

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKET UT-110423
)	
YOURTEL AMERICA, INC.,)	ORDER 01
)	
)	ORDER GRANTING THE
)	EXEMPTION FROM PROVISIONS
For an Exemption from WAC 480-123-030(1)(d), (f) and (g), and Designation as an Eligible Telecommunications Carrier)	OF WAC 480-123-030(1)(d), (f) and (g), AND DESIGNATION AS AN
)	ELIGIBLE
)	TELECOMMUNICATIONS
)	CARRIER
.....)	

INTRODUCTION AND BACKGROUND

- 1 On March 2, 2011, YourTel America, Inc. (YourTel or Company) filed a petition with the Washington Utilities and Transportation Commission (UTC or Commission) requesting designation as an Eligible Telecommunications Carrier (ETC) pursuant to Section 214 (e)(2) of the Communications Act of 1934, as amended (the Act), and Washington Administrative Code (WAC) 480-123-030. YourTel seeks ETC designation in Washington for the purpose of receiving the federal Lifeline and Link Up support. Lifeline and Link Up support are parts of the federal Universal Service Fund (USF). They subsidize qualified low-income households’ monthly charges for basic telephone services and the non-recurring connection charges, respectively. YourTel seeks ETC designation for exchanges listed in Appendix A . YourTel does not seek to participate in the state Lifeline program, Washington Telephone Assistance Program (WTAP).
- 2 YourTel filed four amendments to its original petition on April 19, 2011, April 27, 2011, May 16, 2011 and May 20, 2011, respectively. The first and third amendments describe the additional Lifeline plan for qualified residents in tribal areas. The second amendment affirms that YourTel will provide nationwide access to 911 service for all of its customers. In the fourth amendment, YourTel provided additional commitment to E911 provision and customer verification procedures.
- 3 The Commission has jurisdiction over ETC petitions. Section 214 (e) of the Act authorizes state regulatory commissions to designate a qualified common carrier as an ETC for the purpose of receiving federal Universal Service Fund.¹ By rule, WAC 480-123-040, the Commission has the authority to approve petitions from carriers requesting

¹ 47 U.S.C. § 214(e)(2). See also 47 C.F.R. § 54.201(c).

ETC designation. The Commission's authority to grant or deny petitions for ETC designation includes the authority to impose conditions.²

DISCUSSION

YourTel and its Lifeline Offering

4 YourTel's principal office is located in Kansas City, Missouri. It has been an ETC providing Lifeline service since 2003. It has been designated as an ETC for its wireline operation in Kansas, Missouri, Oklahoma and Illinois. It is an ETC for its wireless operation in Kansas, Missouri and Illinois.

5 YourTel offers the following Lifeline plans:

Free Minutes	Text Messages	Can Unused Minutes Roll Over to the Next Month?
68 minutes	1 text message = 0.3 minute	Yes Unused rolled-over minutes expire in 60 days.
125 minutes	1 text message = 1 minute	Yes Unused rolled-over minutes expire in 60 days.
250 minutes	1 text message = 1 minute	No
2000 minutes (tribal Plan)	1 text message = 1 minute	No

6 YourTel charges \$60 activation fee for commencing service. With the federal Link Up support, the activation fee will be reduced to \$30 for Lifeline customers.

7 Customers can purchase additional minutes by phone, at YourTel website or at YourTel authorized agent locations. Additional minutes come in increments of \$5, \$10, \$15, \$20, \$30 and \$50. Depending on the value of the purchase, additional voice minutes are priced as low as 3.5 cents per minute. All minutes expire after 30 days from the purchase date.

8 In its amendment to petition filed on April 19, 2011, YourTel added description for its tribal Lifeline plan. The tribal plan offers 2000 voice minutes for \$1.00 for eligible residents of tribal areas in Washington. Unused minutes cannot roll over from month to month under the tribal plan.

² *In the Matter of the Petition of TracFone Wireless, Inc. for Exemption from WAC 480-123-030(1)(d),(f) and (g); and Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Lifeline Support from the Federal Universal Service Fund*, Order 03 (June 24, 2010), UT-093012, ¶ 78. [UTC TracFone Proceeding].

Federal ETC Requirements

- 9 Staff finds YourTel qualifies for ETC designation if the designation is accompanied with proposed conditions in Appendix B. Pursuant to 47 U.S.C. § 214(e)(2), state commissions may designate additional carriers as ETCs if such designation is “consistent with the public interest, convenience, and necessity” and the carrier seeking designation as an ETC meets the two requirements of 47 U.S.C. § 214(e)(1):
- (A) offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using media of general distribution.
- 10 YourTel demonstrates in its petition and amendments that it is capable of providing telecommunications services supported by the federal USF, as specified in 47 C.F.R. § 54.101(a), and it will adequately advertise the services to reach those who likely qualify for Lifeline telephone assistance.
- 11 YourTel will provide the USF-supported services with a combination of its own facilities and resale from Sprint Nextel Corporation. YourTel owns and operates a central office switch and proprietary call management intelligence located in Kansas City, Missouri. The switch will be used to process calls for directory assistance, operator services and international long distance toll service. Because directory assistance and operator services are two components of the basic telephone service supported by the federal USF, Staff considers the Company meets the minimal facility requirements prescribed by the Federal Communications Commission (FCC). The FCC defines “facilities” as “physical components of the telecommunications network that are used in the transmission or routing of the services designated for support under section 254(c)(1).”³ The FCC further explains facility requirement for ETC applicants as follows: “The statute does not require a carrier to use its own facilities to provide each of the designated services but, instead, permits a carrier to use its own facilities to provide at least one of the supported services...if a carrier uses its own facilities to provide at least one of the designated services, and the carrier otherwise meets the definition of "facilities" adopted above, then the facilities requirement of section 214(e) is satisfied. For example, we conclude that a carrier could satisfy the facilities requirement by using its own facilities to provide access to operator services, while providing the remaining services designated for support through resale.”⁴
- 12 As in the proceedings of TracFone and Virgin Mobile ETC petitions, Staff recommended additional conditions to ensure the Company will provide Lifeline services in a manner

³ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45. FCC 97-157 (rel. May 98, 1997), ¶ 151.

⁴ *Id.*, ¶ 169.

consistent with the public interest. Staff proposes the Commission apply the same conditions to YourTel's ETC designation.

- 13 The FCC has granted a number of resale-based wireless providers forbearance from the requirement under section 214(e)(1)(A) of the Act that an ETC applicant must provide services, at least in part, over its own facilities.⁵ The forbearance is contingent upon several conditions. As Staff discussed in recommendation on Virgin Mobile's ETC designation, the FCC's forbearance conditions has strong relevance to public interest, regardless whether the ETC petitioner has its own facilities or not. They include requirements related to E911 provision and customer eligibility verification. Even though YourTel petitions for ETC designation as a facility-based carrier, it commits, in its initial petition and subsequent amendments, to the same conditions the FCC imposes on non-facility-based ETCs for forbearance from the facility requirement.

Washington State ETC Requirements and Exemptions

- 14 YourTel meets all but three Washington state rules on ETC designation under WAC 480-123-030. WAC 480-123-030(1)(d) requires all ETC applicants to provide a substantive plan of the investments to be made with initial federal support during the first two years in which support is received and a substantive description of how those expenditures will benefit customers. WAC 480-123-030(1)(f) requires wireless ETC petitioners to provide a digital map showing locations of cell sites and signal coverage. WAC 480-123-030(1)(g) specifies back-up power requirements for wireless petitioners. The Company seeks exemption from the three rules because they are intended to apply to high cost fund recipients who have the obligation to build out and maintain network infrastructure. The Company only seeks Low Income Support. Staff recommends the Commission grant YourTel's request to be exempted from WAC 480-123-030(1)(d), (f) and (g). The exemption is consistent with the public interest, the purposes underlying regulation, and applicable statutes.

Washington State Conditions on YourTel's ETC Designation

- 15 YourTel's ETC petition is very similar to TracFone and Virgin Mobile's petitions in nature. Staff recommends the Commission impose the same set of conditions on YourTel's ETC designation as the Commission did on TracFone and Virgin Mobile because the rationale underlying each condition is applicable in this proceeding.⁶ These

⁵ For example, *In the Matter of Federal-State Joint Board on Universal Service; Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, Order, CC Docket No. 96-45. FCC 05-165 (rel. September 8, 2005) and *In the Matter of Federal-State Joint Board on Universal Service, et al.*, Order, CC Docket No. 96-45. FCC 09-17 (rel. March 5, 2009); also see *In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A), et al.*, Order, CC Docket No. 96-45. FCC 09-18 (rel. March 5, 2009).

⁶ For detailed discussion of the conditions, see *UTC TracFone Proceeding*, Staff Memo for the November 25, 2009 Open Meeting, Order 03 (June 24, 2010) and Order 05 (October 13, 2010), UT-093012; also see *In the Matter of the Petition of for an Exemption from WAC 480-123-030(1)(d) and Designation as an Eligible Telecommunications Carrier*, Order 01 (November 10, 2010), UT-100203.

conditions were proposed to protect consumers' interests and safeguard the integrity of the federal USF.

16 Customer eligibility verification remains Staff's biggest concern. In the FCC's recent Notice for Proposed Rulemaking,⁷ the FCC proposes a number of measures to make the customer eligibility verification process more rigorous. Before any changes are implemented at the federal level, however, Washington's conditions on prepaid Lifeline ETC designation are necessary to detect and alleviate the problem of fraud, waste and abuse of the Lifeline fund. The Company will abide by the following procedure of customer eligibility verification, as prescribed by the federal rule and Washington's conditions on its ETC designation:

- The Company shall use the list of WTAP-eligible public assistance programs in WAC 388-273-0020 (1) (not the list in 47 C.F.R. § 54.409(b)) as well as the federal income-based eligibility criteria. The use of the list of state public assistance programs is to ensure that the Washington Department of Social and Health Services (DSHS) can verify the Company's customer records.
- The Company must use customers' self-certification forms to process program-based Lifeline applications, as prescribed by 47 C.F.R. § 54.409(d); the Company should follow 47 C.F.R. §54.410(a) and (b) to process income-based Lifeline applications.
- The Company will follow 47 C.F.R. §54.410(c)(2) to select a statistically valid random sample of the Company's Lifeline consumers to verify their continued eligibility and collect proof documents. The Company should report the survey result to the Universal Service Administration Company (USAC). The Company should file a copy of the survey result to the Commission by August 31 of each year.
- Annually, YourTel shall notify each Lifeline customer prior to the service anniversary date, requiring them to confirm the continued eligibility by self-certification. Any customers who do not confirm their eligibility within 30 days of receipt of the verification notice should be removed from the Lifeline program.
- To process Lifeline applications based on participation in qualifying public assistance programs, the Company shall cooperate with the Commission and the DSHS to work out a procedure to verify the applicant's eligibility. The Company should obtain access to the DSHS' online database to verify whether an applicant is receiving one of the qualifying public assistance benefits.
- To process Lifeline applications based on income criteria, the Company will follow the income certification and verification requirements in 47 C.F.R. § 54.410 and other applicable instructions from the FCC and the USAC. The Company should require such customers to present documentations of their household income prior to enrollment.
- By March 31 of each year, the Company shall file with the Commission its complete Lifeline customer records of the prior calendar year. The customer

⁷ *In the Matter of Lifeline and Link Up Reform and Modernization, Federal-State Joint Board on Universal Service, Lifeline and Link Up*, Notice of Proposed Rulemaking, CC Docket No. 96-45. FCC 11-32 (rel. March 4, 2011).

records are subject to review of the Commission and DSHS. The records must have all the necessary information and be in an electronic format required by DSHS. After being notified of the results of the review, the Company must take appropriate measures to either correct the customer records or stop providing services to ineligible customers and report the resolutions to the agencies within 60 days of the notice.

FINDINGS AND CONCLUSIONS

- 17 (1) The Commission has jurisdiction over eligible telecommunications carriers in Washington and the subject matter of this Order pursuant to 47 U.S. C. § 214(e)(2), 47 C.F.R. §§ 54.201(b)-(c) and WAC 480-123-040.
- 18 (2) YourTel commits to offer all services that are to be supported by the federal universal service support mechanisms set forth in 47 U.S.C. § 254(c) and 47 C.F.R. § 54.101(a).
- 19 (3) Subject to the conditions in this Order, YourTel meets the requirements for ETC designation under 47 U.S. C. § 214(e)(1), 47 C.F.R. § 54.201(d) and WAC 480-123-030.
- 20 (4) The Commission finds that granting the Company's petition for an exemption from the requirement of submitting an investment plan in WAC 480-123-030(1)(d) is consistent with the public interest, the purposes underlying regulation, and applicable statutes.
- 21 (5) The Commission finds that granting the Company's petition for designation as an Eligible Telecommunications Carrier for the purpose of receiving federal Lifeline and Link Up support, subject to the conditions in this Order, will advance the purposes of universal service found in 47 U.S.C. § 254. The designation will benefit low-income households in Washington. The designation is in the public interest and should be granted subject to the conditions set forth in Appendix B to this Order.
- 22 (6) The Commission should retain jurisdiction over the subject matter and the parties to effectuate the terms of this Order.
- 23 (7) The Commission should reserve the right to modify the ETC designation and the conditions, depending upon other factors. Such factors may include but are not limited to changes in FCC rules on Low Income Support, including rules on facility requirement and procedure of customer eligibility verification, the

company's operation performance in Washington, and the results of the federal and state verification results of its Lifeline customers' eligibility.

ORDER

THE COMMISSION ORDERS:

- 24 (1) The Commission grants the petition of YourTel America, Inc., for an exemption from WAC 480-123-030(1)(d), (f) and (g) which requires an ETC applicant to provide a substantive two-year plan of the investments to be made with initial federal support and the associated customer benefits, a digital map of its wireless network, and compliance to specific power backup standards.
- 25 (2) The Commission grants the petition of YourTel America, Inc., for designation as an Eligible Telecommunications Carrier for the purpose of receiving Lifeline and Link Up support from the federal Universal Service Fund in service areas specified in Appendix A to this Order. The designation is subject to the conditions set forth in Appendix B to this Order.
- 26 (3) YourTel America, Inc., must comply with applicable federal laws and regulations on ETC obligations and requirements.
- 27 (4) YourTel America, Inc., must comply with Washington's rules on ETC obligations and requirements set forth in WAC 480-123.
- 28 (5) The Commission retains jurisdiction over the subject matter and the parties to this proceeding.
- 29 (6) The Commission has authority to modify, suspend, or revoke YourTel America, Inc.'s ETC designation granted in this Order at a future date.

DATED at Olympia, Washington, and effective June 16, 2011.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

JEFFREY D. GOLTZ, Chairman

PATRICK J. OSHIE, Commissioner

Appendix A

YourTel America, Inc.
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

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	LIND
	MATHEWS CORNER
	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

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	CASHMERE
	CHELAN
	CONCRETE
	CONWAY
	CUSTER-GTLD
	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

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	QUINCY
	RICHLAND
	RICHMOND BEACH
	ROCKFORD
	ROSALIA
	SEDRO WOOLLEY
	SEDRO WOOLLEY-CONTEL
	SILVER LAKE
	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

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	DEER PARK
	DES MOINES
	EASTON
	ELK
	ENUMCLAW
	EPHRATA
	GRAHAM
	GREEN BLUFF
	HOODSPORT
	ISSAQUAH
	KENT
	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

<u>INCUMBENT LOCAL EXCHANGE CARRIER</u>	<u>EXCHANGE</u>
	TACOMA WAVERLY
	VANCOUVER
	WAITSBURG
	WARDEN
	WINLOCK
	YAKIMA
UNITED TELEPHONE - NORTHWEST	
	CHIMACUM-CENTER
	COLUMBIA
	DALLESPORT
	GOLDENDALE
	GRANDVIEW
	GRANGER
	HARRAH
	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

Appendix B

1. YourTel America, Inc. (YourTel or Company) designation as an Eligible Telecommunications Carrier (ETC) shall be for an interim period of one year from the effective date of the Commission's Order approving such designation, subject to Commission review. Before the end of one year after the effective date of the Order, YourTel may seek to renew its designation pursuant to WAC 480-123-030 through -040. YourTel's designation for the interim period shall continue until the Commission's decision to the designation.
2. Within 30 days of approval of its ETC designation in Washington and prior to offering Lifeline services, YourTel must make a compliance filing for approval by the Commission containing the following:
 - a. YourTel's Lifeline rate plans, terms and conditions. The rates, terms and conditions shall include all provisions that apply to the Lifeline services offered by YourTel in Washington and detailed procedures explaining how customers can participate in a particular Lifeline plan.
 - b. YourTel's proposed language to be used in all advertising of Lifeline services and on its websites. The language shall include information directing customers to the Washington State Office of the Attorney General for complaints regarding any Lifeline service issues.
 - c. YourTel's Lifeline Customer Application Form.

Commission Staff shall review YourTel's compliance filing and recommend to the Commission whether it should be approved or rejected within ten business days. YourTel shall not offer Lifeline services until the Commission has approved its compliance filing.

3. YourTel shall file with the Commission any future changes to its rates, terms, or conditions at least one day prior to the effective date of the change.
4. The information on YourTel's rates, terms and conditions shall be provided in a package sent to Lifeline customers after enrollment in YourTel's Lifeline program, as well as at YourTel's official Lifeline websites.
5. YourTel shall also provide Lifeline customers with the choice of all other rate plans available to its regular customers.
6. During this interim period (i.e., the time until the Commission issues an order recertifying YourTel's ETC designation for Lifeline services), YourTel must offer a minimum of 250

minutes. The Company may invoke Condition No. 3 only for the purpose of increasing the number of minutes in the Lifeline plan.

7. YourTel shall deactivate a Lifeline account if the customer has no usage for 60 consecutive days. No fewer than eight business days before deactivation, YourTel shall send the customer a written notice by mail about the potential deactivation and ways to avoid unwanted deactivation. The customer shall have a 30 day grace period from the deactivation date to reactivate the Lifeline account by making a call. When a customer reactivates the account, the customer will be able to use the allotment of free minutes deposited into the customer's account by YourTel.
8. On a quarterly basis beginning with the quarter ending on September 30, 2011, YourTel shall provide the number of Lifeline customers that it enrolls each month. YourTel shall also report the number of deactivated Lifeline customers each month by service plan and the reasons for deactivation (e.g., no usage for 60 consecutive days, annual verification unsuccessful, or voluntary exit). Quarterly reports shall be filed with the Commission no later than 30 days after the end of each quarter.
9. YourTel shall respond within 30 days to Commission Staff's information requests on YourTel's Lifeline operations, including but not limited to Lifeline customers' usage patterns and Lifeline customer records.
10. YourTel shall cooperate with the Commission and the Department of Social and Health Services (DSHS) to work out a procedure to verify YourTel Lifeline customers' eligibility.
11. YourTel must not deduct airtime minutes for calls to customer care made from the customer's handset by dialing 611. YourTel shall explicitly state the policy of free 611 calls in its Lifeline service agreements. YourTel may require the customer to call the toll-free customer care number from another phone if necessary to resolve technical issues related to the handset or its programming.
12. By March 31 of each year, YourTel shall file with the Commission its complete Lifeline customer records of the prior calendar year. The customer records are subject to review of the Commission and DSHS. The records must have all the necessary information and be in an electronic format required by DSHS. After the Commission and DSHS notify YourTel of the results of the review, YourTel must take appropriate measures to either correct the customer records or stop providing services to ineligible customers and report the resolutions to the agencies within 60 days of the notice.
13. YourTel shall provide the Commission a copy of its annual Lifeline Verification survey results that it files with the Universal Service Administration Company (USAC) by August 31 of each year.

14. YourTel shall file with the Commission, by March 31 of each year, a report on the number of complaints, categorized by the different nature of complaints that it received from Washington Lifeline customers during the prior calendar year (e.g., billing disputes and service quality complaints). This report shall include complaints filed with YourTel, the Commission's Consumer Protection and Communications Section, the Washington State Office of the Attorney General, and the Federal Communications Commission (FCC). The Commission reserves the rights to revoke YourTel's ETC designation if YourTel fails to provide reasonable quality of service.
15. YourTel shall 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.
16. YourTel shall 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.
17. YourTel shall 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 YourTel's proprietary software and technical assistance should call delivery discrepancies be discovered.
18. YourTel shall comply with rules on cessation of business as specified in WAC 480-120-083.
 - a. Prior to cessation of business, YourTel shall make arrangements with its underlying carriers to provide minutes already sold to customers under the same terms and conditions it has with the customers, or provide refunds to the existing customers.
 - b. YourTel shall provide written notice to the following persons at least 30 days in advance of cessation of service:
 - i. The Commission;
 - ii. The state 911 program;
 - iii. Each of its customers;
 - iv. The national number administrator.
 - c. The notice to the Commission and the state 911 program must include the same information required by WAC 480-120-083 (3).
 - d. The notice to the customers must include the same information required by WAC 480-120-083 (4).

- e. The notice to the national number administrator must include the same information required by WAC 480-120-083 (7).
 - f. YourTel shall file with the Commission at least 30 days in advance of its cessation of business and request the relinquishment of its ETC designation in Washington.
19. YourTel shall collect and maintain necessary records and documentation to ensure its compliance with the applicable FCC and Commission requirements, including existing requirements and any future modifications. The records and documentation shall be provided to Commission Staff upon request.
 20. YourTel shall cooperate with Commission Staff on phone number conservation issues and shall comply with 47 C.F.R. § 52.
 21. YourTel shall comply with all applicable federal and Washington's statutes and regulations, including Enhanced 911 tax contributions.