO	WESTGATE COMMUNICATIONS, LLC DBA WEAATEL - WA	WENATCHEE
SWHDWAXX	WHIDBEY TELEPHONE CO.	SO WHIDBEY
YELMWAXA	YCOM NETWORKS, INC.	YELM

EXHIBIT 6

Financial Statements

PUBLIC VERSION

PUBLIC VERSION

Global Connection Inc of America - 2018 Plan

Actual

Projection

2018 vs 2017

Q4 2017

2017

2018

2019

Variance

Variance %



State of Maryland)

County of Montgomery)

Certification

I, Paul Greene, first being duly sworn, do hereby depose and state that I am the majority owner and Chief Executive Officer for both Odin Mobile, LLC ("Odin Mobile") and Prepaid Wireless Group, LLC ("PWG"), and in such capacity I am authorized to affirm the following in regard to the proposed transfer of control of Global Connection Inc. of America d/b/a StandUP Wireless ("Global Connection") to Odin Mobile:

1. Odin Mobile and its affiliates, including PWG, have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth.

Dated: 5/24/2018

Paul Greene

Paul Greene

Subscribed and sworn to before me, a Notary Public, this 24 day of May 2018.

(Notary Seal)

Marcus P. Alexander

(Signature of person authorized to administer oath)

My Commission Expires: April 3, 2020

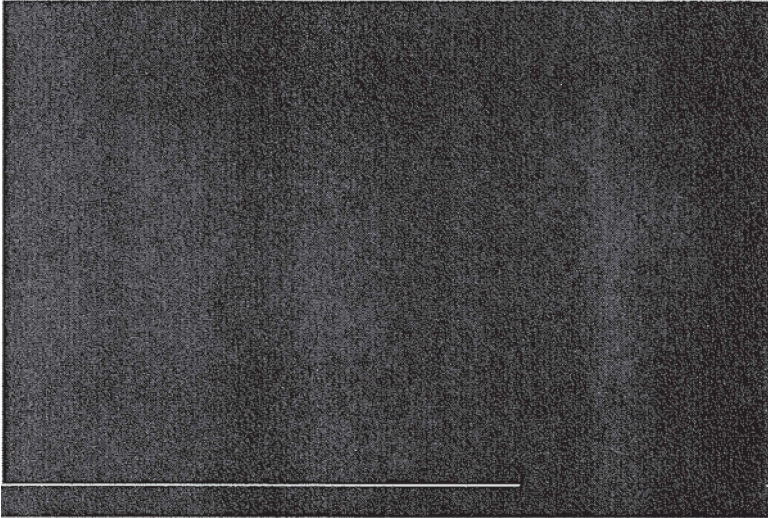


Prepaid Wireless Group
Profit & Loss
January through December 2017

Jan - Dec 17

Ordinary Income/Expense

Income



Expense



Net Income

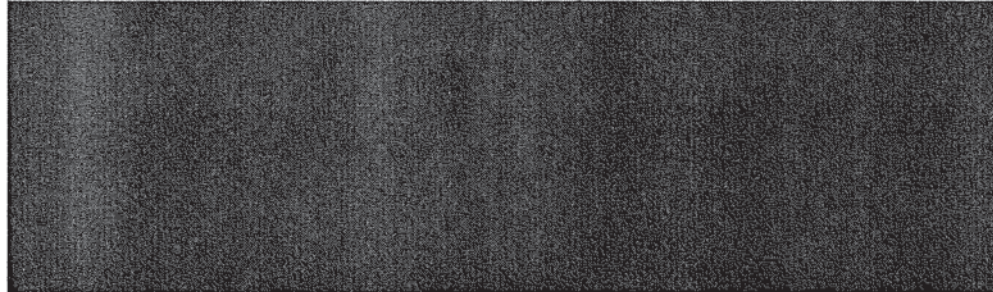
Prepaid Wireless Group
Balance Sheet
As of December 31, 2017

Dec 31, 17

ASSETS

A large rectangular area that has been completely redacted with a dark, grainy pattern, obscuring all data under the ASSETS heading.

LIABILITIES & EQUITY

A large rectangular area that has been completely redacted with a dark, grainy pattern, obscuring all data under the LIABILITIES & EQUITY heading.

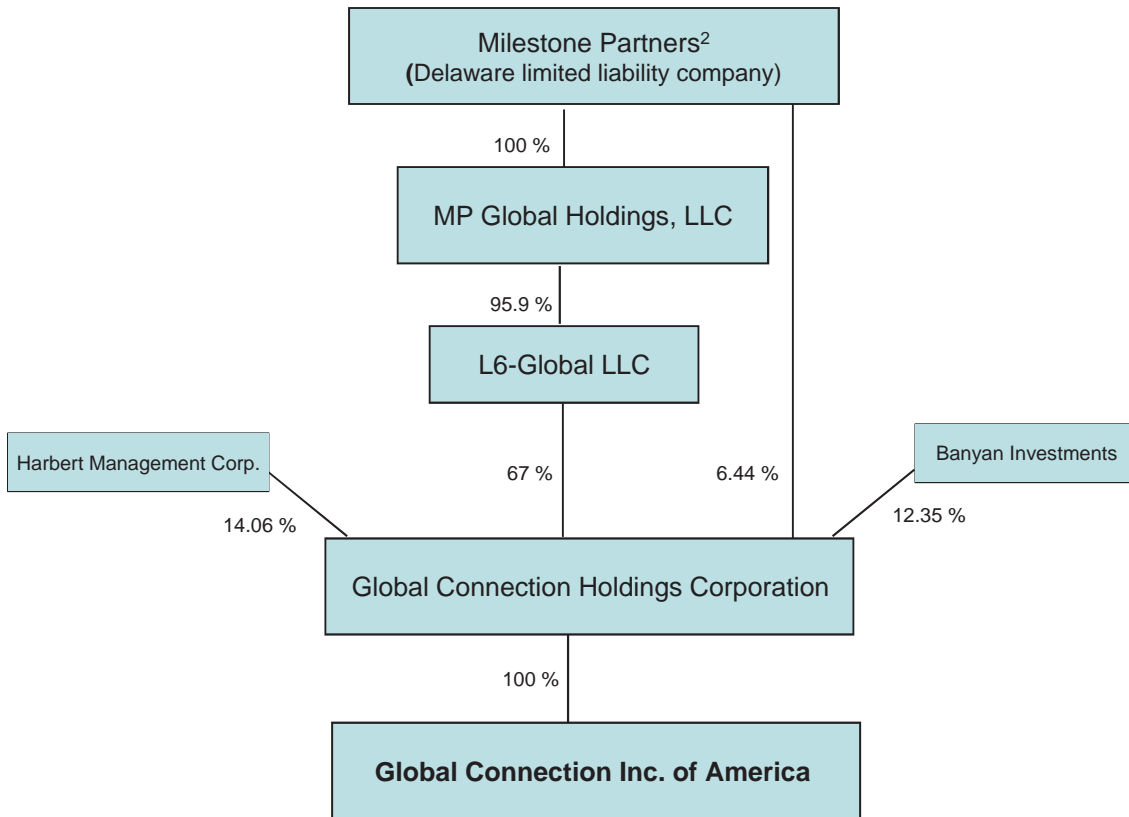
TOTAL LIABILITIES & EQUITY

A small rectangular area that has been completely redacted with a dark, grainy pattern, obscuring the total value for the bottom row of the balance sheet.

EXHIBIT 7

Corporate Structure Diagrams

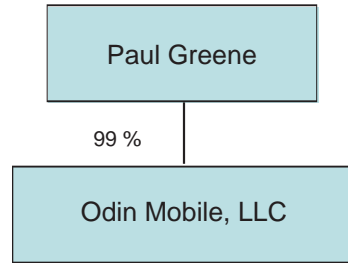
**Global Connection Inc. of America
Pre-Close Corporate Structure
(Interests \geq 10%)¹**



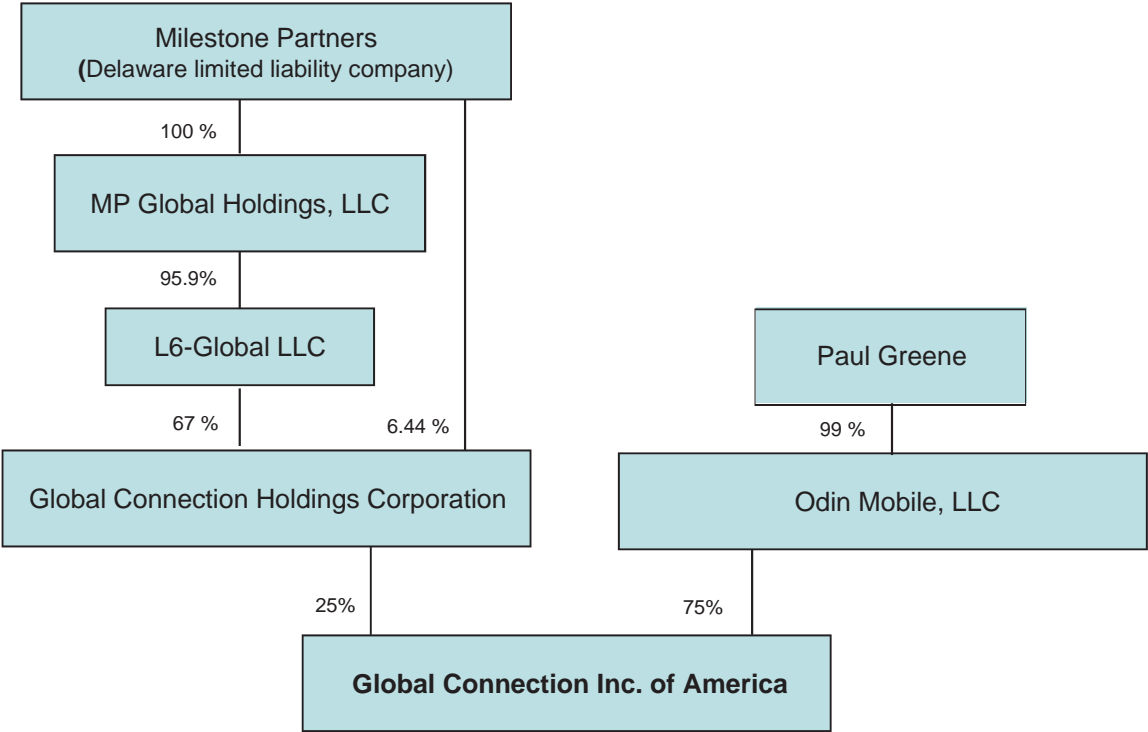
¹ Percentages shown above the level of Global Connection Holdings Corporation reflect actual interests (not adjusted for application of attribution rule) in immediate subsidiary and not indirect ownership interest in GCIOA.

² Milestone Partners holds a total indirect interest in GCIOA of 70.64% by direct calculation and 100% applying the attribution rule. These interests are held through several funds. Direct interests in MP Global Holdings, LLC are held by Milestone Partners III, L.P. (72.5%) and Milestone Partners III, L.P 2 (27.5%). The general partner of both funds is Milestone Partners III G.P., L.P. The general partner of Milestone Partners III G.P., L.P is Milestone Partners III, LLC. Voting or investment control over securities that the Milestone Partners Funds own are acted upon by vote of Milestone Partners III, LLC whose current members (all U.S. citizens) are W. Scott Warren, John P. Shoemaker, Brooke B. Hayes, and Robert G. Levine.

**Odin Mobile, LLC
Pre-Close Corporate Structure
(Interests \geq 10%)¹**



**Global Connection Inc. of America
Post-Close Corporate Structure
(Interests \geq 10%)¹**



¹ Percentages shown above the level of GCIOA reflect actual interests (not adjusted for application of attribution rule) in immediate subsidiary and not indirect ownership interest in GCIOA.