



June 30, 2011

VIA U.S. MAIL

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

RECEIVED
PROJECTS MANAGEMENT
2011 JUL -5 AM 8:24
STATE OF WASH
UTIL. AND TRANSP
COMMISSION

Re: Petition of Cintex Wireless, LLC for Designation as an Eligible Telecommunications Carrier in the State of Washington for the Limited Purpose of Offering Wireless Lifeline and Link Up Service to Qualifying Households

Dear Mr. Danner:

Enclosed please find for filing an original and twelve (12) copies of the Petition of Cintex Wireless, LLC for Designation as an Eligible Telecommunications Carrier in the State of Washington for the Limited Purpose of Offering Wireless Lifeline and Link Up Service to Qualifying Households and for waiver of certain requirements in WAC 480-123-030.

Please acknowledge receipt of this filing by returning, date-stamped, the extra copy of this cover letter in the enclosed envelope.

Should you have any questions regarding this filing, please contact the undersigned at (703) 517-9912.

Regards,

A handwritten signature in black ink that reads "Robert Felgar".

Robert Felgar
General Counsel
Cintex Wireless, LLC

Enclosures

**Before the
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)
)
Petition of Cintex Wireless, LLC)
For Designation as an Eligible Telecommunications)
Carrier in the State of Washington for the Limited)
Purpose of Offering Lifeline and Link Up Service)
To Qualifying Households)
)

Docket No.

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

2011 JUL -5 AM 8:24

RECEIVED
PROGRAMS MANAGEMENT

**PETITION OF CINTEX WIRELESS, LLC FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER ON A WIRELESS BASIS FOR THE LIMITED PURPOSE OF OFFERING
WIRELESS LIFELINE AND LINK UP SERVICE TO
QUALIFYING HOUSEHOLDS**

Cintex Wireless, LLC (“Cintex”), by its undersigned counsel, hereby petitions the Washington Utilities and Transportation Commission (the “Commission”) for designation as an eligible telecommunications carrier (“ETC”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ and Section 54.201 *et seq.* of the rules of the Federal Communications Commission (“FCC”),² as well as Sections 480-123-030 and 480-123-040 of the Washington Administrative Code.³ Cintex seeks designation as an ETC only to participate in the Lifeline and Link Up programs. Cintex will not seek funds from the Universal Service Fund to provide service to high-cost areas.

Cintex satisfies all of the statutory and regulatory requirements for designation as an ETC. Moreover, Cintex’s petition is very similar to that of other pre-paid wireless providers,

¹ 47 U.S.C. § 214(e)(6).

² 47 C.F.R. §§ 54.201 *et seq.*

³ WAC §§ 480-123-030 and 480-123-040.

such as YourTel America, Inc. (“YourTel”) and does not raise any unique issues.⁴ Like YourTel, Cintex provides certain of the nine supported services using “a combination of its own facilities and resale of another carrier’s services.”⁵ Cintex has an agreement in place with the Sprint-Nextel Corporation (“Sprint-Nextel”) that allows it to obtain the resold services that it needs to supplement the services provided through Cintex’s owned facilities.

Since Cintex satisfies the statutory and regulatory requirements for designation as an ETC, and since this petition does not raise any new issues, Cintex respectfully requests the Commission to grant this petition as soon as possible so that Washington consumers can benefit from Cintex’s Lifeline offering as quickly as possible.

I. ABOUT CINTEX

Cintex is a Delaware limited liability company formed on January 29th, 2007. The company is in the process of qualifying to do business in Washington. Cintex currently provides commercial mobile radio services (“CMRS”) to several thousand subscribers throughout the domestic United States Sprint-Nextel wireless service territory, primarily under the “Movida” and “Liberty” brands.

As discussed above, Cintex currently obtains service from Sprint-Nextel. The agreement with Sprint-Nextel enables Cintex to offer service wherever Sprint-Nextel offers service. Cintex intends to grow significantly in the coming years by offering competitive rate plans and excellent service to its target market of low income consumers who primarily live in the inner cities.

Cintex’s marketing and distribution model is focused directly towards low-income communities and neighborhoods. Cintex will sell its phones and services through inner-city

⁴ For an Exemption from WAC 480-123-030(1)(d), (f) and (g), and Designation as an Eligible Telecommunications Carrier, Order, 2011 Wash. UTC LEXIS 436, Docket UT-110423 (June 16, 2011) (“YourTel Order”).

⁵ 47 C.F.R. § 54.201(d)(1).

retailers, grocery stores, convenient stores, hair salons, clothing stores, and the like. Most of the people in the communities in which Cintex will market its services, do not shop at “Big-Box” retail stores or on-line as they do not have access. Additionally, Cintex will provide airtime terminals at these locations for its customers to purchase additional minutes for their phone plans. Cintex’s “main street” approach and “grass-roots” sales and distribution network reaches low-income communities in the states that it serves. While Cintex will not confine its service offerings to the inner-cities, its focus on this market segment is directly relevant to its request for designation as an ETC to be able to participate in the Lifeline and Link Up programs. By providing service to this market segment, Cintex will ensure that many Americans who cannot afford or access the services provided by other wireless providers can still enjoy the benefits of wireless telecommunications.

Cintex will provide its customers prepaid services. It does not require customers to sign long-term contracts nor does it impose early termination fees. Cintex will also provide a wide choice of handsets.

II. THE COMMISSION HAS JURISDICTION TO DESIGNATE CINTEX AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), and Section 480-123-040 of the Washington Administrative Code, the Commission has the jurisdiction to designate telecommunications carriers as ETCs.⁶ The Act provides that “[a] State Commission *shall* upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier.” (emphasis added). The Washington Administrative Code provides that “[t]he Commission will approve a

⁶ 47 U.S.C. § 214(e)(2) and WAC § 480-123-040.

petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030 . . .” Further, the fact that the Commission has designated other wireless providers as ETCs, demonstrates that the Commission has the authority to do the same with respect to Cintex.

III. CİNTEX’S LIFELINE AND LINK UP OFFERING

Cintex will offer its Lifeline service through its own facilities and through the resale agreement with Sprint-Nextel or another underlying carrier. *Cintex will offer each eligible customer the following Lifeline Plans:*

Free Minutes	Text Messages	Do Unused Minutes Roll Over to the Next Month
125 Minutes	1 Text Message = 1 Minute	Yes
250 Minutes	1 Text Message = 1 Minute	No

Cintex will not charge a monthly recurring fee; the service will be strictly a pay-as-you-go service.

In the event that a customer uses all of his minutes, the customer may purchase additional airtime minutes in accordance with the following:

Airtime Card Face Value	Total Minutes	Actual Cost Per Minute
\$3.00	30	\$0.10
\$5.00	50	\$0.10
\$10.00	100	\$0.10
\$20.00	500	\$0.04

These attractive rates demonstrate that Cintex is not interested simply in collecting Lifeline funds from the Universal Service Administrative Company. We are also focused on providing customers the ability to use their phone to make a substantial number of calls at very reasonable additional cost. Accordingly, approving Cintex's petition will significantly benefit Washington's low income consumers.

Airtime cards will be available at various retail outlets frequented by low income consumers; airtime minutes may also be purchased by calling Cintex's customer service number or online.

E-911 compliant wireless handsets will be provided to qualifying Lifeline customers free of charge. The service will include caller ID, call waiting, call forwarding, 3-way calling and voicemail. As the Commission is well aware, much of competition in the wireless industry is focused around the quality of the handsets. Cintex will provide many Lifeline customers with high quality phones that offer additional features such as the ability to take pictures.

Cintex also seeks Link-Up support for its customers. Link Up support offers customers "[a] reduction in the carrier's customary charge for commencing telecommunications service for a single telecommunications connection at a consumer's principal place of residence. The reduction shall be half of the customary charge or \$30.00, whichever is less."⁷ Cintex will charge a customary charge for commencing telecommunications service of \$70.00. Cintex will recover \$30.00 of this activation fee through disbursements from USAC.

Cintex will also offer a Tribal Lifeline Plan. This Plan offers the following:

⁷ 47 C.F.R. § 54.411(a)(1).

Free Minutes	Text Messages	Do Unused Minutes Roll Over to the Next Month
2000	1 Text Message = 1 Minute	No

IV. A DESCRIPTION OF THE AREAS FOR WHICH DESIGNATION IS SOUGHT

A carrier must describe the geographic areas within which it requests designation.⁸

Cintex requests ETC designation for the wire centers listed in the Exhibit attached hereto.

Cintex will offer service throughout these wire centers to the extent of Sprint-Nextel’s coverage using a combination of its own facilities and the facilities of Sprint-Nextel.⁹

V. CINTEX WILL PROVIDE THE NINE SUPPORTED SERVICES

In order to be designated an ETC, a carrier must offer all of the services “supported by the universal service support mechanisms”¹⁰ which are enumerated in Section § 54.101(a) of the FCC’s rules. Cintex provides each of the enumerated services, other than toll limitation, which Cintex is not required to provide for reasons discussed below. Each of the supported services is discussed in turn.

1. Voice grade access to the public switched network.

Voice grade access to the public switched telecommunications network (“PSTN”) means the ability to make and receive traditional voice phone calls between the approximately 500 Hertz and 4,000 Hertz for a bandwidth of approximately 3500 Hertz.¹¹ The voice grade access

⁸ Public Notice – Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act, FCC 97-419, 12 FCC Rcd 22947 (1997).

⁹ See WAC § 480-123-030.

¹⁰ 47 U.S.C. § 214(e)(1)(A).

¹¹ See Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) (“USF Order”).

provided by Cintex enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving signals indicating there is an incoming call.

2. Local usage.

As part of the voice grade access to the PSTN, an ETC must provide local calling. Cintex provides subscribers the ability to send and receive local phone calls wherever it provides service. Moreover, local usage is in all of Cintex's calling plans, including those plans which will comprise Lifeline offerings. FCC Rule 54.202(a)(4) requires an ETC applicant to "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation."¹² The FCC has explained that an ETC applicant's local usage plans should be reviewed on a case-by-case basis to ensure that each ETC provides a local usage component in its universal service offering that is comparable to the plan offered by the incumbent LEC in the area.¹³ The FCC has not adopted any minimum local usage requirements.¹⁴ As a designated ETC, Cintex will comply with any minimum local usage requirements adopted by the FCC. Most importantly, as described in section III above, Cintex's Lifeline offerings will go beyond those of other ETCs in a very important respect. Cintex's Lifeline customers will receive as part of their Lifeline service, specified amounts of *free* wireless service. That is, Lifeline customers will be able to use Cintex's service to initiate and receive specified amounts of wireless calling – local and long distance – with no charge to the customers.

¹² 47 C.F.R. § 54.202(a)(4).

¹³ Federal-State Joint Board on Universal Service, Report and Order, 20 FCC Rcd 6371 (2005).

¹⁴ Id. ¶ 32.

3. Dual tone multi-frequency (“DTMF”) signaling or its functional equivalent.

DTMF signaling allows carriers to provide expeditious call set-up and call detail information and enables modem usage.¹⁵ The FCC permits carriers to provide signaling that is functionally equivalent to DTMF to satisfy the DTMF requirement. All telephone handsets provided by Cintex are DTMF-capable.

4. Single-party service or its functional equivalent.

Single-party service means that only one party will be served by a subscriber line or access for the duration of every phone call. Cintex does not provide “multi-party” or “party line” services.

5. Access to 911 and E911 emergency service.

The FCC has declared that access to emergency services is essential.¹⁶ Cintex provides universal access to the 911 system for its customers. Cintex offers enhanced 911 (“E-911”) services wherever such services are offered by Sprint-Nextel. In particular, Cintex will comply fully with the FCC’s E-911 requirement applicable to wireless resellers.¹⁷ Pursuant to the FCC’s E-911 Order, providers that use other carriers’ facilities to provide wireless voice service to customers have an obligation to comply with the FCC’s E-911 rules “to the extent that the

¹⁵ USF Order, 12 FCC Rcd at 8814.

¹⁶ Id. at 8815.

¹⁷ See Revision of the Commission’s Rules to Ensure Compatibility With Enhanced 911 Emergency calling Systems, Report and Order and Second Further Notice of proposed Rulemaking, 18 FCC Rcd 25340 (2003) (“E-911 Order”).

underlying facilities-based licensee has deployed the facilities necessary to deliver enhanced 911 information to the appropriate PSAP [public service answering point].”¹⁸

6. Access to operator services.

Cintex offers all of its customers access to operator services, in part through its own facilities. This is explained further in section IX below.

7. Access to interexchange service.

Cintex customers can use Cintex services to complete toll calls. In fact, Cintex does not impose separate charges for interexchange calls. Long distance calling is included in Cintex service with no additional charge.

8. Access to directory assistance.

All Cintex customers receive access to directory assistance service in part through Cintex’s own facilities. This is explained further in section VIII.

In addition, Cintex will offer its customers directory assistance at no charge. Specifically, calls to directory assistance will consume airtime, like any other call, however Cintex will not assess any additional surcharge for such calls, as is customary in the industry.

9. Toll limitation for qualified low-income customers.

There is no need for Cintex to offer a toll limitation feature to qualifying low-income customers. Since Cintex’s service is a prepaid service, no customers will be disconnected for failure to pay toll charges or, for that matter, any other charges. Inasmuch as all Cintex services

¹⁸ Id. ¶ 91.

are prepaid there is no danger that low income customers will incur large charges for heavy toll (or other) calling and no risk that they will be disconnected for nonpayment. Since customers pay for the service in advance – they can use only what they already have paid for or what service quantities have been provided to them under the Lifeline program. Thus, Cintex’s prepaid services are especially beneficial to lower income users since the consumers’ enjoy the ability to control or limit their charges for toll services (as well as local service) in a manner that customers of traditional post-paid do not.

VI. CİNTEX WILL ADVERTISE THE AVAILABILITY OF THE SUPPORTED SERVICES

Section 54.201(d)(2) of the FCC’s rules provide that an ETC must “[a]dvertise the availability of such services and the charges therefore using media of general distribution.”¹⁹ Further, a carrier offering Lifeline must “[p]ublicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.”²⁰ Similarly, a carrier must “publicize the availability of Link Up support in a manner reasonably designed to reach those likely to qualify for the support.”²¹ The Commission has similar requirements.²²

Cintex will advertise its Lifeline and Link Up offerings in traditional media such as television, radio and print. The advertisements will be placed on programming and in newspapers that target low income audiences. Cintex will also make potential customers aware of its service through direct mail. Direct mail advertising will be targeted towards low income consumers.

¹⁹ 47 CFR § 54.201(d)(2).

²⁰ 47 CFR § 54.405(b).

²¹ 47 CFR § 54.411(d).

²² WAC § 480-123-030(e).

To the extent that certain advertisements are targeted towards Hispanics, Cintex will advertise in Spanish. Cintex will also place informational material in independently-owned stores, such as convenience stores, cell phone stores and short-term loan locations.

VII. CİNTEX SATISFIES ADDITIONAL REQUIREMENTS FOR DESIGNATION AS AN ETC

In addition to providing the supported services discussed in section V above, Cintex satisfies the FCC's and the Commission's remaining requirements for designation as an ETC. These additional requirements are discussed below.

A. Cintex Will Offer Service to Requesting Customers Within a Reasonable Time

Cintex offers service through a combination of its own facilities and the facilities of Sprint-Nextel. The network is operational and Cintex will be able to activate customers "on a timely basis" as required by Section 54.202(a)(1) of the FCC's rules.²³ Moreover, Cintex will be in a position to offer its Lifeline service quickly after the Commission approves this petition.

B. Cintex Can Remain Functional in Emergency Situations

Section 54.202(a)(2) of the FCC's rules requires that a carrier seeking to be designated an ETC demonstrate that it has the ability to remain functional in emergency situations.²⁴ Cintex has the same ability to remain functional in emergency situations as Sprint-Nextel, its underlying provider.

C. Cintex will Satisfy Consumer Protection and Service Quality Standards

²³ 47 C.F.R. § 54.202(a)(1).

²⁴ 47 C.F.R. § 54.202(a)(2).

A carrier requesting designation as an ETC must “demonstrate that it will satisfy applicable consumer protection and service quality standards.”²⁵ This requirement is satisfied by a wireless applicant if it commits to “comply[ing] with the Cellular Telecommunications and Internet Association’s Consumer Code of Wireless Service.”²⁶ Cintex will comply with the Consumer Code.

D. Cintex Offers a Local Usage Plan Comparable to Those Offered by the Incumbent Local Exchange Carrier

A carrier applying for ETC status must “[d]emonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service area for which it seeks designation.”²⁷ By approving the applications to be designated an ETC of other prepaid wireless providers, which describe Lifeline offerings very similar to that of Cintex, the Commission has already implicitly concluded that Cintex’s Lifeline service offering satisfies this requirement.

E. Cintex Will Provide Equal Access

As required by FCC rule 54.202(a)(5), Cintex will “provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.”²⁸

F. Cintex Will Comply With the Lifeline and Link Up Certification and Verification Requirements of 47 C.F.R. §§ 54.410 and 54.416, as well as Section 388-273-0020 of the Washington Administrative Code

Sections 54.410 and 54.416 of the FCC’s rules require ETCs to comply with certain requirements of initial certification of eligibility and the verification of continued eligibility for

²⁵ 47 C.F.R. § 54.202(a)(3).

²⁶ Id.

²⁷ 47 C.F.R. § 54.202(a)(ii)(4).

²⁸ 47 C.F.R. § 54.202(a)(5).

participation in the Lifeline and Link Up programs.²⁹ Cintex will certify and verify customers in accordance with those rules.

Further, Cintex will use the list of public assistance programs in Section 388-273-0020 of the Washington Administrative Code (not the list in 47 C.F.R. § 54.409(b)), as well as the federal income-based eligibility criteria, to determine eligibility for Cintex’s Lifeline offer. Cintex will cooperate with the Commission and the Washington Department of Social and Health Services (DSHS) to verify whether an applicant is participating in one of the qualifying public assistance programs. This includes verifying such participation through the DSHS’ online database.

G. Cintex Will Comply with the Commission’s Reporting Requirements

The YourTel Order describes a number of reports that ETCs must provide the Commission. For example, on a quarterly basis an ETC must “provide the number of Lifeline customers that it enrolls each month.”³⁰ Cintex will provide the Commission with all reports and information described in the YourTel Order.

H. Cintex Will Comply with All other Commission Conditions

Cintex will comply with all other conditions that the Commission imposed on YourTel.

VIII. CİNTEX REQUESTS THAT THE COMMISSION WAIVE CERTAIN REQUIREMENTS

Similar to YourTel and other pre-paid wireless providers, Cintex requests that the Commission waive sections 480-123-030(1)(d), (1)(f) and (1)(g) of the Washington

²⁹ 47 C.F.R. §§ 54.410, 54.416.

³⁰ YourTel Order at *20.

Administrative Code. As the Commission recognized in the YourTel Order, these rules “are intended to apply to high cost fund recipients who have the obligation to build out and maintain network infrastructure.”³¹ Cintex seeks only low-income support. Accordingly, these rules do not apply.

IX. CİNTEX WILL PROVIDE THE SUPPORTED SERVICES OVER A COMBINATION OF ITS OWN FACILITIES AND RESALE OF ANOTHER CARRIER’S SERVICES

As required by the Act and FCC rules, Cintex will provide certain services supported by the universal service support mechanisms using a combination of its own facilities and the facilities of Sprint.³² Cintex will provide access to directory assistance and access to operator services in part over its own facilities. Thus, Cintex uses its own facilities to provide two of the supported services.

The FCC’s rules define “facilities” as “any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part.”³³ Similar to YourTel, Cintex uses its own physical components to route 411 and operator services calls. In particular, 411 and operator services calls will be sent to a Cintex-owned platform which will route the calls either to its own call center or to a vendor of its choice that will provide 411 and operator services.

The FCC has been clear that a carrier does not have to use its own facilities to provide all of the supported services in order to be designated an ETC. The FCC explained that “if a carrier uses its own facilities to provide at least one of the designated services, and the carrier otherwise

³¹ YourTel Order at *9.

³² 47 USC § 214(e)(1)(A), 47 C.F.R. § 54.201(d)(1) (an ETC must offer the supported services “using its own facilities or a combination of its own facilities and resale.”)

³³ 47 C.F.R. § 54.201(e).

meets the definition of “facilities” adopted here, then the facilities requirement of Section 214(e) is satisfied.”³⁴

Further, Section 214(e)(1)(A) of the Act makes it clear that a carrier is eligible to become an ETC if it provides the supported service(s) via a “combination” of its own facilities and resale.³⁵ Cintex is not required to provide 411 and operator services exclusively through its own facilities. Thus, by owning physical components that route 411 and operator services calls, Cintex satisfies the statutory requirement mandating that ETCs provide service “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”³⁶

X. DESIGNATING CINTEX AN ETC IS IN THE PUBLIC’S INTEREST

A. Designating Cintex an ETC Will Create Greater Competition and Choice for Washington Consumers

Cintex’s Lifeline offering will provide low income Washington consumers with increased competitive choice and the benefits of Cintex’s unique Lifeline service. As discussed in section III above, Cintex intends to offer Washington consumers a substantial number of free minutes. Moreover, Cintex will provide Washington consumers with additional minutes at a low cost. This is exemplified by its \$20.00 airtime card, which provides 500 minutes at an effective cost of \$0.04 per minute. Low income consumers will benefit significantly from Cintex’s low cost service. Further, in response to Cintex’s Lifeline offering, other carriers that provide Lifeline service will have an incentive to improve their Lifeline service offerings.

B. Cintex Will Satisfy Consumer Privacy Rules

Cintex will satisfy all federal and state laws and regulations regarding the protection of customer proprietary network information (“CPNI”) and consumer information generally. In

³⁴ USF Order, 12 FCC Rcd at 8870-71.

³⁵ 47 U.S.C. § 214(e)(1)(A).

³⁶ 47 U.S.C. § 214(e)(1).

accordance with Section 64.2009(e) of the FCC's rules, Cintex will certify annually with the FCC, its compliance with the FCC's rules addressing CPNI.³⁷

C. Cintex will Take Significant Measures to Minimize Waste and Fraud

Cintex will adopt practices and procedures designed to avoid waste and fraud. These include the following:

1. Certification and Verification.

Cintex will certify and verify consumers consistent with FCC rules 54.409 and 54.410.³⁸ Such certification will include self-certifying under the penalty of perjury that they are enrolled in one of the public assistance programs that qualify them for the discount or that they qualify under the income-based criteria.³⁹ The certification will be made prior to the activation of service. Further, each customer will be required to certify under penalty of perjury prior to service activation that he or she is only receiving a Lifeline discount from Cintex. The customer must also certify under penalty of perjury that he or she will notify Cintex if he or she is no longer eligible for Lifeline assistance. The penalty for perjury will be clearly stated on the certification form.

In addition, as stated previously, Cintex will cooperate with the Commission and DSUS' online database to verify each applicant's eligibility. This will prevent consumers from receiving subsidized telecommunications service by claiming that they participate in a government program when in fact they do not.

2. Track Customer's Primary Address.

³⁷ 47 C.F.R. § 64.2009(e).

³⁸ 47 CFR §§ 54.409 and 54.410.

³⁹ Id.

Cintex will track each Lifeline customer's primary address to ensure that Cintex does not enroll multiple persons living at the same address into the Lifeline program.

3. Non-Usage Policy

Cintex will adopt a 60-day non-usage policy for Washington consumers. Pursuant to the policy, if there is no usage on an account during any 60-day period, Cintex will notify the customer that it will no longer participate in the Lifeline program if there is no usage on the account during a subsequent 30-day grace period. During the grace period, the customer's account will remain active, and the customer will receive an allocation of free minutes.

Further, during the grace period, Cintex will engage in outreach efforts, primarily in the form of text messages, to determine if the customer wishes to remain a Lifeline customer and informing the customer that he will be withdrawn from the Lifeline program if the customer does not use the service within the grace period.

Usage during the grace period includes making or receiving a call, sending or receiving a text message, downloading data or adding money to the account. If there is usage during the grace period, the customer's lifeline service will be continued.

In the event that there is no usage during the grace period, the customer will be de-enrolled from the Lifeline program. In particular, the customer will no longer receive an allotment of free minutes; in order to use the Cintex service, the customer will have to purchase airtime just like any other customer. In addition, Cintex will no longer include the customer's number on USAC Form 497 going forward and will not seek a subsidy from the Universal Service Administrative Company for the free minutes provided during the grace period.

If the customer does not use the service at all for an additional 120 days after the end of the grace period, the customer's account will be deactivated and the customer's telephone number may be assigned to another customer.

4. Universal Service Funds will Flow Through to Customers.

One hundred percent of federal universal service funds will flow through directly to customers.

5. Cintex Advertising.

All Cintex advertising will be unambiguous, informative and consistent with applicable federal and state consumer protection statutes.

6. Live Customer Assistance.

Cintex will provide live customer service to its Lifeline customers. This will help Cintex detect service quality issues, if any, with its Lifeline offering. Cintex will not deduct any "free minutes" for 611 calls.

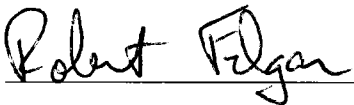
7. Complaints.

Cintex will quickly and effectively resolve complaints filed with the Commission or the FCC in connection with Cintex's Lifeline service.

XI. CONCLUSION

Based on the foregoing, Cintex has demonstrated that it is eligible to be designated an ETC. Cintex respectfully requests that the Commission grant this petition expeditiously.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert Felgar". The signature is written in a cursive style and is positioned above a horizontal line.

Robert Felgar
General Counsel
Cintex Wireless, LLC
11910 Parklawn, Suite U
Rockville, MD 20852
(301) 363-4306

Counsel for Cintex Wireless, LLC

June 30, 2011

Declaration of Cintex Wireless, LLC

I, Paul Greene, certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct:

1. I am employed as managing member of Cintex Wireless, LLC (“Cintex”) and am authorized to sign this verification on Cintex’s behalf.

2. I have read the Cintex petition and the facts contained therein are true to the best of my knowledge, and the opinions contained therein are correct to the best of my belief.

3. To the best of my knowledge, Cintex Wireless, LLC, including all officers, directors, or persons holding 5 percent or more of the outstanding stock or shares (voting or non-voting) of the Company, are not subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.


Paul Greene

Dated: June 30, 2011

EXHIBIT

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
CENTURYTEL OF COWICHE, INC.	
	COWICHE
	RIMROCK
	TIETON
CENTURYTEL OF INTER-ISLAND, INC.	
	BLAKELY ISLAND
	EAST SOUND
	FRIDAY HARBOR
	LOPEZ
CENTURYTEL OF WASHINGTON, INC.	
	AMES LAKE
	ARLETTA
	ASHFORD
	BASIN CITY
	CARNATION
	CATHLAMET
	CHENEY
	CHINOOK
	CONNELL
	COULEE CITY
	CURTIS
	EDWALL-TYLER
	ELTOPIA
	EUREKA
	FALL CITY
	FORKS
	GIG HARBOR
	HARRINGTON
	HUMPTULIPS
	KAHLOTUS
	KETTLE FALLS
	KINGSTON
	LAKEBAY
	LIND
	MATHEWS CORNER

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
	MCCLEARY
	MEDICAL LAKE
	MESA
	MONTESANO
	MORTON
	NORTH BEND
	OCEAN PARK
	OCOSTA
	ODESSA
	ORTING
	OTHELLO
	PACKWOOD
	PUGET ISLAND
	RANDLE
	REARDAN
	RITZVILLE-BENGE
	SOUTH PRAIRIE
	SPANGLE
	SPRAGUE
	TWISP
	VADER
	VASHON
	WASHTUCNA
	WILSON CREEK
FRONTIER COMMUNICATIONS NORTHWEST INC.	
	ACME-DEMING-WHATCOMCTY
	ALGER
	ANACORTES
	ARLINGTON
	BENTON CITY
	BIG LAKE
	BLAINE-BIRCH BAY-GTLD
	BOTHELL
	BURLINGTON
	CAMAS-WASHOUGAL
	CASHMERE
	CHELAN
	CONCRETE
	CONWAY
	CUSTER-GTLD

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
	DEMING-WHATCOMCTY
	EDISON
	ENTIAT
	EVERETT
	EVERSON-GTLD
	FAIRFIELD
	FERNDAL-ETLD
	GARFIELD
	GEORGE
	GRANITE FALLS
	GRAYLAND
	HALLS LAKE
	KENNEWICK
	KIRKLAND
	LA CONNER
	LATAH
	LAUREL-WHATCOMCTY
	LEAVENWORTH
	LYMAN-HAMILTON
	LYNDEN
	MANSFIELD
	MAPLE FALLS
	MARBLEMOUNT
	MARYSVILLE
	MONROE
	MOUNT VERNON
	NACHES
	NEWPORT
	NILE
	OAK HARBOR
	PALOUSE
	PULLMAN
	QUINCY
	RICHLAND
	RICHMOND BEACH
	ROCKFORD
	ROSALIA
	SEDRO WOOLLEY
	SEDRO WOOLLEY-CONTEL
	SILVER LAKE

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
	SKYKOMISH
	SNOHOMISH
	SOAP LAKE
	STANWOOD
	STEVENS PASS
	SULTAN
	SUMAS-GTLD
	TEKOA
	WATERVILLE
	WENATCHEE
	WESTPORT
QWEST CORPORATION	
	ABERDEEN-HOQUIAM
	AUBURN
	BAINBRIDGE ISLAND
	BATTLE GROUND
	BELFAIR
	BELLEVUE
	BELLINGHAM-GTLD
	BLACK DIAMOND
	BREMERTON
	BUCKLEY
	CASTLE ROCK
	CENTRALIA
	CHEHALIS
	CLE ELUM
	COLFAX
	COLVILLE
	COPALIS
	DEER PARK
	DES MOINES
	EASTON
	ELK
	ENUMCLAW
	EPHRATA
	GRAHAM
	GREEN BLUFF
	HOODSPORT
	ISSAQUAH
	KENT

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
	LIBERTY LAKE
	LONGVIEW-KELSO
	LOON LAKE
	MAPLE VALLEY
	MOSES LAKE
	NEWMAN LAKE
	OLYMPIA
	OTHELLO
	PATEROS
	PORT ANGELES
	PORT LUDLOW
	PORT ORCHARD
	PORT TOWNSEND
	PUYALLUP
	RENTON
	RIDGEFIELD
	ROCHESTER
	ROY
	SEATTLE
	SEQUIM
	SHELTON
	SILVERDALE
	SPOKANE
	SPRINGDALE
	SUMNER
	TACOMA
	TACOMA WAVERLY
	VANCOUVER
	WAITSBURG
	WARDEN
	WINLOCK
	YAKIMA
UNITED TELEPHONE - NORTHWEST	
	CHIMACUM-CENTER
	COLUMBIA
	DALLESPORT
	GOLDENDALE
	GRANDVIEW
	GRANGER
	HARRAH

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	HOOD CANAL
	LYLE
	MABTON-BICKLETON
	MATTAWA
	PATERSON
	PORT ANGELES-GARDINER
	POULSBO
	PROSSER
	ROOSEVELT
	STEVENSON
	TOPPENISH-ZILLAH
	TROUT LAKE
	WAPATO
	WHITE SALMON
	WHITE SWAN
	WHITSTRAN
	WILLARD