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December 1, 2016

**VIA E-FILING**

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

Re: i-wireless, LLC  
Docket No. UT-101640

Dear Mr. King:

i-wireless, LLC (“i-wireless”) hereby provides notice of improvements to its Lifeline offering effective December 2, 2016 pursuant to recent Federal Communications Commission (“FCC”) rule changes.

The changes identified herein are necessary to comply with the minimum service requirements that will take effect December 2, 2016 pursuant to the FCC’s *Third Report and Order*.<sup>1</sup> The changes, as summarized in Attachment A attached hereto, increase the amount of voice minutes and add data on i-wireless’ free non-tribal Lifeline plan, as well as introduce a new non-tribal rate plan that meets the broadband minimum service requirements. i-wireless is also increasing the amount of data on the tribal Lifeline plan. i-wireless’ devices provided to Washington Lifeline customers will meet the minimum equipment requirements set forth in 47 C.F.R. §54.408(f).

i-wireless is also increasing the amounts of voice and/or data associated with its top-up card options for purchasing additional airtime, which will result in greater benefits to the consumer. Due to the increase in benefits to i-wireless’ no-cost Lifeline rate plan and corresponding top-up options, it is no longer in the best interest of the consumer to have the option to apply their Lifeline discount to an i-wireless retail plan, and i-wireless is removing the retail discount option nationwide (no current Washington customers will be affected).

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<sup>1</sup> *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, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (“*Third Report and Order*”), Section III.B.2.

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If you have any questions or if I may provide you with additional information, please do not hesitate to contact me at 770-232-7805 or hkirby@telecomcounsel.com. Thank you.

Respectfully submitted,

*s/ Heather Kirby*

Heather Kirby  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.  
Attorneys for i-wireless, LLC

Attachment  
cc: Sam Bailey

ATTACHMENT A

I-WIRELESS, LLC'S "ACCESS WIRELESS" LIFELINE OFFERINGS  
EFFECTIVE 12/2/2016

	<b>Non-Tribal Lifeline Voice Plan</b>	<b>Non-Tribal Lifeline Broadband Plan</b>	<b>Tribal Lifeline Plan</b>
<b>National Plan Voice Minutes</b> (non-rollover)	500	Yes**	Unlimited
<b>Text</b>	Unlimited	Unlimited	Unlimited
<b>Data</b>	Yes*	500 MB	1.5 GB
<b>Additional Airtime</b>	Available with purchase of Top Up Card		

Free Handset	X	X	X
Local Calls	X	X	X
Nationwide Long Distance	X	X	X
Voicemail, Caller ID, Call Waiting	X	X	X
Free 911	X	X	X
Free 611	X	X	X
Balance Inquiries	X	X	X
Rollover Allowed	X	X	X
Text Included	X	X	X
Data Allowance	X	X	X
Participation in Kroger Free Minute Loyalty Program	X	X	X

<b>Retail Price</b>	n/a	n/a	n/a
<b>Federal Subsidy</b>	\$ 9.25	\$ 9.25	\$ 34.25
<b>Lifeline Consumer Price</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

\* The Voice Plan will include the guaranteed minimum service standard for voice minutes, and a certain amount of data which may increase periodically depending on market conditions.

\*\* The Broadband Plan will include the guaranteed minimum service standard for broadband, and a certain amount of voice minutes which may increase periodically depending on market conditions.

ATTACHMENT A

I-WIRELESS, LLC'S "ACCESS WIRELESS" LIFELINE OFFERINGS  
EFFECTIVE 12/2/2016

ACCESS WIRELESS TOP UP CARDS\*\*\*

<b>Non-Tribal</b>	<b>Purchased Minutes</b>	<b>Text (SMS/MMS)</b>	<b>Data</b>
<b>\$5 Card</b>	250	Unlimited	250 MB
<b>\$10 Card</b>	500	Unlimited	500 MB
<b>\$25 Card</b>	Unlimited	Unlimited	1 GB
<b>\$35 Card</b>	Unlimited	Unlimited	2.5 GB
<b>\$50 Card</b>	Unlimited	Unlimited	4 GB

  

<b>Tribal</b>	<b>Purchased Minutes</b>	<b>Text (SMS/MMS)</b>	<b>Data</b>
<b>\$5 Card</b>	Unlimited	Unlimited	500 MB
<b>\$10 Card</b>	Unlimited	Unlimited	1 GB
<b>\$25 Card</b>	Unlimited	Unlimited	2.5 GB
<b>\$35 Card</b>	Unlimited	Unlimited	3.5 GB
<b>\$50 Card</b>	Unlimited	Unlimited	5 GB

\*\*\* Top Up Cards valid for 30 days from date applied to account, except for the \$5 card, which is valid for 10 days from date applied.