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September 24, 2014

VIA EMAIL AND OVERNIGHT DELIVERY

Steven V. King
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
PO Box 47250
1300 S Evergreen Park Drive SW
Olympia WA 98504-7250

Re: In the Matter of the Petition of Telrite Corporation Seeking Designation as an Eligible
Telecommunications Carrier in the State of Washington Pursuant to 47 U.S.C. §
214(e)(2) on a Wireless Basis
Docket No. UT-110321

Dear Mr. King:

Enclosed for filing in the above proceeding are an original and twelve (12) copies of Telrite's
Petition for Renewal of its Designation as an Eligible Telecommunications Carrier in the State of
Washington Pursuant to 47 U.S.C. § 214(e)(2) on a Wireless Basis.

Please do not hesitate to call if you have any questions or concerns. Thank you for your
assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa Rackner".

Lisa Rackner

Enclosures

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	
)	
Telrite Corporation d/b/a Life Wireless)	Docket No. <u>UT-110321</u>
for Designation as an Eligible)	
Telecommunications Carrier in the State of)	
Washington Pursuant to 47 U.S.C. § 214(e)(2))	
on a Wireless Basis (Low Income Only))	

**PETITION OF TELRITE CORPORATION D/B/A LIFE WIRELESS FOR RENEWAL
OF ITS DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN
THE STATE OF WASHINGTON PURSUANT TO 47 U.S.C. § 214(E)(2) AND WAC 480-
123-030 - 040 ON A WIRELESS BASIS (LOW INCOME ONLY)**

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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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OF ITS DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN
THE STATE OF WASHINGTON PURSUANT TO 47 U.S.C. § 214(E)(2) ON A
WIRELESS BASIS (LOW INCOME ONLY)**

By Order dated June 13, 2013 in this docket (“June 13 Order”), Telrite Corporation d/b/a Life Wireless (“Telrite” or the “Company”) was designated by the Washington Utilities and Transportation Commission (the “Commission”) as an Eligible Telecommunications Carrier (“ETC”) in portions of the State of Washington identified in Exhibit “B” to the Order (the “Service Area”). The Commission granted Telrite’s Amended Petition for ETC designation filed January 29, 2013, as supplemented on May 31, 2013. Telrite’s ETC designation is for the limited purpose of receiving federal low-income universal service support for prepaid wireless services, specifically Lifeline services. Telrite hereby submits this Petition for Renewal of its ETC designation (“Renewal Petition”) in its Service Area throughout the State of Washington.¹ In support of its petition, Telrite provides the following information:

¹ The June 13 Order required Telrite to file to renew its certification within one date of the order approving designation. Due to an administrative error, Telrite did not file by the date ordered. Immediately upon notice of its error, Telrite began to prepare this filing.

1. Telrite is a Georgia corporation with its principal offices located at 4113 Monticello Street, Covington, Georgia 30014. Telrite's Articles of Incorporation and Certificate of Authority to do Business in Washington were attached as Exhibit "B" to the Amended Petition for ETC designation filed with the Commission on January 29, 2013. A current Certificate of Authority to do Business in Washington is attached as Exhibit A.

2. Telrite has been designated as a wireless ETC in the states of Arizona, Arkansas, Colorado, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Missouri, Nevada, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Vermont, Washington, West Virginia, Wisconsin, Puerto Rico, and the U.S. Virgin Islands and has pending applications in California, Massachusetts, Mississippi, New Jersey, and South Dakota.

3. Correspondence or communications pertaining to this Renewal Petition should be directed to Telrite's attorneys of record:

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Portland, OR 97205
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E-mail: lisa@mcd-law.com

and:

Susan J. Berlin
Vice President Regulatory Affairs & Counsel
Telrite
14230 Lochridge Blvd., Ste. K
Covington, Georgia 30014
Telephone: (678) 202-0829
Cellular: (404) 956-6235
E-mail: susan.berlin@telrite.com

4. Questions concerning the ongoing operations of Telrite following certification should be directed to:

Susan J. Berlin
Vice President Regulatory Affairs & Counsel
Telrite
14230 Lochridge Blvd., Ste. K
Covington, Georgia 30014
Telephone: (678) 202-0829
Cellular: (404) 956-6235
E-mail: susan.berlin@telrite.com

5. In the Commission's June 13 Order, the Company was designated as an ETC for purposes of offering Lifeline services to qualifying low-income consumers in the State of Washington.

6. On July 1, 2013, as amended by filings made August 5, 2013, and August 8, 2013, Telrite submitted its compliance filing for approval of the Commission including Lifeline rate plans, terms, and conditions, proposed advertising language, and a customer application form. The compliance filing was subsequently approved by the Commission on August 13, 2013.

7. Telrite has provisioned Lifeline services to low-income consumers in its Service Area in the State of Washington since commencing operations in March 2014. As of the date of this Renewal Petition, the Company currently serves approximately 1340 consumers throughout the State of Washington.

8. As shown in the Commission's June 13, 2013 Order in this matter, the Commission has previously determined that Telrite meets the requirements for ETC designation by the Commission pursuant to 47 U.S.C. § 214(e)(2) and Washington Administrative Code ("WAC") § 480-123-030 through -040.

9. Telrite met with Commission staff on March 4, 2014 and September 10, 2014 to discuss its business plans for Washington State, to address any questions or concerns Staff wished to pose and to provide an overview of how Telrite conducts its business.

10. Telrite has met and will continue to meet the Washington State Conditions as set forth in Appendix “A” to the Commission’s Order. Specifically:

- As noted above, Telrite made a timely compliance filing for approval by the Commission containing the required items and approved by the Commission on August 13, 2013.
- Telrite maintains on file with the Commission its current rates, terms and conditions and has timely informed the Commission of any changes.
- Telrite provides a package of information to customers enrolling in its Lifeline service containing information about its rates, terms and conditions and links to its website.
- Telrite makes available to its Lifeline customers the choice of all other rates plans available to other customers.
- Telrite offers at least one plan with a minimum of 250 minutes per month.
- Telrite has checks and procedures in place to deactivate a Lifeline account if the customer has no usage for 60 consecutive days and timely notifies such customers in writing by mail about the potential activation and ways to avoid same. Telrite offers customers a 30 day grace period from the deactivation date to reactivate the Lifeline account by incurring usage and, in such instances, reinstates the minutes to which the customer was entitled from the grace period.
- Telrite timely files reports with the Commission on a quarterly basis providing the number of Lifeline customers it enrolls and deactivates each month and reasons for deactivations.
- Telrite timely responds to information requests from Commission Staff.
- Telrite cooperates with the Commission and the Department of Social and Health Services (DSHS) and has developed procedures for verifying Lifeline customers’ eligibility. Telrite has engaged in meetings with DSHS on the best ways to serve the public interest as well as on database access and usage.
- Telrite does not deduct airtime minutes for calls to customer care made from the customer’s handset by dialing 611 and makes this policy of free 611 calls explicit to customers.
- Telrite provides password protected data files to DSHS on a quarterly basis containing relevant subscriber data. In this manner DSHS is able audit Telrite’s Lifeline customers’ eligibility (including program eligibility and duplication with other Lifeline providers).
- Telrite provides the Commission with a copy of its annual Lifeline Verification survey results within 30 days of the date it files with USAC each year.
- Telrite files with the Commission, by March 31 of each year, a report on the Washington Lifeline customer number of complaints from the prior year,

organized by category and including complaints lodged with Telrite, the Commission, the Washington Attorney General, and the FCC.

- Telrite cooperates with the Washington State Enhanced 911 Program and PSAPs on E911 issues.
- Telrite is available to participate in Washington State's E911 Program "What's Your Location" public information campaign if the E911 Program requests the participation of wireless carriers.
- Telrite is familiar with the rules on cessation of business as specified in WAC 480-120-083 and is aware of the requirement to comply in the event of such cessation.
- Telrite collects and maintains necessary records and documentation to ensure its compliance with applicable FCC and Commission requirements and can make these available to Commission staff upon request.
- Telrite cooperates regarding phone number conservation issues and complies with 47 C.F.R. § 52.
- Telrite uses best efforts to comply with all applicable federal and state statutes and regulations.

11. In addition, Telrite hereby demonstrates as follows pursuant to the requirements of WAC § 480-123-030:

(a) Telrite seeks to serve and will continue to serve the Service Area identified in Appendix "B" to the Commission's Order;

(b) Telrite will continue to offer the services supported by federal universal service support mechanisms throughout the Service Area;

(c) Telrite will continue to provide each supported service in the State of Washington as follows:

- As an ETC in Washington, and consistent with state and federal policies favoring universal service, Telrite will offer voice telephony services as described in Section 47 C.F.R. § 54.101.
- Telrite will also provide access to emergency services provided by local government or public safety officials, including 911 and enhanced 911 ("E911") where available and will comply with any Department requirements regarding E911-compatible handsets. Telrite will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets. Telrite commits to pay in a timely manner all applicable federal, state and local regulatory fees, including but not limited to universal service and E911 fees.

- Telrite will not provide toll limitation service (“TLS”), which allows low-income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.
- Telrite will provide wireless service through resale. In its Lifeline Reform Order, the FCC decided to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC’s compliance with certain 911 requirements and the ETC’s filing with and approval by the FCC of a compliance plan describing the ETC’s adherence to certain protections prescribed by the FCC (“Blanket Forbearance”). On December 26, 2012, the FCC approved Telrite’s Compliance Plan and copy of Telrite’s FCC-approved Compliance Plan was filed as Exhibit “D” in the instant docket on January 3, 2013. Telrite continues to seek the same limited ETC designation in Washington to participate in the Lifeline program.
- Telrite, in its provision of wireless services, will offer resold services which Telrite will obtain from its underlying wireless provider, AT&T. This extended footprint allows Telrite to provide expanded coverage throughout otherwise underserved markets.
- Telrite has developed and implemented a diverse network that delivers all of the services required by the federal Lifeline guidelines, and employs AT&T to ensure ubiquitous coverage.
- As demonstrated above, through its service arrangements Telrite is able to offer all of the services and functionalities supported by the federal universal service program throughout its Service Area.

(d) WAC § 480-123-030(1)(d) requires petitions for ETC designation to include a substantive plan of the investments to be made with initial federal support during the first two years in which support is received. This requirement applies to carriers that seek high-cost support to fund investments to their networks. Telrite is requesting renewed ETC designation in Washington solely for the purpose of participating in the Lifeline program as a prepaid wireless carrier. It is not seeking designation for the purpose of

participating in the USF's high-cost program. Based on the foregoing, Telrite has no basis for filing an investment plan and should continue to be exempt from WAC § 480-123-030(1)(d).

(e) Telrite will continue to advertise the availability of Lifeline services supported by federal universal service mechanisms in a way that is reasonably calculated to reach low-income consumers not receiving discounts. Since commencing operations in Washington in March 2014 Telrite has utilized and will continue to utilize the following types of advertisements: Community Outreach, Site Events: Live Enrollments, FCC and State Compliant Banners and Signs, Website directs potential customers to sign up locations, and regional newspaper advertisements (see Exhibit B, Telrite's Advertising and Marketing Plan).

(f) WAC § 480-123-030(1)(f) requires petitions for ETC designation to include a map in .shp format of proposed service areas (exchanges) with existing and planned locations of cell sites and shading to indicate where the carrier provides and plans to provide commercial mobile radio service signals. Telrite does not own, control, nor plan to develop cell sites. Telrite's Service Area encompasses all of the areas for which it was approved in Exhibit B of the Commission's June 13 Order. As Telrite does not have access to the underlying carriers' maps of geographic service areas showing the location of cell sites, Telrite respectfully requests a waiver of the requirement under WAC § 480-123-130(1)(f) to provide coverage maps. (g) Information that demonstrates its ability to remain functional in emergency situations including a description of how it complies with WAC 480-120-411 or, for a wireless carrier, information that demonstrates it has at least four hours of back up battery power at each cell site, back up generators at each

microwave hub, and at least five hours back up battery power and back up generators at each switch; and

(g) WAC § 480-123-030(1)(g) requires petitions for ETC designation on a wireless basis to include information that demonstrates its ability to remain functional in emergency situations including information that demonstrates it has at least four hours of back up battery power at each cell site, back up generators at each microwave hub, and at least five hours back up battery power and back up generators at each switch. Telrite resells facilities owned by AT&T in the State of Washington and, therefore, relies on the facilities of AT&T for backup battery power at each cell site, backup generators at each microwave hub, and backup battery and generators at each switch located in Washington. For these reasons, Telrite respectfully requests a waiver of the requirements of WAC § 480-123-030(1)(g) given that AT&T maintains the appropriate level of backup power at each such site in Washington.

12. Telrite's enrollment process is as follows: Every prospective Lifeline customer is certified during the enrollment process. The goals of the certification process are to properly confirm eligibility, and to ensure that no one in the prospective customer's household is currently receiving Lifeline service. In short, Telrite confirms prospective customer's identity by reviewing government-issued photo ID, confirms that the prospective customer is eligible for Lifeline under program eligibility or income eligibility, that he or she provides a valid household address, and that no one in the household is currently receiving a Lifeline subsidy. In the State of Washington, a database maintained by the Department of Health and Human Services is checked to verify eligibility if a customer is attempting to qualify for service through SNAP, TANF, SSI, or Medicaid.

Telrite acquires the following information from prospective customers: name, home address, the government assistance program(s) in which prospective customer is currently enrolled, signature, date, social security number and date of birth.

All prospective customers must answer and attest to the following questions:

- Is anyone in your household currently receiving a Lifeline subsidy from any other Lifeline service provider, such as Safelink, Assurance, or Reachout Wireless? (If “yes, the prospective customer cannot receive service.)
- I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required.
- I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.
- I am not listed as a dependent on another person’s tax return (unless over the age of 60).
- The address listed below is my primary residence, not a second home or business.
- If I move to a new address, I will provide that new address to the Company; I will verify my temporary residential address every 90 days.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de- enrollment and the termination of my Lifeline benefits.

13. Renewal of Telrite’s ETC designation will continue to promote the public interest in the State of Washington for the reasons as previously set forth in its Initial Petition for ETC designation.

WHEREFORE, premises considered, having demonstrated herein that Telrite satisfies all the conditions of eligibility necessary for continuing designation as an ETC in Washington, and having shown that the public and universal service interests of the telecommunications consumers of the State of Washington will be properly served, Telrite respectfully requests that

the Commission promptly grant this Renewal Petition, grant the waivers requested and renew the designation of Telrite Corporation d/b/a Life Wireless as a wireless eligible telecommunications carrier in its Service Area throughout the State of Washington.

Respectfully Submitted,

By: 

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Attorneys for Telrite Corporation d/b/a Life
Wireless

State of Georgia)

County of Newton)

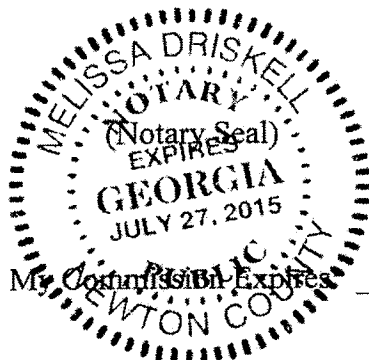
Certification

Kelly Jesel, who first being duly sworn, deposes and states that she is the CFO of Telrite Corporation, Applicant in this application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of her knowledge and belief.

Date: 9.23.2014

Kelly Jesel
Kelly Jesel, CFO

Subscribed and sworn to before me, a Notary Public, this 23 day of September, 2014.



Melissa Driskell
(Signature of person authorized to administer oath)

7/27/15

Exhibit A

Certificate of Authority to do Business in Washington

Corporations Division - Registration Data Search

TELRITE CORPORATION

Purchase Documents for this Corporation » (<http://www.sos.wa.gov/corps/OrderDocs.aspx?ubi=602294685>)

UBI Number	602294685
Category	REG
Profit/Nonprofit	Profit
Active/Inactive	Active
State Of Incorporation	GA
WA Filing Date	05/05/2003
Expiration Date	05/31/2015
Inactive Date	
Duration	Perpetual
Registered Agent Information	
Agent Name	CORPORATION SERVICE COMPANY
Address	300 DESCHUTES WAY SW SUITE 304
City	TUMWATER
State	WA
ZIP	98501
Special Address Information	
Address	
City	
State	
Zip	

Governing Persons

Title	Name	Address
President,Chairman ,Director	LISLE , BRIAN	4113 MONTICELLO STREET COVINGTON , GA 30014
Secretary,Director	GEOFFROY , MICHAEL	4113 MONTICELLO STREET COVINGTON , GA 30014

Vice President, Director	RATHMAN , BRIAN	4113 MONTICELLO STREET COVINGTON , GA 30014
Treasurer	JESEL , KELLY	4113 MONTICELLO STREET COVINGTON , GA 30014

[Purchase Documents for this Corporation Â» \(http://www.sos.wa.gov/corps/OrderDocs.aspx?ubi=602294685\)](http://www.sos.wa.gov/corps/OrderDocs.aspx?ubi=602294685)

Contribute a better translation

Exhibit B
Telrite Corporation
Washington Advertising and Marketing Plan

Telrite Corporation

Washington Advertising and Marketing Plan

Version 1.3 – Revised June 28, 2013

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Telrite advertises Lifeline services under the d/b/a “Life Wireless”. Life Wireless advertises the availability of, and the prevailing prices for, the universal services throughout the area in which they have been designated an ETC. Life Wireless complies with the requirements regarding advertisement as required by the FCC and USAC. Life Wireless continually reviews the success and effectiveness of their outreach materials and methods. Accordingly, more low-income Washington residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to Life Wirelesses’ service. Life Wireless engages in models of marketing and advertising through the following one on one outreach and enrollment methods:

- Community Outreach
- Site Events: Live Enrollments
- FCC and State Compliant Banners and Signs
- Website directs potential customers to sign up locations

Community Outreach

Community Outreach represents more than 99 percent of Life Wirelesses’ customer enrollment that is done in-person, as opposed to over the phone or the Internet. Event locations are scheduled using various market or industry data resources. Life Wireless directs a team of representatives that survey and evaluate potential event locations across its service areas. Additionally, Life Wireless partners with community organizations and governmental agencies that administer any of the relevant government assistance programs such as:

- Social Service Agencies
- Tribal Organizations
- Community Centers
- Nursing Homes
- Churches
- Food Banks

Please see **Exhibit “A”** - Life Wireless poster

Site Events

All Site Events are required to meet the following uniform standards:

- (1) 10’x10’ Custom Printed Tent with frame
- (1) 6’ Custom Printed Fitted Table Cover
- (1) A-frame with (2) 2x3 Custom Printed Inserts
- (1) FCC Required Sign
- (1 each-per table) Laminated State Lifeline Form, State-specific signs as required

Please see **Exhibit “B”** – Site Event Photo

FCC and State Compliant Banners and Signs

All Banners and Signs inform consumers in clear, easily understood language:

- that the offering is a Lifeline-supported service;
- that only eligible consumers may enroll in the program;
- what documentation is necessary for enrollment;
- that the program is limited to one benefit per household, wireline or wireless; and that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or barred from the program.

For all marketing materials, we use the following verbiage:

Verbiage in LARGE PRINT:

- “Life Wireless is a Lifeline supported service, a government assistance program.”
- “Only eligible customers may enroll in the program.”
- “Forms of documentation necessary for enrollment are listed below.”
- “Service is limited to one discount per household, consisting of either wireline or wireless service.”
- “Telrite is an Eligible Communications Carrier (ETC), doing business as Life Wireless.”
- “IMPORTANT: consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.”

Verbiage in FINE PRINT:

“Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household’s participation in one of the federal assistance programs. 1 – current or prior year’s statement of benefits from a qualifying state, federal or Tribal program. 2 – a notice letter of participation in a qualifying state, federal or Tribal program. 3 – program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof). 4 – other official document evidencing the consumer’s participation in a qualifying state, federal or Tribal program. Income eligibility: Prior Year’s state, federal, or Tribal tax return, current income statement from an employer or paycheck, Social Security statement of benefits, Veterans Administration statement of benefits, Retirement/pension statement of benefits, Unemployment/Workmen’s comp statement of benefits. Federal or Tribal notice letter of participation in Divorce decree, child support award, or other official document containing income information for at least three (3) months time. Life Wireless will NOT retain a copy of this documentation.”

Please see **Exhibit “C”**

Website

www.lifewireless.com is the company website where customers can:

- Learn about the Lifeline program
- Learn how to sign up
- Request a Site Event
- Contact Customer Service
- Sign into their account
- See phones and rates
- Add minutes to their account

Life Wireless prominently displays on the:

- Home Page
 - A scrolling banner reading “For rates, comments and concerns, click here and select your state”. Please see **Exhibit “D” – 2 of 2** for the page to which the customer is directed.
 - Life Wireless™ is a Lifeline supported program that provides free cellular service each month for eligible customers. Life Wireless™ also provides plans for people who do not qualify for assistance. Life Wireless™ offers:
 - Voicemail
 - Text Messaging
 - Call Waiting
 - Three-way calling
 - Call Forwarding
 - Caller ID service
 - No roaming charge
 - No charge for domestic long distance calls
 - Nationwide Calling
 - Rollover Minutes*
 - Affordable Recharge Plans

Lifeline is a government assistance program. Only eligible consumers may enroll in the program and documentation is necessary. Lifeline service is non-transferable.

Telrite Corporation d/b/a Life Wireless is an Eligible Telecommunications Carrier (ETC).

Lifeline benefits are limited to a single line of service per household. You may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both.

- Our Mission Statement

Please see **Exhibit “D” – 1 of 2**

- About Lifeline Page
 - Low Income Assistance
 - Low Income telephone assistance provides a discount on a subscriber's monthly bill and/or a reduction to the customary charge to commence service (activation fees). Eligibility is based on income or participation in assistance programs related to income.
In general, if a subscriber participates in any of the following programs, they are qualified for low-income telephone assistance.
 - (1) Temporary Assistance to needy Families (TANF)
 - (2) Supplemental Security Income (SSI)
 - (3) Food Stamps
 - (4) Medicaid
 - (5) Federal Public Housing Assistance (FPHA)
 - (6) Low-Income Home Energy Assistance Program (LIHEAP)
 - (7) or an income that is at or below 135% of Federal Poverty Guidelines
 - WHAT IS LIFELINE SUPPORT?

Lifeline support lowers the cost of basic, monthly local telephone service. An eligible customer may receive the Lifeline discount on either a wireline or wireless connection, but the discount is available for only one telephone connection per household. Lifeline does not apply to taxes, surcharges, and mileage charges.

To learn more about the Lifeline Program, please visit these links:

 - [Universal Service Administrative Company: Lifeline](#)
 - [Federal Communications Commission](#)
 - [FCC Encyclopedia: Lifeline Public Service Announcements](#)
 - CTIA Consumer Code for Wireless Service
 - The CTIA (Cellular Telecommunications Industry Association) and select wireless carriers have developed the following Consumer Code. Life Wireless has voluntarily adopted the principles, disclosures, and practices for wireless service provided to individual consumers. These principles are:
 - (1) DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS
 - (2) MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE
 - (3) PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE
 - (4) ALLOW A TRIAL PERIOD FOR NEW SERVICE
 - (5) PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

- (6) SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS
- (7) PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS
- (8) PROVIDE READY ACCESS TO CUSTOMER SERVICE
- (9) PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES
- (10) ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Please see **Exhibit "E"**

Life Wireless is currently developing a webpage template for the Representatives that would like to have a website with their direct contact information.

Television

Life Wireless has aired three separate PSA's on broadcast television educating residents on the Lifeline program.

Life Wireless is stressing the rules for obtaining wireless service aid with a new public service announcement, the third issued this year by Life Wireless.

The educational TV spot, circulated on the eve of Lifeline Awareness Week, September 10-16, explains that:

- Lifeline is a government benefit providing discounts on monthly telephone service for eligible low-income consumers.
- Eligible customers may receive a discount on either a landline or a wireless service, but not both, with a limit of one benefit per household.
- Consumers violating the one-per-household rule may be subject to criminal and/ or civil penalties.

The PSA's can be viewed by selecting the following the following links:

<http://www.youtube.com/watch?v=7xOCEZvTv9o&feature=youtu.be>

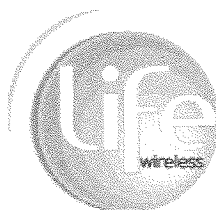
<http://youtu.be/CwO5p-RgVhE>

<http://youtu.be/jXVxbh6Y1dE>

Rate Plans – Please see Exhibit "F"

Exhibit "A"


FREE
PHONE



WITH FREE
MONTHLY
SERVICE!

Life Wireless is a Lifeline supported service, a government assistance program. Only eligible customers may enroll in the program. See if you qualify for a free phone with free monthly service! Service is limited to one discount per household, consisting of either wireline or wireless service. Forms of documentation necessary for enrollment are listed below. Service is non-transferable.

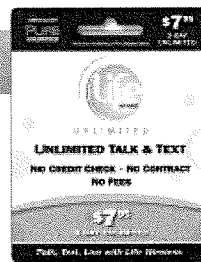
Life Wireless Features:

- Voicemail
 - Text Messaging
 - Call Waiting
 - Three-way calling
 - Call Forwarding
 - Caller ID service
- 
- No roaming charge
 - No charge for domestic long distance calls
 - Nationwide Calling
 - Rollover Minutes
 - Affordable Recharge Plans

IMPORTANT: consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

Need more minutes?

As Low As **\$7.95**



1 Week Unlimited Talk & Text	2 Week Unlimited Talk & Text	1 Month Unlimited Talk & Text
\$12.95	\$19.95	\$29.95

\$5 and \$10 Recharge Cards Also Available!

Many Calling Plans Available
(plans vary by State)

Contact our Customer Service Dept to check for the plans in your State

1-888-543-3620



Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on: (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs: 1 - current or prior year's statement of benefits from a qualifying state, federal or Tribal program, 2 - a notice letter of participation in a qualifying state, federal or Tribal program, 3 - program participation documents (eg. current SNAP card, Medicaid card, or copy thereof), 4 - other official

Exhibit "B"



Exhibit "C"

ATTENTION CUSTOMERS

- **Only ONE (1) Lifeline supported service is allowed per household.**
- **Customers must present Photo ID and Proof of Benefit to obtain service.**
- **Contact 1-866-477-5011 to report any fraud involving the Lifeline Program.**

Life Wireless is a Lifeline supported service, a government assistance program. Only eligible customers may enroll in the program. See if you qualify for a free phone with free monthly service! Service is limited to one discount per household, consisting of either wireline or wireless service. Forms of documentation necessary for enrollment are listed below. Service is non-transferable.

IMPORTANT: consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs. 1 -current or prior year's statement of benefits from a qualifying state, federal or Tribal program. 2 - a notice letter of participation in a qualifying state, federal or Tribal program. 3 - program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof). 4 - other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program. Income eligibility: Prior Year's state, federal or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment/ Worker's comp statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months time. Life Wireless will NOT retain a copy of this documentation.

Telrite Corporation is an Eligible Telecommunications Carrier (ETC), doing business as Life Wireless.

Exhibit "D" – 1 of 2

Customer Login | Representative Login | Customer Service | Check Coverage ▼ 112 22

For rates, comments and concerns, click here

Talk, Text, Live with Life Wireless.

Click here to check your eligibility for
Lifeline supported wireless service.

About Lifeline
Phones & Rates
Sign Up Today
Add Minutes

Visit Our
Media
Press Room

CLICK HERE

Life Wireless™ is a Lifeline supported program that provides free cellular service each month for eligible customers. Life Wireless™ also provides plans for people who do not qualify for assistance. Life Wireless™ offers:

NEW

UNLIMITED
TALK & TEXT

for
\$29.95

Learn More

- Voicemail
- Text Messaging
- Call Waiting
- Call Forwarding
- Caller ID service
- Three-way calling
- No roaming charge
- No charge for domestic long distance calls
- Nationwide Calling
- Affordable Recharge Plans
- Rollover Minutes*

Request a
Life Wireless Event
at Your Location

CLICK HERE

Lifeline is a government assistance program. Only eligible consumers may enroll in the program and documentation is necessary. Lifeline service is non-transferable.

Telrite Corporation d/b/a Life Wireless is an Eligible Telecommunications Carrier (ETC).

Lifeline benefits are limited to a single line of service per household. You may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both.

Explore Life Wireless™ or [click here](#) to get started.

* Not all plans include Rollover Service.


OUR MISSION STATEMENT

Life Wireless's mission is to drive awareness and availability of the Lifeline program to under-served markets across the United States.

We are committed to being the industry-standard for compliance, and will continue to strive to prevent, detect and eliminate waste, fraud, and abuse.

Exhibit "E"

Exhibit "D" – 2 of 2



Customer Login | Representative Login | Customer Service |

[About Lifeline](#) | [Phones & Rates](#) | [Sign Up Today](#) | [Add Minutes](#)

Phones & Rates

[Handsets](#) | **[Program Rates](#)** | [Refill](#) | [International](#)

Life Wireless

Select your state of residence to check our programs:

State:

Eligibility	Non-Recurring Phone Fee	Non-Recurring Activation Fee	Monthly Airtime Fee	Monthly Minutes	Text Rate	Rollover
Lifeline eligible	\$0.00	\$0.00	\$0.00	125	1/3 minute	Yes
Non-Lifeline eligible	\$20.00	\$0.00	\$12.75	125	1/3 minute	Yes
Lifeline eligible	\$0.00	\$0.00	\$0.00	250	1/3 minute	No
Non-Lifeline eligible	\$20.00	\$0.00	\$12.75	250	1/3 minute	No


Complaints concerning Lifeline Service can be directed to:

Washington State Office of the Attorney General

Address
800 5th Ave. Suite 2000 Seattle, WA. 98104-3188

Phone
1.800.551.4636 (in Washington only)
206.464.6684
1.800.833.6388 (Washington State Relay Service for the hearing impaired)

Website
www.atg.wa.gov



Customer Login | Representative Login | Customer Service | Check Coverage ▾ ZIP: GO

[About Lifeline](#) | [Phones & Rates](#) | [Sign Up Today](#) | [Add Minutes](#)


OUR MISSION STATEMENT

Life Wireless's mission is to drive awareness and availability of the Lifeline program to under-served markets across the United States.

We are committed to being the industry-standard for compliance, and will continue to strive to prevent, detect and eliminate waste, fraud, and abuse.

About Us

LIFE WIRELESS™ is a Lifeline supported wireless service provided by TELRITE CORPORATION. LIFE WIRELESS™ offers a Lifeline discount to low income families and individuals for wireless services. To obtain LIFE WIRELESS™ service potential subscribers must meet certain eligibility requirements such as receiving governmental assistance or a household income that is 135% or below the federal poverty level. The specifics of what determines a potential subscriber's eligibility are specific to each state. LIFE WIRELESS™ service is limited to one per household, and cannot be combined with any other Lifeline offering.



[Visit Our Media Press Room](#)

Lifeline is a government assistance program. Only eligible consumers may enroll in the program and documentation is necessary. Lifeline service is non-transferable.

Telrite Corporation d/b/a Life Wireless is an Eligible Telecommunications Carrier (ETC).

LOW-INCOME ASSISTANCE

Low Income telephone assistance provides a discount on a subscriber's monthly bill. Eligibility is based on income or participation in assistance programs related to income.

In general, if a subscriber participates in any of the following programs, they are qualified for low-income telephone assistance.

1. Temporary Assistance to needy Families (TANF)
2. Supplemental Security Income (SSI)
3. Food Stamps
4. Medicaid
5. National Free School Lunch Program
6. Federal Public Housing Assistance (FPHA)
7. Low-Income Home Energy Assistance Program (LIHEAP)

or an income that is at or below 135% of Federal Poverty Guidelines

In addition, residents of Federally-recognized Tribal lands may qualify under the following programs:

1. Food Distribution Program on Indian Reservations
2. Bureau of Indian Affairs General Assistance
3. Tribally Administered TANF
4. Head Start (meeting income-qualifying standards)

WHAT IS LIFELINE SUPPORT?

Lifeline support lowers the cost of basic, monthly local telephone service. An eligible customer may receive the Lifeline discount on either a wireline or wireless connection, but the discount is available for only one telephone connection per household. Lifeline does not apply to taxes, surcharges, and mileage charges.

To learn more about the LifeLine Program, please visit these links:

- [Universal Service Administrative Company: Lifeline](#)
- [Federal Communications Commission](#)
- [FCC Encyclopedia: Lifeline Public Service Announcements](#)

CTIA CONSUMER CODE FOR WIRELESS SERVICE

The CTIA (Cellular Telecommunications Industry Association) and select wireless carriers have developed the following Consumer Code. Life Wireless has voluntarily adopted the principles, disclosures, and practices for wireless service provided to individual consumers. These principles are:

1. DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS
2. MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE
3. PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE
4. ALLOW A TRIAL PERIOD FOR NEW SERVICE
5. PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING
6. SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS
7. PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS
8. PROVIDE READY ACCESS TO CUSTOMER SERVICE
9. PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES
10. ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

JOIN THE LIFE WIRELESS TEAM

To learn about job opportunities please forward a cover letter and resume to:
careers@lifewireless.com

Telrite will provide qualified Lifeline customers in Washington with their choice of 125 or 250 anytime prepaid minutes per month at no charge. Minutes do not expire for 125 minute plan and unused minutes are rolled over to the next month. Unused minutes for the 250 minute plan do not roll over. Text messaging is available at the rate of:

- (a) 125 Minute Plan with rollover and 3 SMS per voice minute; and
- (b) 250 Minute Plan without rollover and 3 SMS per voice minute.

Lifeline customers can purchase additional bundles of minutes in denominations of \$5.00, \$10.00, \$4.95, \$7.95, \$12.95, \$19.95 and \$29.95.⁴³ Airtime, when used for standard cellular calls, is valued at and will be decremented at the following rates:

- (a) \$5.00 denomination – 60 minutes (\$0.083 per minute) of use;
- (b) \$10.00 denomination – 130 minutes (\$0.077 per minute) of use;
- (c) \$4.95 denomination – 1 day Unlimited Talk and SMS;
- I (d) \$7.95 denomination - 3 day Unlimited Talk and SMS;
- (e) \$12.95 denomination – 7 Day Unlimited Talk and SMS;
- (f) \$19.95 denomination – 14 Day Unlimited Talk and SMS;
- (g) \$29.95 denomination – 30 Day Unlimited Talk and SMS

CERTIFICATE OF SERVICE

I hereby certify that I have this 24th day of September, 2014, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via Overnight and electronic mail, properly addressed as follows:

Steven V. King
Acting Secretary and Executive Director
Washington Utilities and Transportation
Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Hand Delivered
 U.S. Mail (first-class, postage
prepaid)
 Overnight Mail (UPS)
 Facsimile (360) 586-8203
 Email (records@wutc.wa.gov)



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