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June 9, 2011

**VIA OVERNIGHT DELIVERY**

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

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

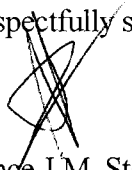
Dear Mr. Danner:

Enclosed please find for filing an original and twelve (12) copies of i-wireless, LLC's amendment to its Petition for Designation as an Eligible Telecommunications Carrier in the above-referenced docket.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for i-wireless, LLC

Enclosures

cc: Mr. Patrick McDonough

RECEIVED  
RECORDS MANAGEMENT  
2011 JUN 10 AM 9:52  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET NO. UT-101640
i-wireless, LLC	)	PETITION OF I-WIRELESS,
	)	LLC FOR DESIGNATION
For Designation as an Eligible Telecommunications	)	AS AN ELIGIBLE
Carrier in the State of Washington for the Limited	)	TELECOMMUNICATIONS
Purpose of Offering Lifeline Service to Qualified	)	CARRIER
Households	)	

**AMENDMENT TO PETITION OF I-WIRELESS, LLC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF WASHINGTON FOR THE LIMITED PURPOSE OF  
OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS**

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*Attorney for i-wireless, LLC*

June 9, 2011

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET NO. UT-101640
i-wireless, LLC	)	PETITION OF I-WIRELESS,
For Designation as an Eligible Telecommunications	)	LLC FOR DESIGNATION
Carrier in the State of Washington for the Limited	)	AS AN ELIGIBLE
Purpose of Offering Lifeline Service to Qualified	)	TELECOMMUNICATIONS
Households	)	CARRIER
	)	

**AMENDMENT TO PETITION OF I-WIRELESS, LLC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF WASHINGTON FOR THE LIMITED PURPOSE OF  
OFFERING LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS**

**I. INTRODUCTION**

i-wireless, LLC (“i-wireless” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and Section 480-123-030 of the Washington Administrative Code (“WAC”), hereby amends its Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Washington which was filed with the Washington Utilities and Transportation Commission (“Commission”) on September 30, 2010.

**II. I-WIRELESS’ UNIVERSAL SERVICE OFFERING**

Given the increasing competitive environment of wireless ETCs, i-wireless has enhanced its Lifeline offering and proposes to give eligible customers three (3) Lifeline Plan choices:

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<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

1. 150 Anytime Minutes Plan. Under the 150 Anytime Minute Plan, eligible customers enjoy a free handset, 150 anytime minutes, rollover minutes, free incoming text messages, free customer care calls and participation in the Kroger loyalty Free Minute program, whereby they can earn free minutes simply by grocery shopping (shopping using SNAP/Food Stamps, WIC and other government forms of subsidy qualifies for the loyalty program just like US dollar currency).
2. 250 Anytime Minutes Plan. Under this Plan, eligible customers receive a free handset and 250 anytime minutes. Customers will not qualify for the perks listed above, forgoing these for the higher level of minutes.
3. \$15 Retail Discount Plan. The third option allows Lifeline eligible customers to choose from any i-wireless monthly retail plan<sup>3</sup> at a \$15 discount. Under this \$15 Retail Discount Plan, a customer can, for example, pay \$10 additional per month (plus applicable taxes) and receive 200 anytime minutes, unlimited text messaging and 200 megabytes of data, plus all of the perks listed under the 150 minute plan.

Please see attached Exhibit 1 for a detailed description of each Plan. i-wireless has branded its Lifeline offering, “Access Wireless.” i-wireless believes that the 150 Minute Plan will be the most feature-rich, customer-friendly plan of its kind. For customers who prefer more minutes and less “perks”, i-wireless offers the 250 Minute Plan. And finally, to allow customers even greater flexibility, i-wireless proposes to offer the \$15 Retail Discount Plan. Customers can change their plan on their monthly plan date, without penalty, should they determine that another plan better meets their needs or if their needs change. i-wireless asserts that its proposed Lifeline offering affords more flexibility to the customer than the offerings of its prepaid wireless

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<sup>3</sup> Except a Text Only Plan.

competitors. Exhibit 1 also details i-wireless' tribal offering. The basic offering will be an unlimited voice plan. This plan retails for \$40, but tribal land residents would pay \$1 out-of-pocket for this plan. Alternatively, tribal land residents may apply \$39 towards any retail plan, such as i-wireless' \$60 – unlimited talk, unlimited text messaging and 2.5 gigabyte data plan. This will give tribal land residents a choice of plans to meet their needs.

i-wireless Lifeline customers will have access to the same exceptional customer care provided to retail customers. The Company contracts with a high quality, U.S. domestic customer care group whose hold time is among the lowest not only in the prepaid wireless industry, but the postpaid wireless industry as well. i-wireless' exceptional customer service is free on all plans, except the 250-Minute option. i-wireless offers the 250-Minute option for those customers who prefer a larger bucket of free minutes to the “perks” included in all other Lifeline and retail plans. i-wireless cannot offer the 250-Minute plan with free customer care calls, as i-wireless maintains a level of customer care that is costly (hold time has been less than 2 minutes in each of the past 6 months - with the average being 1 minute 22 seconds, the highest at 1 minute 45 seconds and the lowest at 40 seconds - while its competitors have wait times of 20 minutes or more; call center is located in the U.S. while many competitors outsource their customer service overseas) and therefore would not be able to remain profitable. The 250-Minute plan offers customers an additional choice and helps illustrate the extra value in the Company's 150-Minute plan. i-wireless' Lifeline plan options, viewed as a complete package, afford the customer beneficial service plans as well as choice and flexibility, and are in the public interest.

### **III. FCC COMPLIANCE PLAN**

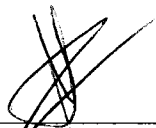
One of the conditions of the Company's grant of forbearance from the facilities based requirement from the FCC was that i-wireless file, within thirty days of the effective date of the

order, a plan outlining the measures the Company would take to implement the obligations of the order.<sup>4</sup> i-wireless filed its Compliance Plan with the FCC on July 26, 2010 and has thus fulfilled the requirement.<sup>5</sup> Furthermore, i-wireless has made additional voluntary commitments in an effort to combat waste, fraud, and abuse of the Universal Service Fund (“USF”) program, and has stated its willingness to comply with any future FCC rule changes.<sup>6</sup>

#### IV. CONCLUSION

i-wireless respectfully submits that the information provided herein should remove any remaining impediment to prompt Commission approval of the Company's request for designation as an ETC for the limited purpose of offering Lifeline services. Rapid grant of i-wireless' request would enable the Company to commence much needed Lifeline services to eligible Washington residents as soon as possible.

Respectfully submitted this 9 day of June, 2011.

  
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Lance J.M. Steinhart, P.C.  
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*Attorney for i-wireless, LLC*

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<sup>4</sup> *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) (“*Forbearance Order*”) ¶ .

<sup>5</sup> A copy of i-wireless' Compliance Plan was attached as Exhibit 4 to the Company's Petition.

<sup>6</sup> See attached Exhibit 2 for copies of ex parte letters i-wireless has filed with the FCC in regards to the Company's Compliance Plan.

## EXHIBIT 1

### i-wireless, LLC's Lifeline Rates (Non-Tribal)

#### **Option 1: Lifeline 150 Minutes Plan\***

150 anytime minutes per month

(additional usage priced at 10 cent minutes and 10 cent text messages)

Net cost to Lifeline customer: \$0

*\*includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 150 minutes can be rolled over to following month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

#### **Option 2: Lifeline 250 Minutes Plan\***

250 anytime minutes per month

(additional usage priced at 10 cent minutes and 10 cent text messages)

Net cost to Lifeline customer: \$0

*\*includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to 911 emergency services
- Free balance inquiries

*\*\*additional charges apply for:*

- incoming text messages (charge per text: 10 cents; one text message decrements one minute of use)
- calls to Customer Service (minutes decrement from customers 250 minutes)

*\*\*\*additional restrictions:*

- Minutes cannot be rolled over to next month
- Customer not eligible to earn additional free minutes through Kroger Free Minute Loyalty Program

## **i-wireless, LLC's Lifeline Rates (Non-Tribal) - Continued**

### **Option 3: Lifeline \$15 Retail Discount Plan\***

Lifeline eligible customers may choose any i-wireless monthly retail plan (excluding text only plans) at a \$15 discount. The following retail monthly plans are available as of February 2011:

#### **Talk Plans (monthly)**

- 200 anytime minutes, unlimited text messages, and 200 megabytes of data (web browsing and e-mail on capable phones) (additional usage priced at 10 cent minutes)  
Net cost to Lifeline customer: **\$10** (plus applicable taxes and fees)
- 1,000 minutes, unlimited text messages and 500 megabytes of data (web browsing and e-mail on capable phones) (additional usage priced at 10 cent minutes)  
Net cost to Lifeline customer: **\$25** (plus applicable taxes and fees)
- Unlimited talk (10 cents per text message; data packs sold separately starting at \$5 or customers may pay by the megabyte)  
Net cost to Lifeline customer: **\$25** (plus applicable taxes and fees)
- Unlimited talk, unlimited text messages and 2.5 gigabytes of data (web browsing and e-mail on capable phones)  
Net cost to Lifeline customer: **\$45** (plus applicable taxes and fees)

#### *\*includes:*

- Free handset
- Free Voicemail, Caller-ID and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 1500 minutes can be rolled over to next month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program



## **i-wireless, LLC's Lifeline Rates (Tribal)**

### **Option 1: Lifeline Unlimited Talk\***

Unlimited monthly voice usage

(outgoing text messages priced at 10 cents per message, data usage priced at \$1.00 per megabyte and billed in 500 kilobyte increments)

Net cost to Tribal Lifeline customer: **\$1**

### **Option 2: \$39 Retail Discount Plan\***

Lifeline eligible tribal customers may choose any i-wireless monthly retail plan (excluding text only plans) at a \$39 discount. The retail monthly plans that are available as of February 2011:

#### Talk Plans (monthly)

- 1,000 minutes, unlimited text messages and 500 megabytes of data (web browsing and e-mail on capable phones) (additional usage priced at 10 cent minutes)  
Net cost to Lifeline customer: **\$1** (plus applicable taxes and fees)
- Unlimited talk, unlimited text messages and 2.5 gigabytes of data (web browsing and e-mail on capable phones)  
Net cost to Lifeline customer: **\$21** (plus applicable taxes and fees)

#### *\*Both Options includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 1500 minutes can be rolled over to following month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

**EXHIBIT 2**

**Lance J.M. Steinhart, P.C.**

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Alpharetta, Georgia 30005

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January 7, 2011

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Ex Parte Communication: WC Docket No. 09-197

Dear Ms. Dortch:

i-wireless, LLC (“i-wireless” or the “Company”), by its undersigned counsel, hereby outlines certain voluntary commitments that the Company agrees to implement to combat the potential for waste, fraud and abuse with respect to its provision of Lifeline services. The Company requests that the Commission incorporate these procedures into its compliance plan currently pending approval in the above-referenced docket, and also agrees to be bound by the procedures described herein in connection with the Commission’s approval of the Company’s pending request for designation as an eligible telecommunications carrier (“ETC”) in the states of Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia.

**I. Voluntary Commitments**

i-wireless recognizes the importance of safeguarding the Commission’s low-income universal service program. i-wireless supports the consolidation of enrollment data for all Lifeline service subscribers through a centralized database that is independently administered, and requires participation by all ETCs. However, until the Commission implements regulations of general applicability regarding households receiving multiple Lifeline discounts in contravention of Lifeline rules as well as treatment of inactive prepaid Lifeline accounts, i-wireless will implement the following procedures designed to avoid waste, fraud, and abuse. Specifically, i-wireless commits to:

- Provide state commissions (PUC) with data that will enable the states to track whether some consumers are enrolled in more than one Lifeline program. Specifically, i-wireless agrees to make available state-specific customer data, including name and address, to

each state PUC where it operates for the purpose of permitting the PUC to determine whether an existing Lifeline customer receives Lifeline service from another carrier;

- Promptly investigate any notification that it receives from a state PUC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if i-wireless' investigation concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations;
- Implement a non-usage policy whereby i-wireless will identify Lifeline customers that have not used the Company's Lifeline service for 60 days, and cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period.<sup>1</sup> Specifically, if no usage appears on an i-wireless Lifeline customer's account during any continuous 60-day period, i-wireless will promptly notify the customer that the customer is no longer eligible for i-wireless Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but i-wireless will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, receiving or sending a text message, downloading data or adding money to the account), i-wireless will deactivate Lifeline services for that customer. In addition, i-wireless will not seek to recover a federal Universal Service Fund subsidy for the free minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497.

i-wireless agrees to comply with the above conditions in any and all states where it is designated as an ETC by the Commission within 30 days of the effective date of such designation.

## **II. Key Partnerships**

i-wireless believes that the first line of defense against fraud and abuse is to partner with high quality channels and organizations. By emphasizing the social benefits of the program and partnering with those focused on the benefits to their constituents, the Company believes that it can avoid potential misuse of the program. To further protect the integrity of the Universal Service Fund ("USF"), i-wireless has contracted with: (a) Solix, a well-known, experienced and

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<sup>1</sup> i-wireless will consult with the PUCs in the states where it provides Lifeline services regarding implementation of the policy described above. i-wireless expects that certain state PUCs or similar agencies may seek to incorporate state-specific variations to the policy. Consequently, i-wireless may modify the parameters of the inactivity policy described herein after consultation with the respective state PUCs.

*i-wireless, LLC*

January 7, 2011

Page 3

reputable firm in the USF industry, to assist in reviewing customer applications and verifying eligibility, and to ensure that i-wireless is in compliance with federal and state regulations at all times; and (b) CGM, LLC of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate i-wireless' subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from i-wireless will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, i-wireless ensures that it does not over-request from support funds.

### **III. i-wireless' Compliance Plan and ETC Petition Should Be Granted Without Further Delay**

i-wireless submits that the voluntary commitments described herein should remove any remaining impediments to prompt approval of the Company's compliance plan and outstanding request for ETC designation. i-wireless is aware of the Federal-State Joint Board on Universal Service's November 2010 recommended decision that the Commission adopt certain recommendations concerning the USF low-income programs. i-wireless is willing to abide by future regulations implemented by the Commission, and even looks forward to working actively with the Commission to implement industry-wide procedures that will better protect the federal USF mechanisms. In the meantime, i-wireless asserts that it has taken appropriate steps to ensure program integrity, and the Company should be granted the opportunity to introduce much-needed competition into the prepaid wireless ETC market, ensuring that lower-income customers have access to a broader array of Lifeline services during this period of extended economic hardship.

Swift action by the Commission on these long-standing requests will advance the program's goals and serve the public interest. i-wireless respectfully requests approval of its pending compliance plan and ETC designation request without further delay.

Respectfully submitted,

/s/

Lance J.M. Steinhart  
Attorney for i-wireless, LLC

cc: Pat McDonough

**Lance J.M. Steinhart, P.C.**

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May 13, 2011

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Ex Parte Communication: WC Docket No. 09-197

Dear Ms. Dortch:

On May 12, 2011, Pat McDonough, General Manager of i-wireless, LLC's ("i-wireless" or the "Company") Access Wireless, Lifeline division, met with staff from the Wireline Competition Bureau's Telecommunications Access Policy Division ("TAPD") to discuss the Lifeline program and i-wireless' pending Compliance Plan. TAPD staff present in the meeting were Trent Harkrader, Chief, TAPD; Vickie Robinson, Deputy Chief, TAPD; Joseph Cavendish, Attorney Advisor, TAPD; and Romanda Williams, Attorney Advisor, TAPD. During this meeting, discussion centered on the state of the Lifeline program, the Commission's NPRM on Lifeline and Link Up Reform, compliance issues such as the 60-day non-usage policy, the national database and the one phone per household rule, and additional support for the further evaluation of i-wireless' compliance environment and Compliance Plan. i-wireless intends to respond to the NPRM.

i-wireless would welcome approval of its Compliance Plan conditioned upon i-wireless' compliance with upcoming reform regarding the Lifeline program; i-wireless has already committed to comply with future changes in regulations. i-wireless' Compliance Plan and subsequent voluntary commitments demonstrate that the Company has taken appropriate steps to ensure program integrity and should be granted the opportunity to introduce much-needed competition into the prepaid wireless ETC market, ensuring that low-income customers have access to a broader array of Lifeline services during this period of extended economic hardship.

*i-wireless, LLC*

May 13, 2011

Page 2

Prompt approval of the Company's Compliance Plan and outstanding request for ETC designation will advance the program's goals and serve the public interest. i-wireless respectfully requests approval of its pending Compliance Plan and ETC designation request without further delay.

Respectfully submitted,

/s/

Lance J.M. Steinhart  
Attorney for i-wireless, LLC

cc: Pat McDonough  
Trent Harkrader  
Vickie Robinson  
John Nakahata

May 25, 2011

Ex Parte

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: **CORRECTED VERSION** *Telecommunications Carriers Eligible to Receive  
Universal Service Support*, WC Docket No. 09-197

Dear Ms. Dortch:

On May 25, 2011, Pat McDonough, Vice President of i-wireless LLC (“i-wireless”) and I, on behalf of i-wireless, met with Zachary Katz, Wireline Legal Advisor to Chairman Genachowski, Sharon Gillett, Chief, Wireline Competition Bureau, Dana Shaffer, Deputy Managing Director, Trent Harkrader, and Kimberly Scardino, to discuss the aforementioned proceeding. Attached, is a copy of the material presented during the meeting.

We discussed i-wireless’ pending compliance plan, submitted under its forbearance order, and steps that i-wireless could take to provide Lifeline services while protecting the integrity of the Universal Service Fund. i-wireless distributed and discussed the attached summary of several proposed safeguards. i-wireless requested that the Commission move forward with consideration of both its compliance plan and pending ETC application, and act upon those forthwith.

Sincerely,



John T. Nakahata  
*Counsel to i-wireless, LLC.*

cc: Zachary Katz  
Sharon Gillett  
Dana Shaffer  
Trent Harkrader  
Kimberly Scardino  
Lance Steinhart  
Pat McDonough  
Heather Kirby

Attachment



i-wireless  
Summary of Key Compliance Plan Commitments  
and Associated Systems, Policies & Procedures

Initial and Annual Verification/Certification

In its compliance plan, i-wireless affirmed that it will require all Lifeline customers initially and annually to certify to i-wireless, under penalty of perjury, that they still qualify for Lifeline service, are the head of household and receive Lifeline service only from i-wireless. The initial and annual certification language is as follows:

**Disclosure Statement:** By signing below, I certify under penalty of perjury that the information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law. I understand that lifeline is only available for one landline or one wireless phone line per household. I am the head of household and will only receive Lifeline from Access Wireless. Furthermore, I certify that I will only use this phone for my family's own use and will not resell it. I will notify Access Wireless immediately if I no longer qualify for Lifeline.

Prevention of Duplicates Lifeline Benefits

In its compliance plan, i-wireless committed to provide state commissions with data that will enable the states to track whether consumers are enrolled in more than one Lifeline program. Specifically, i-wireless agreed to make available state-specific customer data, including name and address, to each state PUC where it operates for the purpose of permitting the PUC to determine whether an existing Lifeline customer receives Lifeline service from another carrier.

i-wireless has established both front end and back end procedures, systems and processes in order to prevent duplicate Lifeline benefits with respect to its own customer base. On the front end, i-wireless has contracted with Solix in order to screen and review applications. This screening process includes insuring that an applicant is not already receiving Lifeline service from i-wireless. i-wireless has also contracted with CGM to screen information prior to filing Form 497 on the back end. If a duplicate is found, it will not be reported on Form 497.

Non-usage Policy

i-wireless has committed to and has developed a non-usage policy whereby i-wireless will identify Lifeline customers that have not used the Company's Lifeline service for 60 days, and will cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. i-wireless has this built into its systems. i-wireless has also contracted with CGM to screen non-usage subscribers out of it Form 497 reporting data.

June 9, 2011

*Ex Parte*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

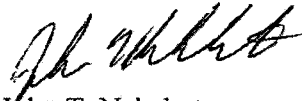
Re: *Telecommunications Carriers Eligible to Receive Universal Service Support, WC*  
Docket No. 09-197

Dear Ms. Dortch:

On June 9, 2011, Pat McDonough, Vice President of i-wireless LLC (“i-wireless”) and I, on behalf of i-wireless, met with Trent Harkrader, Kimberly Scardino, and Divya Shenoy to discuss the aforementioned proceeding. Attached, is a copy of the material presented and discussed during the meeting.

A copy of this letter is being filed in the above-referenced docket.

Sincerely,



John T. Nakahata  
*Counsel to i-wireless, LLC.*

cc: Trent Harkrader  
Kimberly Scardino  
Divya Shenoy  
Lance Steinhart  
Pat McDonough  
Heather Kirby

Attachments

## Access Wireless (i-wireless Lifeline)

### Proposed Procedures/Measures to prevent duplicate phones from being issued to one head-of-household

i-wireless is committed to preventing Lifeline fraud, waste and abuse. In addition to what iwireless has already committed to in its Compliance Plan and prior ex parte letters, iwireless would commit to maintaining and implementing the following procedures and measures to reduce the possibility of signing up a customer for our Lifeline service who already has Lifeline service with another provider. These procedures would be in place pending the Commission's issuance of new rules in its pending Lifeline rulemaking proceeding, and would be modified to conform to those rules and orders, once issued.

i-wireless' business model is such that we have had contact with the majority of our Lifeline customers, whether over the phone with a Solix call center representative or in person with a Kroger/i-wireless representative. These methods of signing up customers will continue to be the prevalent means of subscribing eligible customers.

- A. **Improved in-take communications at sign-up to highlight that Lifeline is available only on a one-per-household basis.** For customers that sign-up over the phone, Exhibit A shows the call center script that i-wireless would use to better prevent the customers from receiving duplicate Lifeline phones. For in person sales, Exhibit B entails the sales training document/checklist i-wireless would provide to a customer service representative for use when a representative is signing up a potential Lifeline customer in person.
- B. **Improved applications and collateral materials.** While the majority of our business is coming from and should continue to come from situations where we have the customer live, we want to make sure that we reinforce the limitation of one Lifeline phone per head-of-household during the customer education/information cycle (collateral/literature and the web) as well as when a customer obtains an application and fills it out for themselves:
  1. Application/Collateral –
    - a. i-wireless would add the following to our application and collateral: “**Note: By law, the Lifeline program is only available for one phone per household.**” We would place this language in a conspicuous place to ensure it is not overlooked. For example, we would modify page 2 of the attached application/brochure\* to place this advisory underneath the rate plan section, in the middle of what is currently the large white space. It would be in bold in an offsetting color and sufficient font to make it hard to miss (example above).
    - b. i-wireless would also revise the form of its current disclosure statement to better ensure that customers read and review the statements to which they are attesting, including initialing each statement.:

**Disclosure Statement:** By signing below, I certify under penalty of perjury – (additionally, please initial each of the 4 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law.
- \_\_\_\_\_

2. I understand that Lifeline is only available for one landline or wireless phone line per household. I am the head of household and will only receive Lifeline from Access Wireless.  
\_\_\_\_\_

3. Furthermore, I certify that I will only use this phone for my family's own use and will not resell it. \_\_\_\_\_

4. I will notify Access Wireless immediately if I no longer qualify for Lifeline, or if I have a question as to whether would still qualify. \_\_\_\_\_

2. Website – At the point on our website ([www.accesswireless.com](http://www.accesswireless.com)) when a customer inputs his/her zip code to verify that Access Wireless/i-wireless offers service in their area, we would use a flashing message (to draw attention to it) that says “Note: By law, the Lifeline program is only available for one phone per household.”<sup>1</sup> We would place this message underneath the graphical icons, above the “How to Qualify” section.

\* Each page of the application will be 8-1/2” X 11”, so it will be larger than viewed in the version attached.

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<sup>1</sup> You can view this screen by inputting a valid zip code (e.g., 60007).

## Exhibit A

**Access Wireless (i-wireless Lifeline) Call Center Script  
Call Initiation – Part 1  
Created February 4, 2011  
Updated May 26, 2011 for discussions with the FCC**

**Greeting: “Thank you for calling Access Wireless. This is (Agent Name). May I please have your last name and the state you are calling from?”**

**\*\* Agent – Perform customer search while asking customer \*\***

- “Are you calling for a new application or to check status?”
- **If status of application:** “May I please have your address?”
- **If new application:** Validate that they are the head of household and that they are not currently receiving a Lifeline subsidized phone with the following line of questioning:
  - a) “Do you currently have wireless or home phone service?” (if no, skip (b) – (e))
  - b) **If yes:** “Is that [wireless or home phone] service a subsidized service or do you pay full price?”
  - c) **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
  - d) **If they are unsure:** “Who is your provider for that service?” (Safelink, Assurance, TSI / Nexus Communications, Smith Bagley or DPI only offer Lifeline so go to (e) – if a more ambiguous provider, e.g., Verizon, Pacific Bell or Illinois Bell, try to question further to determine if they have Lifeline).
  - e) **If it is Lifeline:** “We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us.”

**\*If it is evident that they don’t already have Lifeline service then click on add new customer and fill out appropriate information.**

**Access Wireless (i-wireless Lifeline)  
Sales Training Materials  
Updated May 26, 2011 for discussions with the FCC**

**Refer to the state specific one page Sales Information sheet for state specific, program information.**

If customer is interested in Lifeline service and is eligible under one of the programs or the income threshold listed in the “Who is eligible to receive an Access Wireless phone and Free Service?” section of the state specific information sheet, please complete the following procedures:

1. Ask the following questions:
  - a) “Do you currently have wireless or home phone service?” (if no, skip (b) – (f))
  - b) **If yes:** “Is that [wireless or home phone] service a subsidized or no-charge service, or do you pay full price?”
  - c) **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
  - d) **If they are unsure:** “Who is your provider for that service?” (Safelink, Assurance, TSI / Nexus Communications, Smith Bagley or DPI only offer Lifeline so go to (e) – if a more ambiguous provider, e.g., Verizon, Pacific Bell or Illinois Bell, try to dig further to determine if they have Lifeline).
  - e) **If it is Lifeline:** “We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us.”

If it is evident that they don't already have Lifeline service, then proceed to 2.:

2. Click on “check customer’s address” to perform an address check to insure there isn't already an Access Wireless phone registered to that address.
  - a) If there is an active Access Wireless phone registered at that address, then thank customer for their interest, explain the situation and say “by law, the Lifeline program is only available for one phone per household”.
  - b) If there isn't an active Access Wireless phone registered at that address, proceed to 3.
3. Assist customer in filling out the state specific application. Use the application guide/checklist to make sure it is filled out appropriately. Review the documentation for program/income proof closely against the guidelines to make sure the documentation meets the requirements.



# access WIRELESS

## **What is Access Wireless by i-wireless?**

Access Wireless from i-wireless is a part of the Lifeline Assistance program designed to ensure that quality telecommunications services are available to low-income customers at reasonable and affordable rates. Access provides program and income-eligible customers with a free wireless phone and free monthly service. The phone offers in-demand features: voicemail, text, three-way calling, call waiting, caller ID and access to 911.

## **Who is eligible to receive an Access Wireless phone and Free Service?**

Eligibility guidelines vary by state, but in Illinois, individuals qualify if they participate in a public assistance program such as Food Stamps (SNAP), Medicaid, Low Income Home Energy Assistance Program (LIHEAP), National Free School Lunch, Federal Housing/Section 8 Assistance, Supplemental Security Income (SSI; Not the same as Social Security Benefits) or Temporary Assistance to Needy Families (TANF).

**Note: Lifeline is only available to the head-of-household. Furthermore, there is a limit of only one Lifeline phone per household. Please make sure that the customer does not already receive a Lifeline subsidy from another provider**

## **How to Apply?**

In Illinois, applicants must provide proof of program participation and complete an application (attached). Program documents submitted must be “a valid, dated copy of a document issued by a qualifying agency.” It also needs to show the individual’s name and address. Typically this needs to be a dated enrollment letter showing the name and address of the eligible individual. Submission of a program card typically will not be sufficient because many of the enrollment cards do not show the name, address, or date of eligibility. Many of the state issued cards (i.e. food stamp) only display an ID number similar to the debit card look.

## **What’s included with my Access phone service?**

Access offers eligible customers a free wireless phone and free service. The minutes can be used for local or domestic long distance calling. There are no bills, no long-term contracts, no activation fees, and no recurring fees or surcharges for Access Wireless customers. Upon verification, Access Wireless users may renew their service on an annual basis.

## **Customers may choose between 3 plan options:**

- a. **150 FREE MINUTES**: These minutes will be added on the first day of the monthly service cycle, and may be used for making or receiving voice calls. All incoming text messages and calls to Customer Care are FREE. Unused minutes will be carried over to the next month.
- b. **250 FREE MINUTES**: These minutes will be added on the first day of the monthly service cycle, and may be used for making or receiving voice calls. All incoming and outbound text messages will be deducted at a rate of 1 minute per text. All calls made to Customer Care from the handset will be deducted from the monthly minute allocation. All unused minutes expire at the end of the month. If you run out of minutes within the monthly service period and you have money on your account, each minute of talk or text message will cause a deduction of \$0.10 from your account.
- c. **\$15 Credit** - Customers can apply a \$15 credit (free to the customer) to any retail plan of their choice. In this way, Access Wireless customers can opt into the 200 minute, unlimited text messaging and 200 MB of data plan for only \$10 + tax (this plan is normally \$25 less the \$15 credit).

Apply here to get  
**12 MONTHS OF FREE  
WIRELESS SERVICE**  
and a free phone from Access Wireless.



See details inside brochure for more information on how to sign up.  
Illinois Enrollment Form • [www.accesswireless.com](http://www.accesswireless.com)

\* Access Wireless is a government supported program that ensures anyone can get a mobile phone.

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