

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PREPAID WIRELESS GROUP, LLC

**FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER ON A
WIRELESS BASIS (LOW INCOME ONLY)**

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FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER ON A
WIRELESS BASIS (LOW INCOME ONLY)**

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I. INTRODUCTION

Prepaid Wireless Group, LLC (“PWG” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Washington Utilities and Transportation Commission (“Commission”), including Section 480-123-030 of the Washington Administrative Code (“WAC”), hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Washington (“Petition”).

PWG seeks ETC designation to participate in the federal Universal Service Fund (“USF”) solely to provide Lifeline service to qualifying Washington consumers; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or high cost program.³ As demonstrated herein, and as certified in Exhibit 1 attached hereto, PWG meets all the statutory and regulatory requirements for designation as an ETC in the State of Washington, including the requirements outlined in the FCC’s *Lifeline and*

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that the Company only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

Link Up Reform Order,⁴ *Lifeline Modernization Order*,⁵ and *Fifth Report and Order*.⁶

Furthermore, PWG is positioned to reach unserved and underserved Lifeline-eligible consumers. Rapid grant of PWG's request, therefore, would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array of low-income Washington residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Petition should be addressed to:

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⁴ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*" or "*Lifeline Modernization Order*").

⁶ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, "*Fifth Report and Order*").

II. COMPANY OVERVIEW

Prepaid Wireless Group, LLC is a Maryland limited liability company,⁷ with its principal office located at 6100 Executive Boulevard, Suite 202, Rockville, Maryland 20852. PWG is authorized to provide business as a foreign limited liability company in the State of Washington. See Exhibit 2 which is attached hereto. PWG was granted ETC designation as a facilities-based provider in New York, and has an applications pending in Florida, Washington and Wisconsin for such designation.

PWG is one of the nation's longest standing aggregators of wireless services. PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. PWG provides integrated communications solutions - including Mobile Virtual Network Operator ("MVNO") enablement, cellular carrier access aggregation, voice/text/data services, machine-to-machine ("M2M"), and Internet of Things ("IoT") connectivity. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the Lifeline consortium to lobby for favorable rules and regulations that promote longevity and stability of the program.

In addition to being a facilities-based provider of wireless telecommunications services, PWG is a provider of commercial mobile radio service ("CMRS") and provides prepaid wireless telecommunications services to consumers by using its own facilities, as well as access to the wireless network of T-Mobile on a wholesale basis.

With support from the FCC Lifeline Program's subsidies, PWG will be able to access federal funds to provide broadband access to low-income Washington residents and will be able to discount its phone plans to affordable levels for public housing residents, the homeless, students, the elderly, and Washington residents that are in desperate need of broadband access. PWG's

⁷ Prepaid Wireless Group, LLC was organized in the State of Maryland on June 29, 2012.

service offerings include prepaid mobile phone service, high-speed broadband, SMS, and high-quality customer service.

PWG will provide affordable prepaid mobile phone service and high-quality customer service. PWG's service offering will include: (1) local and long distance calling; (2) access to the following custom calling features at no charge: (a) Caller ID; (b) Call Waiting; (c) Call Forwarding; (d) 3-Way Calling; and (e) Voicemail; (3) text messaging; (4) broadband access; and (5) the option for a consumer to "bring their own device". PWG may provide user-friendly handsets or hotspot devices. PWG's products and plans will be specially geared toward serving lower income communities. The Company will not require service contracts from its customers, and it will always ensure competitively low pricing for its services and products. PWG will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and customer service. The Company's prepaid, budget-friendly pricing will give many low-income consumers the option of having mobile phone service and broadband access without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their PWG service to suit their needs with PWG's available bundles of minutes, broadband data, and text packages to supplement their monthly plan.

PWG's Lifeline customers will be low-income consumer households that will depend on, and benefit greatly from, PWG's inexpensive and flexible pricing plans. PWG will not impose credit checks, nor will it require any deposits or contractual commitments. Many of PWG's customers likely will turn to PWG because they cannot afford the postpaid services provided by traditional wireless carriers. PWG will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, PWG will

contribute to the expansion of mobile wireless and broadband services for low-income consumers in Washington.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.⁸ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.⁹ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1).

PWG therefore requests that the Commission expeditiously process the instant Petition so that PWG can quickly begin expanding the availability of affordable Lifeline-supported wireless services to qualifying low-income customers in Washington.

PWG recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC’s Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier’s services. Similarly, Section 160.13(1) of the Commission’s rules states the Commission may designate carriers as ETCs. Section 160.13(2)(b) describes the requirements for federal-only ETC designation. Specifically, an applicant for federal-only ETC designation “is required to meet all of the applicable federal eligibility

⁸ 47 U.S.C. § 214(e)(2).

⁹ *USF Order*, at 8858–59, ¶ 145.

requirements in 47 CFR 54.201 and 54.202, and any state requirements or processes that federal law requires ETCs to follow.”

PWG does utilize its own facilities, in combination with T-Mobile facilities, to provide service. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant PWG’s request for designation as an ETC throughout the State of Washington.

IV. PWG SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201

Section 254(e) of the Act provides that, “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹⁰ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services. . Applicants also must commit to advertise the availability and rates of such services.¹¹ As detailed below, PWG satisfies each of the above-listed requirements.

¹⁰ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“*USF Order*”).

¹¹ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

A. PWG Will Provide Service Consistent with the FCC’s Section 214’s Facilities Requirements

Section 214 requires ETCs to provide services using their facilities, at least in part, and PWG uses its own facilities in part to provide service.

B. PWG Is a Common Carrier

CMRS providers like PWG are treated as common carriers.¹²

C. PWG Will Provide All Supported Services

PWG is able to provide all of the supported services required by Section 54.101(a) of the FCC’s Rules (47 C.F.R. § 54.101(a)) as follows:

1. Voice Telephony Service

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

Voice Grade Access to the Public Switched Telephone Network. PWG provides voice grade access to the public switched telephone network (“PSTN”) through its own facilities and those of its Underlying Carrier.

Local Usage at No Additional Charge. PWG offers rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. PWG provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of

¹² *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory “mobile services” category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) (“mobile services” providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) (“We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services.*”) (emphasis added).

service activation status or availability of minutes. PWG also complies with the FCC’s regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.¹³ “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”¹⁴ Nonetheless, PWG’s offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. PWG’s service, moreover, is not offered on a distance-sensitive basis and local and domestic long-distance minutes are treated the same.

2. Broadband Internet Access Services

PWG provides Broadband Internet access service (“BIAS”) to ensure its Lifeline customers receive full Lifeline support. The FCC has stated that BIAS consists of the ability for a user to receive “the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service.”¹⁵ PWG provides BIAS to low-income consumers via its own facilities and resale of its Underlying Carrier’s services.

D. PWG Requests Designation Throughout Its Service Area

PWG is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, PWG is required to describe the geographic area(s) within which it requests designation as an ETC. PWG requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever PWG or its underlying, facilities-based

¹³ See *Lifeline and Link Up Reform Order* at ¶ 367.

¹⁴ See *id.* at ¶ 49.

¹⁵ See 47 C.F.R. § 8.2(a).

provider(s) have wireless coverage, including federally-recognized tribal lands.¹⁶ The Company's proposed ETC service area, identified by exchange, is attached hereto as Exhibit 3. PWG understands that its service area overlaps with rural carriers in Washington but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. PWG is not seeking Link-Up or high-cost support.

Therefore, designation of PWG as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that "[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."¹⁷ While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the "service area conformance" requirement), the FCC's *Lifeline and Link Up Reform Memorandum Opinion and Order* (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.¹⁸ In light of this forbearance, the Commission has the authority to designate ETCs such as PWG in rural areas without concern for the service area conformance requirement.¹⁹

¹⁶ The Company requests that the Commission expressly indicate in the ETC designation order that such designation includes federally recognized tribal lands.

¹⁷ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

¹⁸ See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

¹⁹ See 47 C.F.R. § 54.207(c).

E. PWG Will Advertise the Availability of Supported Services

PWG will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). PWG will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, PWG's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) PWG is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and that 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. Additionally, PWG will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

PWG will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as the Internet, mass media, outreach events, and community and charitable involvement. PWG may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

V. PWG SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)

PWG hereby provides the additional information and certifications required for carriers seeking ETC designation as set forth in 47 C.F.R. § 54.202(a).

A. Service Commitment Throughout the Proposed Designated Service Area

PWG will provide service in Washington by utilizing its own facilities and reselling service which it obtains from its Underlying Carrier. T-Mobile's network is operational and largely built out. Thus, PWG will be able to commence offering its Lifeline service to all locations served by T-Mobile very soon after receiving approval from the Commission. Upon receiving ETC designation from the Commission, PWG will immediately apply for a study area code (SAC) from USAC, and will begin offering services upon issuance of the SAC.

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the certification attached in Exhibit 1, PWG commits to comply with the service requirements applicable to the low-income support that it receives, including the rules set forth in the FCC's *Fifth Report and Order*. Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. § 54.202(a)(2), PWG has the ability to remain functional in emergency situations, including at least four hours of backup battery power at each T-Mobile cell site, backup generators at each microwave hub, and at least five hours of backup battery power and backup generators at each switch. As discussed, PWG will utilize its own facilities in addition to the extensive and well-established T-Mobile network and facilities to provide its Lifeline services. The Company understands that T-Mobile and its own network has access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to

reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations.

C. Commitment to Consumer Protection and Service Quality

In accordance with 47 C.F.R. § 54.202(a)(3), an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service. PWG hereby commits to comply with the CTIA Consumer Code for Wireless Service. See Exhibit 7 which is attached hereto.

PWG’s customer service is available Monday through Saturday from 8:00AM to 10:00PM EST via phone (611 or toll-free 800-544-4441) and Monday through Saturday from 8:00AM to 9:30PM EST via online chat. Subscribers can also initiate support tickets 24 hours a day 7 days a week via an online chat and customer service representatives respond during the above-mentioned support hours. PWG will cooperate fully with the Commission to resolve all consumer complaints.

The Company contact for customer complaints and for the Commission for state lifeline reporting is:

Peter Einisman
Compliance Analyst
Compliance@PWGwireless.com
678.741.6253

D. PWG is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), PWG is financially and technically capable of providing Lifeline-supported services. PWG has never filed for any form of bankruptcy relief. The Company generates revenues from non-Lifeline services; consequently, PWG has not relied (and does not intend to rely) exclusively on Lifeline reimbursement for the Company’s operating

revenues. In the event USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. In addition, PWG's financial and technical capabilities to provide service are demonstrated by its performance of approximately 12 years in the provision of network services and devices to the Lifeline industry, the ACP industry, and other wireless providers, with consistently strong service, growth. The Company has not been subject to any FCC or USAC enforcement actions related to the Low Income Fund or ETC revocation proceedings in any state.

Furthermore, the senior management of PWG has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to PWG.²⁰ PWG will be providing some resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carrier.

E. Terms and Conditions of Proposed Lifeline Offering

PWG has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout Washington. PWG intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and broadband usage. PWG commits that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. PWG'S Lifeline-supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward. To the extent PWG provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and PWG

²⁰ See Exhibit 5 for key management bios.

will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 6 is a summary table of the Company's proposed Lifeline service offerings. Customers will be able to purchase additional minutes or data as needed. All plans will include nationwide domestic long-distance at no extra per-minute charge, and PWG will not assess any usage for access to its free customer services (611). Emergency (911) calls will be free, regardless of service activation or availability of minutes, and will not count against the customer's airtime. The Company's Lifeline offering will provide feature-rich mobile connectivity for qualifying subscribers without the burden of credit checks or service contracts. PWG's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

F. PWG Will Comply with Lifeline Certification and Verification Requirements

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. Customers must then apply directly through the National Lifeline Eligibility Verifier ("National Verifier"), which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier's or Company's website) or request that a copy be mailed to them. PWG utilizes the standard Lifeline application forms as required by FCC rules, and thus complies with the disclosure and information collection

requirements in 47 C.F.R. § 54.410(d).²¹ PWG will certify and verify initial and continued consumer eligibility in accordance with 47 C.F.R. § 54.410, and will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. PWG further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers' applications and determination of eligibility will be performed by the National Verifier.

G. Prevention of Waste, Fraud and Abuse

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. PWG will rely on the National Verifier to determine initial and ongoing eligibility of Washington Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database (“NLAD”) for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from PWG or any other ETC, and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service. PWG thus complies with the requirements of section 54.404 of the FCC’s rules. In addition, Company personnel emphasize the “one Lifeline service per household” restriction in their direct sales contacts with potential customers.

²¹ *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, “Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program,” DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC’s website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), PWG will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, PWG contracts with a third party Lifeline service bureau, currently CGM, LLC, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company 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, PWG ensures that it does not over-request from support funds.

H. PWG Will Comply with Reporting Requirements

PWG will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e., FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e., FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs.

I. PWG Will Comply With Regulations Imposed By The Commission

By this Petition, PWG hereby asserts its willingness and ability to comply with the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. Upon Commission request, PWG is prepared to answer questions or present additional testimony or other evidence about its services within the state. PWG commits that 100% of federal universal service funds will flow through directly to Lifeline customers.

PWG will 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. PWG will also 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, and is willing to 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 PWG's proprietary software and technical assistance should call delivery discrepancies be discovered. PWG also agrees to pay Washington state and county 911 taxes.

J. PWG Requests Exemption from Certain Provisions of WAC 480-123-030

PWG requests that the Commission exempt it from the ETC petition requirements set forth in WAC 480-123-030(1)(d), (f) and (g). Subsection (d) requires ETCs to provide a substantive plan of the investments it will make using USF funds. This requirement applies to carriers that seek high-cost support to fund investments to their networks; however, PWG seeks ETC designation solely for purposes of reimbursement for provision of subsidized low-income support services to eligible customers. Therefore, PWG has no basis for filing an investment plan and should be exempt from the requirement.

Subsection (f) requires wireless carriers to provide 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. PWG does not currently own, control, nor plan to develop cell sites, and PWG's coverage area encompasses that of its Underlying Carriers in Washington. The PWG switches reside in a multi-region layout in Amazon Web Services, which provides quite a bit of disaster recovery / business continuity. PWG does not have access to Underlying Carriers' service area maps showing the location of cell sites. Accordingly, PWG requests exemption from this requirement.

Subsection (g) provides that a petition for ETC designation must contain information affirming that a company has the ability to remain functional in emergency situations, including information that demonstrates it has at least four hours of backup battery power at each cell site, backup generators at each microwave hub, and at least five hours of backup battery power and backup generators at each switch. As noted in Section V.B of this Petition, PWG has the ability to remain functional in emergency situations through its Underlying Carriers. PWG does not own or operate any facilities, cell sites or microwave hubs, thus, PWG should be exempt from the requirement that it demonstrates it has backup battery power or generators.

VI. DESIGNATION OF PWG AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.²² Designation of PWG as an ETC in Washington will further that public interest. Whether because of financial constraints, poor credit history, or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. The FCC has in recent years expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”²³ Given this context, designating PWG as an ETC would significantly benefit low-income consumers eligible for Lifeline services in Washington—the intended beneficiaries of universal service.

²² *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

²³ See *Lifeline Modernization Order* ¶ 2.

A. Advantages of PWG's Service Offering

PWG offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. The public interest benefits of PWG's wireless service include larger calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile service, and a generous amount of voice and broadband access included without cost (after application of the Lifeline support), as well as free access to caller ID, call waiting, and Voicemail features, and access to 911 services regardless of the number of voice minutes remaining on the Lifeline consumer's plan. These no cost to consumer services and low-cost minutes are an invaluable resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for "unbanked" consumers.

PWG's Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (meeting the voice and broadband minimum service standards), at no net cost to the customer after application of Lifeline support. PWG's Lifeline offering will be provided over T-Mobile's 4G LTE network. PWG's prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues.

In today's market, consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents wherever they may be, allows a person seeking employment greater ability to be contacted by potential employers, and provides end users with the ability to contact

emergency service providers regardless of location. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.

Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing PWG with the authority necessary to offer discounted Lifeline service to those without wireless service—or most in danger of losing service altogether—undoubtedly promotes the public interest.

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.²⁴ Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of PWG as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.²⁵ Introducing PWG into the market as an additional wireless ETC provider will afford low-income Washington residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

²⁴ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

²⁵ See 47 U.S.C. § 254(b)(1).

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as PWG or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, PWG will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that PWG's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. PWG's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

VII. CONCLUSION

Based on the foregoing, designation of PWG as an ETC in the State of Washington satisfies the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, PWG respectfully requests that the Commission promptly designate PWG as an ETC in the State of Washington for the purpose of participating in the Lifeline program.

Respectfully submitted,



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Managing Attorney
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Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorneys for Prepaid Wireless Group, LLC

October 30, 2024

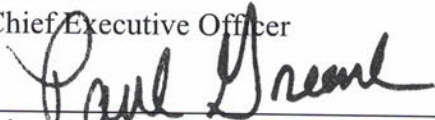
EXHIBIT 1

Certification

I declare under penalty of perjury under the law of Washington that the foregoing is true and correct.

Signed on the 4th day of October, 2024,
at Montgomery, Maryland

Paul Greene
Chief Executive Officer



(signature)

REDACTED PER WAC 480-07-160

EXHIBIT 2

WA Secretary of State Authority

REDACTED PER WAC 480-07-160
UNITED STATES OF AMERICA

The State of Washington



Secretary of State

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

CERTIFICATE OF REGISTRATION

to

PREPAID WIRELESS GROUP, LLC

A/AN MARYLAND LIMITED LIABILITY COMPANY, effective on the date indicated below.

Effective Date: 12/11/2018
UBI Number: 604 333 557



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

Handwritten signature of Kim Wyman in blue ink.

Kim Wyman, Secretary of State

Date Issued: 12/11/2018

REDACTED PER WAC 480-07-160

EXHIBIT 3

Facilities Description

CONFIDENTIAL & PROPRIETARY

CONFIDENTIAL PER WAC 480-07-160, in it's entirety

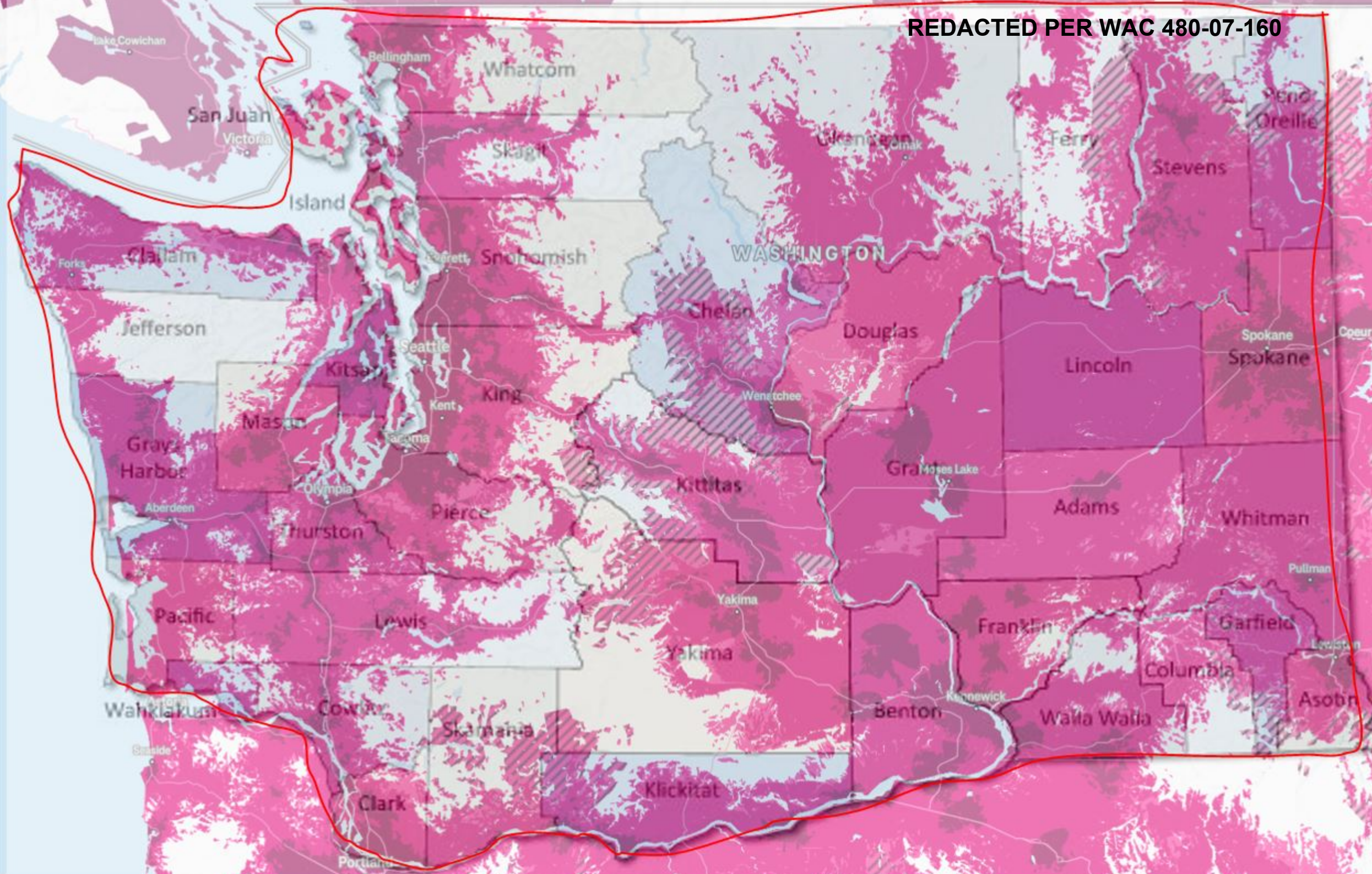


REDACTED PER WAC 480-07-160

EXHIBIT 4

Coverage Area

REDACTED PER WAC 480-07-160



PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Qwest Corporation	Spokane
Qwest Corporation	Bainbridge Island
Qwest Corporation	Battleground
Qwest Corporation	Belfair
Qwest Corporation	Bellevue
Qwest Corporation	Bellingham
Qwest Corporation	Black Diamond
Qwest Corporation	Bremerton
Qwest Corporation	Buckley
Qwest Corporation	Castle Rock
Qwest Corporation	Centralia
Qwest Corporation	Chehalis
Qwest Corporation	Clarkston
Qwest Corporation	Cle Elum
Qwest Corporation	Colfax
Qwest Corporation	Copalis
Qwest Corporation	Coulee Dam
Qwest Corporation	Dayton
Qwest Corporation	Deer Park
Qwest Corporation	Des Moines
Qwest Corporation	Easton
Qwest Corporation	Elk
Qwest Corporation	Enumclaw
Qwest Corporation	Ephrata
Qwest Corporation	Graham
Qwest Corporation	Green Bluff
Qwest Corporation	Hoodsport
Qwest Corporation	Issaquah
Qwest Corporation	Liberty Lake
Qwest Corporation	LongView Kelso
Qwest Corporation	Loon Lake

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Qwest Corporation	Maple Valley
Qwest Corporation	Moses Lake
Qwest Corporation	Newman Lake
Qwest Corporation	Northport
Qwest Corporation	Olympia
Qwest Corporation	Omak
Qwest Corporation	Oroville
Qwest Corporation	Othello
Qwest Corporation	Pasco
Qwest Corporation	Pomeroy
Qwest Corporation	Port Angeles
Qwest Corporation	Port Angeles
Qwest Corporation	Port Ludlow
Qwest Corporation	Port Orchard
Qwest Corporation	Port Townsend
Inland Telephone Company	Prescott
Qwest Corporation	Puyallup
Qwest Corporation	Renton
Qwest Corporation	Ridgefield
Qwest Corporation	Rochester
Inland Telephone Company	Roslyn
Qwest Corporation	Roy
Qwest Corporation	Seattle
Qwest Corporation	Sequim
Qwest Corporation	Silverdale
Qwest Corporation	Touchet
Qwest Corporation	Waitsburg
Qwest Corporation	Walla Walla
Qwest Corporation	Warden
Qwest Corporation	Winlock

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Qwest Corporation	Yakima
CenturyTel of Washington	South Prairie
CenturyTel of Washington	Orting
CenturyTel of Washington	Morton
CenturyTel of Washington	Glenoma
CenturyTel of Washington	Mineral
CenturyTel of Washington	Packwood
CenturyTel of Washington	Randle
CenturyTel of Washington	Washtucna
CenturyTel of Washington	McCleary
CenturyTel of Washington	Montesano
CenturyTel of Washington	Elma
CenturyTel of Washington	Vashon
CenturyTel of Washington	Cheney
CenturyTel of Washington	Spangle
CenturyTel of Washington	Reardan
CenturyTel of Washington	Medical Lake
CenturyTel of Washington	Davenport
CenturyTel of Washington	Kettle Falls
CenturyTel of Washington	Fall City
CenturyTel of Washington	Carnation
CenturyTel of Washington	North Bend
CenturyTel of Washington	Snoqualmie Pass
CenturyTel of Washington	Ames Lake
CenturyTel of Washington	ClearWater
CenturyTel of Washington	Almira
CenturyTel of Washington	Cathlamet/Puget Island
CenturyTel of Washington	Coulee City
CenturyTel of Washington	Curtis
CenturyTel of Washington	Edwall-Tyler

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
CenturyTel of Washington	Eureka
CenturyTel of Washington	Harrington
CenturyTel of Washington	Lebam
CenturyTel of Washington	Lind
CenturyTel of Washington	Nespelem
CenturyTel of Washington	Ocosta
CenturyTel of Washington	Odessa
CenturyTel of Washington	Pacific Beach
CenturyTel of Washington	Pe Ell
CenturyTel of Washington	Raymond
CenturyTel of Washington	South Bend
CenturyTel of Washington	Sprague
CenturyTel of Washington	Starbuck
CenturyTel of Washington	Vader
CenturyTel of Washington	Wilbur
CenturyTel of Washington	Wilson Creek
CenturyTel of Washington	Yacolt
Frontier Communications Northwest, Inc.	Arlington
Frontier Communications Northwest, Inc.	Benton City
Frontier Communications Northwest, Inc.	Brewster
Frontier Communications Northwest, Inc.	Bridgeport
Frontier Communications Northwest, Inc.	Burlington
Frontier Communications Northwest, Inc.	Cashmere
Frontier Communications Northwest, Inc.	Chelan
Frontier Communications Northwest, Inc.	Coupeville
Frontier Communications Northwest, Inc.	Darrington
Frontier Communications Northwest, Inc.	Entiat
Frontier Communications Northwest, Inc.	Fairfield
Frontier Communications Northwest, Inc.	Farmington
Frontier Communications Northwest, Inc.	Garfield

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Frontier Communications Northwest, Inc.	George
Frontier Communications Northwest, Inc.	Granite Falls
Frontier Communications Northwest, Inc.	Halls Lake
Frontier Communications Northwest, Inc.	Kennewick
Frontier Communications Northwest, Inc.	Latah
Frontier Communications Northwest, Inc.	Leavenworth
Frontier Communications Northwest, Inc.	Mansfield
Frontier Communications Northwest, Inc.	Monroe
Frontier Communications Northwest, Inc.	Moscow
Frontier Communications Northwest, Inc.	Mt Vernon
Frontier Communications Northwest, Inc.	Newport
Frontier Communications Northwest, Inc.	Oak Harbor
Frontier Communications Northwest, Inc.	Oakesdale
Frontier Communications Northwest, Inc.	Palouse
Frontier Communications Northwest, Inc.	Priest River
Frontier Communications Northwest, Inc.	Pullman
Frontier Communications Northwest, Inc.	Quincy
Frontier Communications Northwest, Inc.	Richland
Frontier Communications Northwest, Inc.	Richmond Beach
Frontier Communications Northwest, Inc.	Rockford
Frontier Communications Northwest, Inc.	Rosalia
Frontier Communications Northwest, Inc.	Silver Lake
Frontier Communications Northwest, Inc.	Skykomish
Frontier Communications Northwest, Inc.	Soap Lake
Frontier Communications Northwest, Inc.	Stanwood
Frontier Communications Northwest, Inc.	Stevens Pass
Frontier Communications Northwest, Inc.	Sultan
Frontier Communications Northwest, Inc.	Tekoa
Frontier Communications Northwest, Inc.	Tonasket
Frontier Communications Northwest, Inc.	Waterville

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Frontier Communications Northwest, Inc.	Wenatchee
United Telephone Company of The Northwest	Hood Canal
United Telephone Company of The Northwest	Chimacum
United Telephone Company of The Northwest	Columbia
United Telephone Company of The Northwest	Port Angeles
United Telephone Company of The Northwest	Port Angeles
United Telephone Company of The Northwest	Mabton
United Telephone Company of The Northwest	Glenwood
United Telephone Company of The Northwest	Goldendale
United Telephone Company of The Northwest	Grandview
United Telephone Company of The Northwest	Granger
United Telephone Company of The Northwest	Harrah
United Telephone Company of The Northwest	Klickitat
United Telephone Company of The Northwest	Lyle
United Telephone Company of The Northwest	Mattawa
United Telephone Company of The Northwest	Paterson
United Telephone Company of The Northwest	Poulsbo
United Telephone Company of The Northwest	Prosser
United Telephone Company of The Northwest	Roosevelt
United Telephone Company of The Northwest	Sunnyside
United Telephone Company of The Northwest	Toppenish
United Telephone Company of The Northwest	Trout Lake
United Telephone Company of The Northwest	Wapato
United Telephone Company of The Northwest	White Salmon
United Telephone Company of The Northwest	White Swan
United Telephone Company of The Northwest	Whitstran
United Telephone Company of The Northwest	Willard
United Telephone Company of The Northwest	Dallesport
Frontier Communications Northwest, Inc.	Acme
Frontier Communications Northwest, Inc.	Alger

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Frontier Communications Northwest, Inc.	Big Lake
Frontier Communications Northwest, Inc.	Concrete
Frontier Communications Northwest, Inc.	Conway
Frontier Communications Northwest, Inc.	Curlew
Frontier Communications Northwest, Inc.	Custer
Frontier Communications Northwest, Inc.	Deming
Frontier Communications Northwest, Inc.	Edison
Frontier Communications Northwest, Inc.	Everson
Frontier Communications Northwest, Inc.	Ferndale
Frontier Communications Northwest, Inc.	Grayland
Frontier Communications Northwest, Inc.	La Conner
Frontier Communications Northwest, Inc.	Laurel
Frontier Communications Northwest, Inc.	Loomis
Frontier Communications Northwest, Inc.	Lyman-Hamilton
Frontier Communications Northwest, Inc.	Lynden
Frontier Communications Northwest, Inc.	Maple Falls
Frontier Communications Northwest, Inc.	Marblemount
Frontier Communications Northwest, Inc.	Molson
Frontier Communications Northwest, Inc.	Naches
Frontier Communications Northwest, Inc.	Nile
Frontier Communications Northwest, Inc.	Republic
Frontier Communications Northwest, Inc.	Sedro Woolley
Frontier Communications Northwest, Inc.	Sumas
Frontier Communications Northwest, Inc.	Westport
Lewis River Telephone Company, Inc.	La Center
Lewis River Telephone Company, Inc.	Amboy
Lewis River Telephone Company, Inc.	Yale
Lewis River Telephone Company, Inc.	Cougar
Lewis River Telephone Company, Inc.	Swift
Whidbey Telephone Company	South Whidbey

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Whidbey Telephone Company	Point Roberts
Mashell Telecom Inc.	Kapowsin
Skyline Telecom, Inc.	Mt Hull
Pioneer Telephone Company	La Crosse
Pioneer Telephone Company	Endicott
Pend Oreille Telephone Company	Cusick
Pend Oreille Telephone Company	Ione
Pend Oreille Telephone Company	Metaline Falls
McDaniel Telephone Company	Salkum
McDaniel Telephone Company	Mossyrock
McDaniel Telephone Company	Onalaska
Kalama Telephone Company	Kalama
Inland Telephone Company	Uniontown
Hood Canal Telephone Co., Inc.	Union
Tenino Telephone Company	Bucoda
Tenino Telephone Company	Tenino
Hat Island Telephone Company	Hat Island
CenturyTel of Cowiche, Inc.	Cowiche
CenturyTel of Cowiche, Inc.	Tieton
CenturyTel of Cowiche, Inc.	Rimrock
Asotin Telephone Company	Asotin
Asotin Telephone Company	Anatone
Consolidated Communications of WA Co., LLC	Selah
Western Wahkiakum County Telephone Company	Grays River
Western Wahkiakum County Telephone Company	Naselle
St John Co-Op Telephone & Telegraph Company	St John
Qwest Corporation	Aberdeen-Hoquiam
Qwest Corporation	Springdale
CenturyTel of Washington	Creston
United Telephone Company of The Northwest	Stevenson

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
Qwest Corporation	Sumner
Qwest Corporation	Crystal Mountain
Frontier Communications Northwest, Inc.	Blaine
Inland Telephone Company	Dewatto
Frontier Communications Northwest, Inc.	Bothell
Frontier Communications Northwest, Inc.	Kirkland
Frontier Communications Northwest, Inc.	Woodland
Qwest Corporation	Kent
Qwest Corporation	Auburn
CenturyTel of Washington	Royal City
Skyline Telecom, Inc.	Silverton
Qwest Corporation	Tacoma
Qwest Corporation	Tacoma
Qwest Corporation	Tacoma
Qwest Corporation	Tacoma
Frontier Communications Northwest, Inc.	Marysville
Frontier Communications Northwest, Inc.	Snohomish
Frontier Communications Northwest, Inc.	Everett
Qwest Corporation	Vancouver
CenturyTel of Washington	Long Beach
CenturyTel of Washington	Chewelah
CenturyTel of Washington	Mathews Corner
CenturyTel of Washington	Connell
CenturyTel of Inter Island, Inc.	San Juan
CenturyTel of Washington	Kingston
CenturyTel of Washington	Ritzville
CenturyTel of Washington	Forks
CenturyTel of Washington	Lake Quinault
Frontier Communications Northwest, Inc.	Anacortes
CenturyTel of Washington	Twisp

PREPAID WIRELESS GROUP, LLC

Requested Exchanges

ILEC NAME	EXCHANGE
CenturyTel of Washington	Gig Harbor
The Toledo Telephone Company	Toledo
Qwest Corporation	Colville/Orient Laurier
Qwest Corporation	Shelton
Qwest Corporation	Pateros
CenturyTel of Washington	Ashford
Mashell Telecom Inc.	Eatonville
Consolidated Communications of WA Co., LLC	Yelm
Consolidated Communications of WA Co., LLC	Ellensburg
Frontier Communications Northwest, Inc.	Camas-Washougal
Frontier Communications Northwest, Inc.	Camas-Washougal
Frontier Communications Northwest, Inc.	Camas-Washougal

REDACTED PER WAC 480-07-160

EXHIBIT 5

Sample Advertisement



REDACTED PER WAC 480-07-160

**40
MILLION**

**AMERICANS QUALIFY
FOR FREE SERVICE
WITH LIFELINE**

Are you one of them?

**1,000 MINUTES,
UNLIMITED TEXT,
& 4.5GB OF DATA**



[**▶ LEARN MORE**](#)

THIS IS A LIFELINE SUPPORT SERVICE AND IS A GOVERNMENT ASSISTANCE PROGRAM. ELIGIBILITY IS BASED ON INCOME OR PARTICIPATION IN CERTAIN GOVERNMENT BENEFIT PROGRAMS AND IS DETERMINED BY THE NATIONAL VERIFIER (DOCUMENTATION MAY BE REQUIRED). LIFELINE BENEFITS ARE NON-TRANSFERABLE AND LIMITED TO ONE PER HOUSEHOLD. OFFERS MAY VARY BY STATE WHERE AVAILABLE. SERVICE PROVIDED BY GLOBAL CONNECTION INC. OF AMERICA.

EXHIBIT 6

Proposed Lifeline Offering

+LIFELINE PLANS	VOICE	TEXT (SMS)	DATA High Speed	LIFELINE PRICE	TRIBAL LIFELINE PRICE
Lifeline-Only	1,000	Unlimited	4.5 GB	\$0.00	N/A

ADDITIONAL AIRTIME "TOP-UPS"	VOICE	DATA
\$5.00	250	250 MB
\$10.00	None	1.5 GB
\$10.00	Unlimited	1 GB
\$20.00	Unlimited	3 GB
\$30.00	Unlimited	8 GB

Top-Ups expire after 30 days

All packages include:

- Free calls to PWG Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card

Please also see the Company's website at www.pwgns.com for further description of its service offerings and the Terms and Conditions of Service.

REDACTED PER WAC 480-07-160

EXHIBIT 7

Key Management Bios

NATHAN STIERWALT

COO, CSO, CMO AT PWG NETWORK SOLUTIONS

About

As the Chief Sales and Marketing Officer at PWG Network Solutions, I have over 25 years of experience in the wireless industry, with a focus on delivering innovative and customer-centric solutions for MVNOs and IOT. I lead the sourcing, development, implementation, and management of worldwide MVNOs and IOT solutions, leveraging our MVNA platform and network aggregation capabilities.

I also serve as a board member of the National Lifeline Association (NaLA), where I advocate for the interests and needs of low-income wireless consumers and providers. My specialties include developing and executing marketing strategies, branding, advertising, and sales channels, as well as building and maintaining strong customer relationships and partnerships. I thrive on leading and empowering high-performing teams, fostering a culture of collaboration and excellence, and driving revenue and growth for PWG and our clients.

Experience

COO, CSO, CMO PWG Network Solutions	Jan 2024 – Present
COO, CSO, CMO StandUp Wireless	Jun 2017 – Present
Chief Sales and Marketing Officer IOT and MVNO Wireless Aggregation Solutions	Jan 2013 – Jan 2024
Vice President Sales & Marketing Prepaid Wireless Group, LLC	Feb 2010 – Sep 2023
Vice President Sales & Marketing Cozac Wireless	Feb 2010 - Sep 2023
Director of Sales & Marketing Powernet Global	Apr 2008 – Feb 2010
Sr. Marketing Manager Cincinnati Bell	May 2004 – Mar 2008
Marketing Manager Prepaid Wireless	May 2003 – May 2004
Marketing Manager Home Phone Services, Long Distance, CPE	Jan 2002 – May 2003
Channel Manager	Jan 2001 – Jan 2002
Communications Consultant	May 1998 – Jan 2001

Education

University of Phoenix 2003-2005

Marketing

Northern Kentucky University 1995 - 1998

Skills & abilities

- Marketing
- Strategy
- Advertising
- Sales
- Vendor Management
- Management
- Sales Management
- Telecommunications

Paul Greene

CEO

About

I have over 20 years of experience in the wireless telecommunications industry. I have a proven track record of driving growth, innovation, and customer satisfaction in this dynamic and competitive field.

My core competencies include new business development, marketing strategy, search engine optimization, negotiation, sales, entrepreneurship, and strategic planning. I am passionate about delivering affordable and accessible wireless solutions that empower low-income and underserved communities across the US. I also strive to create a positive and collaborative work environment that fosters creativity, agility, and excellence among our team.

Experience

Chief Executive Officer StandUp Wireless	Dec 2011 - Present
CEO Prepaid Wireless Group	Jan 2011 – Present
CEO Liberty Wireless	Aug 2011 – Present
CEO Vortex Cellular	Mar 2009 - Present

Education

Salisbury University – Perdue School of Business **1984-1987**
 BS, Business Administration and Management, General
 Activities and Societies: ECAC team of the year
 #2 ranked football team (1986)

Skills & abilities

- Marketing Strategy
- Account Management
- Business Development
- Business Strategy
- Entrepreneurship
- Product Management

EXHIBIT 8

Service Quality and Consumer Protection

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – the Company does not employ contracts.
4. Allow a trial service – Since Lifeline customers receive free service, there is no commitment to the service on their part. If the service does not suit their needs, they can cancel service at any time without penalty.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – the Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply. Customers can, however, cancel service at any time without penalty.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or an 800 number. These numbers are disclosed on the Company's website and in advertising and customer welcome materials.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – We promptly respond to all complaints. If a customer care representative cannot help a customer, we have an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Because the Company's service is prepaid, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, (“mobile wireless devices”) that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company’s website.
- (5) Response Time. Within two business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.

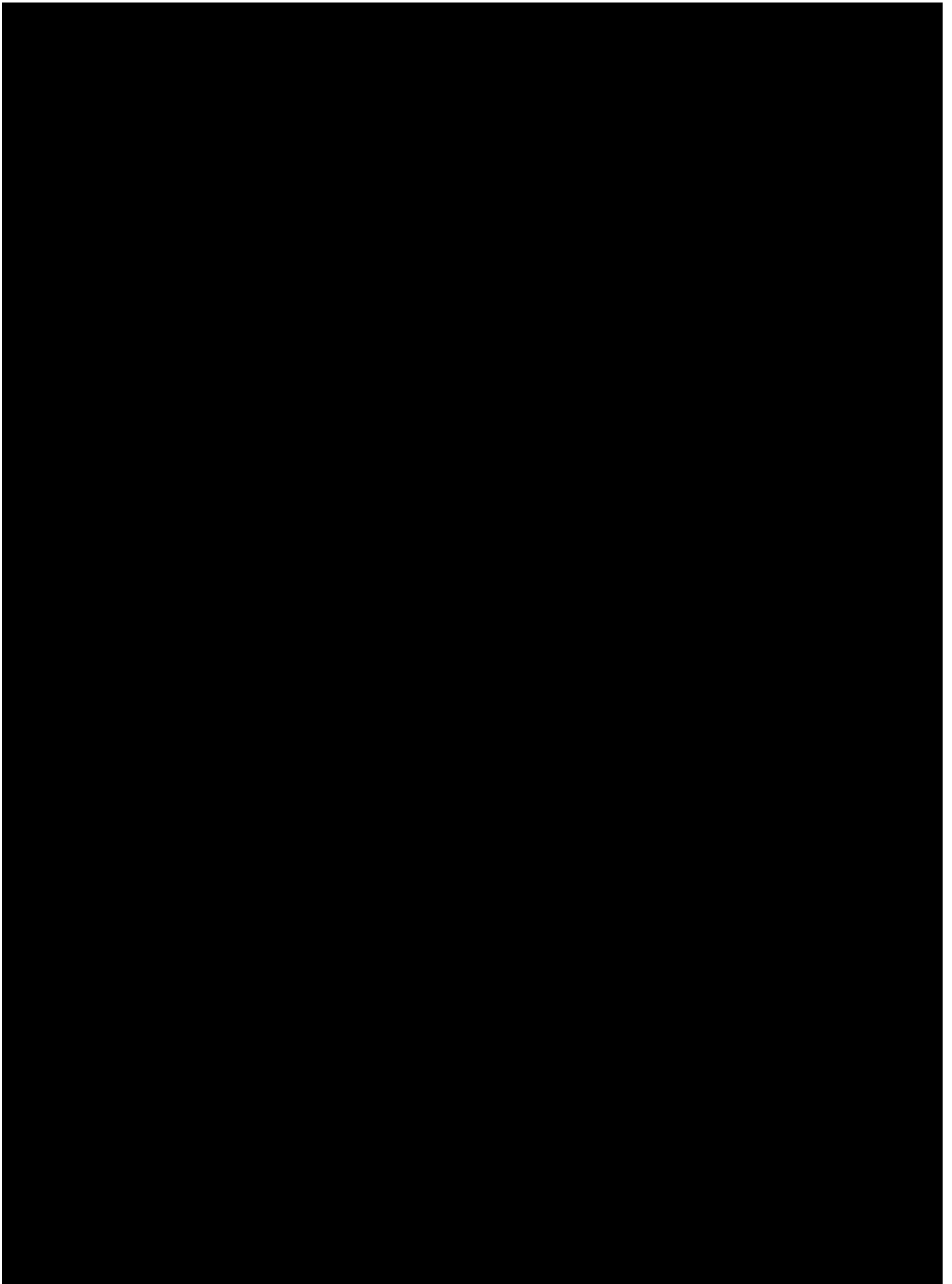
REDACTED PER WAC 480-07-160

EXHIBIT 9

Financial Statements

CONFIDENTIAL & PROPRIETARY

CONFIDENTIAL PER WAC 480-07-160, in it's entirety



REDACTED PER WAC 480-07-160

EXHIBIT 10

Corporate Structure Diagram

Entity Organizational Chart

