

WF 132070-P

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

October 29, 2013

David Danner – Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P O Box 47250
Olympia WA 98504-7250

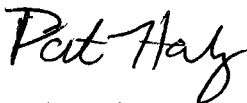
RE: Petition of Nettetalk.com Inc. for Limited Designation as a CLEC Eligible Telecommunications Carrier in the State of Washington

Mr. Danner,

Enclosed on behalf of Nettetalk.com Inc., are an original and 12 copies of the above-captioned petition for designation as an Eligible Telecommunications carrier in Washington. The individual designated to receive service on behalf of Nettetalk in connection with this petition, Mr. Patrick Hardy, is identified within this petition pursuant to WAC 480-07-150 and other applicable administrative rules.

Please date-stamp the enclosed duplicate of this filing and return in the pre-addressed envelope provided. If there are any questions regarding this filing, please let me know. Thank you for your assistance with this matter.

Thanks,



Patrick Hardy

470-253-4032

STATE OF WASHINGTON
BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

Application of Nettalk.com Inc.
For Designation as a Non-Rural
Eligible Telecommunications
Carrier

Docket No. _____

RECEIVED
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STATE OF WASH
UTIL. AND TRANSP
COMMISSION

**APPLICATION OF NETTALK.COM INC. FOR DESIGNATION AS A NON-RURAL
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Nettalk.com Inc. (“Nettalk” or the “Company”), by undersigned counsel, and pursuant to §214(e)(2) of the Communications Act of 1934, as amended (the “Act”), §54.101 through §54.207 of the rules of the Federal Communications Commission (“FCC”), and by Washington Administrative Code, WAC 480-123-030, hereby requests the Washington Utilities and Transportation Commission (“Commission”) designation as a non-rural Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving support from the federal Universal Service Fund (“USF”) to provide local exchange service under its Low-Income section for Lifeline Assistance (“Lifeline”) services. Nettalk also request designation to provide Lifeline service to the federally recognized tribal reservation areas of Washington. As demonstrated in this Application, Nettalk meets all the statutory and regulatory requirements for designation as an ETC in the State of Washington. Nettalk respectfully requests that the Commission grant this Application expeditiously so that Nettalk may begin providing Lifeline service to qualified low-income households at the earliest practicable time.

I. INTRODUCTION

Nettalk is facilities based CLEC serving the basic telephone needs of consumers. Nettalk is a Florida Corporation authorized to do business in Washington, and throughout the requested

Designated Service Area. Nettek provides its Certificate of Authority to do business in Washington as Exhibit A. Nettek provides facilities based local exchange services across the country. All correspondence, communications, pleadings, notices, orders, and decisions relating to this Petition should be addressed to:

Patrick Hardy
Telutions, LLC
3245 Peachtree Parkway Suite D
Suwanee GA 30024
Telephone 678-304-6472

II. LEGAL COMPLIANCE

A. The Commission has the Authority to Perform ETC Designations

The Commission has the requisite authority to perform the limited ETC designation requested herein. Section 214(e)(2) of the Communications Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.¹ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier ETC if the carrier satisfies the requirements of Section 214(e)(1). By offering all of the services supported by the federal USF and advertising the availability of such services, Nettek currently meets all of the applicable requirements of Section 214 of the Act, warranting its designation as an ETC by the Commission.

B. ETC Legal Requirements

Section 254(e) of the Communications Act of 1934 (the “Act”) provides that “only an eligible telecommunications carrier designated under section 214(e) of this title shall be

¹ 47 U.S.C. § 254(e).

eligible to receive specific Federal Universal Service support.” Section 214(e)(1) and (2) of the Act require state commissions to designate as an ETC, throughout the service area for which ETC status is sought, any common carrier that (i) offers services that are supported by federal universal service support mechanisms, either using its own facilities or a combination of its own facilities and resale of another carrier’s facilities, and (ii) advertises the availability of such services and the charges using media of general distribution.

1. Eligibility and Identification of the Service Area

Nettalk is a common carrier as that term is defined in the Act and, as such, is eligible for designation as an ETC. Section 214(e)(2) of the Act provides that ETC designation shall be made of a “service area” designated by the state commission. Section (214)(e)(5) of the Act provides that the “service area” shall be a “geographic area established by the State commission.” Attached hereto as Exhibit B is a list of the exchanges for which Nettalk is seeking ETC authority for its local exchange services, consisting the non-rural wire centers of CenturyLink/Qwest, Frontier, and United Telephone.

2. Supported Services

Section 214(e)(1)(A) of the Act requires that an ETC offer the services that are supported by the federal universal service support mechanisms (“Supported Services”) either using its own facilities as a combination of its own facilities and resale of another carrier’s services. Nettalk will provide each of these required

services identified in 47 C.F.R § 54.101 throughout its designated service area utilizing its own switch and the purchase of unbundled network elements.

1. Voice-grade access to the public switched telephone network – Nettalk will provide its customers with the ability to make and receive calls on the public switched telephone network.
2. Local Usage – “Local usage” means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users.”² The FCC has interpreted its rule as requiring carriers to offer customer’s rate plans with varying amounts of local usage.³ Nettalk intends to initially offer qualifying customers 800 local and domestic long distance usage, in the most basic plan at no charge to the customer. The tribal plan provides unlimited local and domestic long distance at no charge to the customer. This plan satisfies the “local usage” requirement.
3. Access to emergency services – “Access to emergency services” includes access to services, such as 911 and enhanced 911 (“E911”), provided by local governments or other public safety organizations. Nettalk will provide its customers with access to these services.

3. Advertising Support Services

Section 214(e)(1)(B) of the Act requires that an ETC advertise the availability of Supported Services and the related charges using media of general distribution. ETC’s are also required to publicize the availability of Lifeline services in a manner reasonably designated to reach those likely to qualify for such services.⁴ Nettalk will advertise the availability of the Supported Services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. Nettalk will use a

² 47 C.F.R. § 54.101(a)(2).

³ See Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Red 48, 52 II 10 (200).

⁴ 47 C.F.R. § 54.405(b) and § 54.411(d).

variety of media resources including but not limited to point of sale material of kinds, onsite merchandising, banners, customer direct mail, customer brochures, television, community events, and print media. In addition, Nettetalk agrees to comply with all form and content requirements, if any, promulgated by the FCC and this Commission in future and required of all designated ETCs.

C. Additional Eligibility Criteria

The FCC, in its March 17, 2005 Report and Order establishing additional criteria that all ETC applicants must satisfy in order to be designated as an ETC, which include: (1) a commitment and ability to provide the Supported Services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) commitment to satisfy consumer protection and service quality standards; (4) offering local usage comparable to that offered by the incumbent LEC; and (5) an acknowledgement that it may be required by the FCC to provide equal access if all other ETCs in the designated service area relinquish their designation pursuant to Section 214(e)(4) of the Act.⁵

1. Commitment and Ability to Provide the Supported Services

The requires an ETC to demonstrate its commitment to provide the Supported Services throughout the designated service area by: (A) committing to provide service throughout it designated service area to customers who make a reasonable request for service; and (B) submitting a five-year plan

⁵ See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 20 FCC RCD 6371 (2005) ("ETC Order"), at 6386-87.

demonstrating how high cost universal service support will be used to improve its coverage, service quality and capacity.

a. Commitment to Serve all Customers Making a Reasonable Request for Service

Nettalk commits to serve all customers that make a reasonable request for service in its designated service area.

b. Five Year Service Improvement Plan

The FCC required the filing of a Five Year Service Improvement Plan in 47 C.F.R. § 202. However, the requirement appears to be intended to demonstrate the use of high-cost funds and as such is not applicable to Nettalk's request for low-income support from the FUSF.

2. Ability to Remain Functional in Emergency Situations

Since Nettalk is provided service to its customer through the use of its own redundant facilities, Nettalk will provide customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes, resulting from emergency situations.

3. Consumer Protection and Commitment to Provide Quality Service

If designated as an ETC, Nettalk will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(2), as well as all applicable state specific consumer protection and service quality standards

and will commit that all universal service fund support received by Nettetalk will be directly reflected in the price that the eligible customer pays. In addition, Nettetalk will certify compliance with the protection of Customer Proprietary Network Information (“CPNI”) as required by federal law.

4. Local Usage

An ETC is required 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.”⁶ The FCC has explained that the local usage plans of an ETC applicant should be reviewed on a case-by-case basis⁷ in order to ensure that each ETC applicant is providing local usage component as a part of its universal service offering that meets the FCC requirements. Nettetalk will offer its customer 800 local and domestic long distance minutes in its basic “free” lifeline plan. This local usage plan satisfies the “comparable local usage” requirement.

D. Public Interest

Designation of Nettetalk as an ETC is in the public interest of the State of Washington and its low-income telecommunications end-users. Under the 1996 Act, “upon request and consistent with the public interest, convenience and necessity” the Commission shall “designate more than one common carrier as an eligible telecommunications carrier for a service area designated” by the Commission. In doing so, the Commission shall find that

⁶ See *Lifeline Reform Order*, ¶ 49

⁷ See ETC Order at 6385, 41133

the designation is in the public interest.” The FCC Rules require that an ETC application demonstrate that designation would be consistent with the public interest, convenience and necessity and that prior to designating an ETC pursuant to section 214(e)(6), the Commission shall consider the benefits of increased consumer choice, and the unique advantages...of the applicant’s service offering”.⁸ Pursuant to this requirement, Nettetalk provides the following information which clearly demonstrates that Nettetalk’s designation as an ETC is consistent with the public interest, convenience and necessity providing consumers with increased competitive choice through the offering of a unique service.

The FCC has also identified factors that are to be considered in determining whether designation of additional ETCs will serve the public interest such as whether the benefits of an additional ETC would outweigh potential harms. These factors include: 1) the benefits of increased competitive choice; and 2) the unique advantages and disadvantages of the company’s service offerings. Nettetalk affirms that its ETC designation meets these criteria as described below.

E. Increased Competitive Choice.

Nettetalk’s service is of particular interest to credit-challenged customers-many of whom are low income, who generally cannot obtain service from the incumbent carrier; the granting of ETC status is clearly in the public interest. Access to Lifeline can be critically important to a significant portion of the eligible low income customers. To Nettetalk’s knowledge, Lifeline services are not be sufficiently advertised and made available to eligible low income consumers in the Designated Service Area. As of the end of 2011, Washington had a Lifeline penetration rate of no more than 50%, many of

⁸ ETC Order at 7 40

which are being services by prepaid wireless carriers that only offer their customer 250 minutes of use. Nettetalk's basic "free" offering provides is customers with a generous 800 minutes of local and domestic long distance calling and 250 text messages. The tribal offering provides unlimited local and domestic long distance calling and text messaging at no charge to the customer.

F. Nettetalk's Lifeline Plan.

The services offered to customer are on a monthly basis. These services are provided to the customer without requiring a security deposit or gaining credit worthiness. Customer have the opportunity to choose products based on current needs and change products on a monthly basis without incurring costly fees. Nettetalk's offerings provide long distance calling, which eliminates the billing of additional monthly fees. The Lifeline discount can be applied to any of Nettetalk's calling plans listed in Exhibit C.

I. Designation of Nettetalk Will Impose a Negligible Burden on the USF.

Nettalk reiterates that it is applying for ETC designation solely for the purpose of providing Lifeline discounts to qualified low-income consumers and to seek reimbursement for the same and will not seek or accept High Cost support. Under the FCC Rules, an ETC applicant must submit a five-year plan that describes with specificity the proposed improvements or upgrades to the applicant's network on a wire-center-by-wire-center basis throughout its proposed Service Area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because Nettetalk seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline services to eligible customers, submission of

a Five-Year Network Improvement Plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunication services for eligible consumers, is distributed on a per-customer basis, and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low-income users, which is clearly in the public interest. In addition, designation of the Company as an ETC will not pose any adverse effect in the growth in the high cost portions of the USF, nor will it create or contribute to an erosion of high cost funding from any rural or non-rural telephone company.

The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the fund when it stated that “any increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible participation in the Lifeline programs, furthering the statutory goal of providing access to low-income consumers.”⁹

It is also vital to recognize that in the case of Lifeline support, an ETC receives USF support *only* for the customers it obtains. In the scenario where a competitive ETC obtains a Lifeline customer from another ETC, only the “capturing” ETC provides a Lifeline discount and as a result, only the “capturing” ETC receives support reimbursement.

In addition, all providers are required to contribute a portion of the interstate revenues received from their customers to the Universal Service Fund. In accordance with current federal regulations, Nettetalk will make contributions based on that portion of its revenue that is

⁹ TracFone Forbearance Order, at ¶ 1

determined to be interstate. As such, approving Nettetalk as an ETC will actually create contributions to the USF that were previously non-existent.

J. Nettetalk Has Internal Controls in Place to Prevent Subscribers from Receiving More Than One Lifeline Discount.

Consistent with federal requirements, Nettetalk will comply with the uniform eligibility criteria established in new Section 54.409 of the FCC's rules.¹⁰ 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 household of that size; (2) the household's participation in one of the federal assistance programs listed in the rule;¹¹ or (3) meeting eligibility criteria established by the State for its residents, "provided such criteria are based solely on income or factors directly related to income."¹² In addition, 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.

Nettalk has 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.¹³ Consistent with federal requirements, Nettetalk requires customers to certify at the time of service activation and annually thereafter that they: 1) are the head of household; 2) participate in one of the state-approved

¹⁰ 47 C.F.R. § 54.409 (effective June 1, 2012).

¹¹ "The consumer, one or more of the consumer's dependents, or the consumer's household must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program; Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program's free lunch program; or Temporary Assistance for Needy Families." 47 C.F.R. § 54.409(A)(2).

¹² 47 C.F.R. § 54.409(A)(3).

¹³ Lifeline Reform Order at ¶61; 47 C.F.R. § 54.410(a).

means tested programs; 3) will be receiving Lifeline-supported services only from Nettetalk; 4) do not currently receive Lifeline support; and 5) will notify Nettetalk in the event that they no longer participate in the qualifying program.

If Nettetalk 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.¹⁴ A demonstration of eligibility must comply with the annual verification procedures found in Section 54.410(f), including the submission of a certification form.¹⁵ In addition, the FCC has promulgated specific standards and procedures for the de-enrollment of subscribers for reasons of duplicative support, non-usage and failure to re-certify.¹⁶ Nettetalk will implement these de-enrollment requirements.

Verification of continued eligibility is accomplished on a yearly basis in accordance with state-specific procedures.

K. Waivers Requested

Nettalk requests the Commission exempt it from the ETC petition requirements set forth in WAC 480-123-030(d), which states that an ETC petitioner must provide a substantive plan of the investments to be made with the initial federal support and description of how those expenditures will benefit customers. This requirement applies to carriers that seek high-cost support to fund investments to their networks. Nettetalk seeks designation as an ETC so it can provide only low

¹⁴ Lifeline Reform Order at ¶ 143; 47 C.F.R. § 54.405(e)(1).

¹⁵ 47 C.F.R. §54.410 (effective April 2, 2012).

¹⁶ 47 C.F.R. s 54.405(e)(2) through (e)(4).

income support Lifeline services. The company will pass the Lifeline credits on to Lifeline customers. Nettetalk has no basis for filing an investment plan, and should be exempt from this requirement.

CONCLUSION

Nettalk respectfully requests designation as an ETC for the Designated Service Area for purposes of receiving federal Lifeline universal service support.

Dated this 29th day of October, 2013.

Respectfully Submitted,

Nettalk.com, Inc.

By: Pat Harty

EXHIBIT A

UNITED STATES OF AMERICA

The State of



Washington

Secretary of State

I, KIM WYMAN, Secretary of State of the State of Washington and custodian of its seal,
hereby issue this

CERTIFICATE OF EXISTENCE/AUTHORIZATION

OF

NET TALK.COM, INC.

I FURTHER CERTIFY that the records on file in this office show that the above named Profit Corporation was formed under the laws of the State of FL and was issued a Certificate Of Authority in Washington on 11/18/2008.

I FURTHER CERTIFY that as of the date of this certificate, NET TALK.COM, INC. remains active and has complied with the filing requirements of this office.

Date: October 30, 2013

UBI: 602-870-171



Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital

Kim Wyman

Kim Wyman, Secretary of State

EXHIBIT B

Areas for Eligible Telecommunications Carrier Designation

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
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

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	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
	FERNDALE-GTLD
	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
CenturyLink	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

INCUMBENT LOCAL EXCHANGE CARRIER	EXCHANGE
	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

EXHIBIT C

netLifeline Lifeline Offerings

netLifeline Offerings:

Plan Description Retail Price

Active User unlimited Talk & Text*

Non Lifeline \$34.25
Lifeline \$25.00
Reservation Lifeline Free

1000 Minute Talk and 250 Text messages

Non Lifeline \$9.25
Lifeline Free

All plans include, at no extra charge: Free Handset and/or other interfacing devices; Caller ID; Call Waiting; and Voicemail. Voicemail calls count against the voice minutes provided by the plan.

Prices for the Active User Talk & Text Plan, the 250 Minute Talk (non-Lifeline), and the purchase of additional minutes or the additional text messages do not include taxes or mandatory government fees (where applicable). Although Budget PrePay must pay taxes or government fees in certain states, these taxes or government fees are not assessed to Lifeline customers subscribing to the 1000 minute talk/250 text message Talk plan.

*The Active User Talk & Text Plan provides for a combined 4000 voice minutes and text messages. Each text message counts as one minute of voice service.

Plan Additions Retail Price*

Additional Minutes for 250 Minute Talk

50 minutes 5.00
100 minutes \$10.00
150 minutes \$15.00

Additional 500 Text Message Add-on for 1000 Minute Talk \$5.00**

* Applicable taxes and government fees are assessed to the above Plan Additions.

**The Text Message Add-on provides 500 text messages.

Lifeline Credits

Federal Lifeline Credit \$9.25

Indian Reservation Additional Credit \$25.00

Service Period for all plans: All airtime (airtime associated with a particular plan, if any, as well as additional purchased minutes, text messages or other services), expires at the end of each 30-day cycle whether subscriber uses the airtime or not. No airtime (whether associated with a particular plan or purchased separately), if any is carried over to the next 30-day period.