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UT-240072

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May 16, 2024

VIA ELECTRONIC DELIVERY

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: IM Telecom, LLC d/b/a Infiniti Mobile Initial Compliance Filing
Docket No. UT-240072

Dear Mr. Killip:

IM Telecom, LLC d/b/a Infiniti Mobile hereby submits information in compliance with Appendix A (No. 1) of Order 01 issued in the above-referenced docket which granted INFINITI designation as an Eligible Telecommunications Carrier. Please find the following attachments:

Exhibit A: Information on Lifeline rates, terms and conditions

Exhibit B: Proposed Lifeline advertising language and sample advertisement

Exhibit C: Lifeline Customer Application Form

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-9200 or info@telecomcounsel.com. Thank you.

Respectfully submitted,

/s/ Lance Steinhart

Lance Steinhart, Esq.
Managing Attorney
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Attorneys for IM Telecom, LLC d/b/a Infiniti Mobile

Attachments

EXHIBIT A

Lifeline Rates, Terms and Conditions

Infiniti Mobile	Plan 1	Plan 2	Plan 3 (Tribal only)
Data	1 GB	4.5 GB	6 GB
Voice Minutes	1,000	3,000	3,000
Text (SMS)	1,000	Unlimited	Unlimited
Retail Rate	\$20.00/month	\$30.00/month	\$35.00/month
Lifeline Subsidy	-\$5.25	-\$9.25	-\$34.25
Company Discount	-\$0.75	-\$0.75	-\$0.75
Net Cost to Lifeline Subscribers	\$14.00/month	\$20.00/month	\$0.00/month (Tribal)

Customers select a rate plan at enrollment and may contact customer service to change plans at any time.

Top Ups

- \$10.00 for 1,000 minutes and 1,000 texts
- \$10.00 for 1GB Refill
- \$20.00 for 2GB Refill
- \$30.00 for 4GB Refill

All plans include:

- Free phone or SIM card
- Calls to 911 emergency services
- Calls to Customer Service
- Access to Voicemail, Caller-ID, Call-Waiting, Call-Forwarding, and 3-Way Calling features
- Domestic, Long-Distance Calls

Complete program terms of use located at <https://infinitimobile.com/terms/>

**The following language has been added to the Terms section 14:*

Unresolved questions or complaints regarding Lifeline service may be directed to the Washington State Office of Attorney General, Consumer Protection Division at 1-800-551-4636.

EXHIBIT B

Proposed Advertising

See attached sample advertisement

See also <https://infinitemobile.com/lifeline-eligibility/> and
<https://infinitemobile.com/lifeline-plans-transition/>

FREE Phone

with TALK, TEXT, and DATA as low as \$14 per month*



To See If You Qualify
And To Sign Up
Is One Click Away!

www.infinitimobile.com

Lifeline Product Plans	Essentials (Non-Tribal)	Enhanced (Non-Tribal)	Enhanced Plus (Tribal)
Data	1 GB	4.5 GB	6 GB
Voice Minutes	1,000	3,000	3,000
Text	1,000	Unlimited	Unlimited
Monthly Cost to Subscribers	\$14.00/month	\$20.00/month	\$0.00/month

Under the FCC's Lifeline program, eligible subscribers receive a subsidized monthly benefit for wireless phone services. One benefit per household. Benefits are nontransferable.

*Plans and pricing based on program eligibility and can vary by program and state. Rules and restrictions apply.

Unresolved questions or complaints regarding Lifeline service may be directed to the Washington State Office of Attorney General, Consumer Protection Division at 1-800-551-4636.

For more information, please go to <https://infinitimobile.com/> or call 888 801 0012.



EXHIBIT C

Lifeline Customer Application Form

Service providers are required to use FCC Forms 5629 (application & certification form), 5630 (annual recertification form), and 5631 (one-per-household worksheet) to confirm subscriber eligibility for the federal Lifeline program. Service providers in National Verifier states should use the National Verifier versions of the forms, which show the Lifeline Support Center's address on the cover page.

<https://www.usac.org/lifeline/rules-and-requirements/forms/>

The attached forms, as well as recertification forms and Spanish versions of all forms, are also available at <https://www.lifelinesupport.org/national-verifier/>

Lifeline Program Application Form



Universal Service
Administrative Co.

1. About Lifeline

Lifeline is a Federal Communications Commission (FCC) program that provides a monthly phone or internet service discount for qualifying low-income consumers.

Rules

If you qualify, your household can receive a monthly Lifeline benefit of up to \$9.25 to lower the costs of phone or internet service and up to \$34.25 for qualifying households on Tribal lands.

- **If you get Lifeline for phone service**, you can get the benefit for one mobile phone or one home phone, but not both.
- **If you get Lifeline for internet service**, you can get the benefit for your mobile phone or your home connection, but not both.
- **If you get Lifeline for bundled phone and internet service**, you can get the benefit for your mobile phone bundled service or your home bundled service, but not both.

Your household cannot get Lifeline from more than one phone or internet company. You are only allowed to get one Lifeline benefit per household, **not per person**.

What is a household?

A household is a group of people who live together and share income and expenses (even if they are not related to each other). Complete the Lifeline household worksheet to determine if more than one qualifying household is located at your address. If more than one person in your household participates in Lifeline, you are breaking the FCC's rules and will lose your benefit.

Do not give your benefit to another person

Lifeline is non-transferable. You cannot give your Lifeline benefit to another person, even if they qualify.

Be honest on this form

You must give accurate and true information on this form and on all Lifeline-related forms or questionnaires. If you give false or fraudulent information, you will lose your Lifeline benefit (i.e., de-enrollment or being barred from the program) and the United States government can take legal actions against you. This may include (but is not limited to) fines or imprisonment.

You may need to show other documents

If the Lifeline Program Administrator is not able to validate that you or someone in your household qualify by checking available electronic resources (including eligibility databases for the FCC's government agency partners), you may need to provide additional documents. For example, you may need to provide an official document that proves your participation in a qualifying government assistance program, your income, or your identity. Please include copies of your proof documentation when you submit your application to speed up processing time.

Apply

To apply for a Lifeline benefit, fill out the required sections of this form, initial every agreement statement, and sign on page 6. You can also apply online at LifelineSupport.org for fastest processing.

Mail the form to this address:

USAC
Lifeline Support Center
P.O. Box 9100
Wilkes-Barre, PA 18773

Lifeline Program Application Form



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2a. Your Information

All fields are required unless indicated. Use only CAPITALIZED LETTERS and black ink to fill out this form.

What is your full legal name?
The name you use on official documents, like your Social Security Card or State ID. Not a nickname.

First

Middle (optional) Suffix (optional)

Last

What is your phone number (if you have one)? **What is your date of birth?**

Month Day Year

What is your email address (if you have one)?

What are the last 4 numbers of your Social Security Number (SSN)?
If you do not have a SSN, what is your Tribal Identification Number?

What is the best way to reach you?

email phone* text message* mail

*If I selected the phone or text option, I consent to let USAC contact me at my Lifeline phone number for important reminders and updates to my Lifeline service.

If I selected the text message option, message and data rates may apply.

Text STOP to end messages.

Lifeline Program Application Form



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2b. Your Information (continued)

*Tribal lands include any federally recognized Indian tribe's reservation, pueblo, or colony, including former reservations in Oklahoma; Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688); Indian allotments; Hawaiian Home Lands—areas held in trust for Native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920 July 9, 1921, 42 Stat. 108, et. seq., as amended; and any land designated as such by the FCC for purposes of this subpart pursuant to the designation process in the FCC's Lifeline rules.

A map of qualifying Tribal lands is available on USAC's website:
https://www.lifelinesupport.org/wp-content/uploads/documents/get-lifeline/fcc_tribal_lands_map.pdf

What is your home address? (The address where you will get service. Do not use a P.O. Box)

Street Number and Name

Apt., Unit, etc. City

State Zip Code

Is this a temporary address? Yes No **Check if you live on Tribal lands***

What is your mailing address? (Only fill this out if it is not the same as your home address.)

Street Number and Name

Apt., Unit, etc. City

State Zip Code

Lifeline Program Application Form



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2c. Your Information (continued)

Only fill this section out if you are applying through a child or dependent.

Check if you are qualifying through a child or dependent in your household.
If so, answer the following questions:

What is their full legal name?

First

Middle (optional)

Suffix (optional)

Last

What is their date of birth?

Month

Day

Year

What are the last 4 numbers of their Social Security Number (SSN)?

If they do not have a SSN, what is their Tribal Identification Number?

Lifeline Program Application Form



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3. Qualify for Lifeline

Fill out this section to show that you, your dependent, or someone in your household qualifies for Lifeline.

You can qualify through certain government assistance programs or through your income (you do not need to qualify through both).

When you mail this form, **please include documents that show you participate in one of the programs you selected or that you qualify through your income.** A list of acceptable documents is available at LifelineSupport.org

Qualify through a government program:

Check all programs that you or someone in your household have:

- Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)
- Supplemental Security Income (SSI)
- Medicaid
- Federal Public Housing Assistance (FPHA)
- Veterans Pension or Survivors Benefit Programs

Tribal Specific Programs

- Bureau of Indian Affairs (BIA) General Assistance
- Tribal Temporary Assistance for Needy Families (Tribal TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Tribal Head Start (only households that meet the income qualifying standard)

Or

Qualify through your income:

(Only fill this out if you do not qualify through a government program.)

Including you, how many people live in your household? (check one)	Is your income the same or less than the amount listed for your state and household size? <small>(only check yes or no next to your household size)</small>				
	All 48 States, DC, and Territories <small>(not Alaska and Hawaii)</small>	Alaska	Hawaii	Yes	No
1	\$20,331	\$25,394	\$23,369	Yes	No
2	\$27,594	\$34,479	\$31,725	Yes	No
3	\$34,857	\$43,565	\$40,082	Yes	No
4	\$42,120	\$52,650	\$48,438	Yes	No
5	\$49,383	\$61,736	\$56,795	Yes	No
6	\$56,646	\$70,821	\$65,151	Yes	No
7	\$63,909	\$79,907	\$73,508	Yes	No
8	\$71,172	\$88,992	\$81,864	Yes	No
<small>If more than 8, add this amount for each extra person:</small>	<small>Add \$7,263</small>	<small>Add \$9,086</small>	<small>Add \$8,357</small>	Yes	No

135% of the 2024 Federal Poverty Guidelines
*The Federal Poverty Guidelines are typically updated at the end of January.

Lifeline Program Application Form



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4. Agreement

I agree, under penalty of perjury, to the following statements:

You must initial next to each statement. If you fail to initial each statement, your application will be considered incomplete.

By providing a phone number, you consent to letting USAC contact you at that phone number via artificial or prerecorded voice message or text for important reminders and updates about your Lifeline benefit. For text messages, message and data rates may apply. Text STOP to end messages.

I (or my dependent or other person in my household) currently get benefits from the government program(s) listed on this form or my annual household income is 135% or less than the Federal Poverty Guidelines (the amount listed in the Federal Poverty Guidelines table on this form).
Initial

I agree that if I move I will give my service provider my new address within 30 days.
Initial

I understand that I have to tell my service provider within 30 days if I do not qualify for Lifeline anymore, including:

- 1) I, or the person in my household that qualifies, do not qualify through a government program or income anymore.
- 2) Either I or someone in my household gets more than one Lifeline benefit (including more than one Lifeline broadband internet service, more than one Lifeline telephone service, or both Lifeline telephone and Lifeline broadband internet services).

I know that my household can only get one Lifeline benefit and, to the best of my knowledge, my household is not getting more than one Lifeline benefit.
Initial

I agree that all of the information I provide on this form may be collected, used, shared, and retained for the purposes of applying for and/or receiving the Lifeline Program benefit. I understand that if this information is not provided to the Lifeline Program Administrator, I will not be able to get Lifeline benefits. If the laws of my state or Tribal government require it, I agree that the state or Tribal government may share information about my benefits for a qualifying program with the Lifeline Program Administrator. The information shared by the state or Tribal government will be used only to help find out if I can get a Lifeline Program benefit.
Initial

All the answers and agreements that I provided on this form are true and correct to the best of my knowledge.
Initial

I know that willingly giving false or fraudulent information to get Lifeline Program benefits is punishable by law and can result in fines, jail time, de-enrollment, or being barred from the program.
Initial

My service provider may have to check whether I still qualify at any time. If I need to recertify (renew) my Lifeline benefit, I understand that I have to respond by the deadline or I will be removed from the Lifeline Program and my Lifeline benefit will stop.
Initial

The certification below applies to all consumers and is required to process your application.

I was truthful about whether or not I am a resident of Tribal lands, as defined in section 2 of this form.
Initial

Signature	Today's Date
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Lifeline Program Application Form



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5. Agent Information

Representatives who help consumers apply (such as phone or internet company agents, state and Tribal partners, etc.) are required to register in the Representative Accountability Database (RAD) and must enter their information in this section.

What is the agent's full legal name?
The name you use on official documents, like your Social Security Card or State ID. Not a nickname.

First

Middle (optional) Suffix (optional)

Last

What is the agent's Representative ID number? **What is the agent's date of birth?**

Month Day Year

Lifeline Program Application Form



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Notice

PAPERWORK REDUCTION ACT NOTICE: Section 54.410 of the Federal Communications Commission's rules requires all Lifeline subscribers to demonstrate their eligibility to receive Lifeline services. This collection of information stems from the FCC's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. §254. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.). The data provided in response to this information collection will be used by USAC to verify the applicant's eligibility for Lifeline services.

We have estimated that each response to this collection of information will take, on average, between 0.25 and 0.75 hours. Our estimate includes the time to read the questions, look through existing records, gather the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, OMD-PERM, Paperwork Reduction Project (3060-0819), Washington, D.C. 20554. We also will accept your comments via the Internet if you send them to PRA@fcc.gov. Please DO NOT SEND COMPLETED DATA COLLECTION FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid Office of Management and Budget (OMB) control number. This collection has been assigned an OMB control number of 3060-0819.

The Commission is authorized under the Communications Act of 1934, as amended, to collect the information we request on this form. If we believe there may be a violation or potential violation of a statute or a Commission regulation, rule, or order, your response may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order. In certain cases, the information in your form may be disclosed to the Department of Justice, court, or other adjudicative body when (a) the Commission; (b) any employee of the Commission; or (c) the United States government, is a party to a proceeding before the body or has an interest in the proceeding.

If you do not provide the information we request on this form, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, P.L. No. 104-13, 44 U.S.C. § 3501, et seq.

PRIVACY ACT STATEMENT: The Privacy Act is a law that requires the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) to explain why we are asking individuals for personal information and what we are going to do with this information after we collect it.

Authority: Section 254 of the Communications Act (47 U.S.C. § 254), as amended, 47 U.S.C. §254, authorizes the FCC to operate the Lifeline program. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.).

Purpose: We are collecting this personal information so we can verify that you qualify for the Lifeline Program and so we can efficiently provide Lifeline services to you. We access, maintain and use your personal information in the manner described in the Lifeline System of Records Notice (SORN), FCC/WCB-1, is available at <https://www.fcc.gov/managing-director/privacytransparency/privacy-act-information#systems/>.

Routine Uses: We may share the personal information you enter into this form with other parties for specific purposes, such as: with contractors that help us operate the Lifeline program; with other federal and state government agencies that help us determine your Lifeline eligibility; with the telecommunications companies that provide you Lifeline service; and with law enforcement and other officials investigating potential violations of Lifeline rules.

A complete listing of the ways we may use your information is published in the Lifeline SORN described in the "Purpose" paragraph of this statement.

Disclosure: You are not required to provide the information we are requesting, but if you do not, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.