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July 6, 2022

VIA ELECTRONIC FILING

Mr. David Danner, Chairman
State Of Washington
Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Global Connection Inc. of America d/b/a StandUP Wireless

Dear Mr. King:

Enclosed please find for filing Global Connection Inc. of America d/b/a StandUP Wireless' ("Applicant") Petition for Designation as an Eligible Telecommunications Carrier on a Wireless Basis (Low Income Only) with redacted copies of Exhibit 6.

EXHIBIT 6 IS MARKED WITH "CONFIDENTIAL PER WAC 480-07-160". DUE TO THE HIGHLY COMPETITIVE NATURE OF THE TELECOMMUNICATIONS MARKETPLACE, PETITIONER RESPECTFULLY REQUESTS CONFIDENTIAL TREATMENT OF THE PROPRIETARY INFORMATION. PETITIONER EXPECTS THAT THIS INFORMATION WILL BE RESTRICTED TO COUNSEL, AGENTS AND EMPLOYEES WHO ARE SPECIFICALLY ASSIGNED TO THIS APPLICATION BY THE COMMISSION.

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

Respectfully submitted,

/s/ Lance Steinhart

Lance Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for Global Connection Inc. of America
d/b/a StandUP Wireless

Enclosures
cc: Eric Schmipf

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

**GLOBAL CONNECTION INC. OF AMERICA
DBA STANDUP WIRELESS FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER ON A
WIRELESS BASIS (LOW INCOME ONLY)**

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PETITION

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July 6, 2022

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**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

| | | |
|--|---|-----------------------|
| In the Matter of the Petition of |) | DOCKET NO. UT- |
| GLOBAL CONNECTION INC. OF AMERICA |) | |
| DBA STANDUP WIRELESS FOR |) | |
| DESIGNATION AS AN ELIGIBLE |) | |
| TELECOMMUNICATIONS CARRIER ON A |) | |
| WIRELESS BASIS (LOW INCOME ONLY) |) | |

PETITION

I. INTRODUCTION

Global Connection Inc. of America dba StandUP Wireless (“StandUP Wireless” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and 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. StandUP Wireless seeks ETC designation 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 providing service to high cost areas.³

As demonstrated herein, and as certified in Exhibit 1 to this Petition, StandUP Wireless meets all the statutory and regulatory requirements for designation as an ETC in the State of

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that StandUP Wireless only seeks 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 StandUP Wireless.

Washington, including the requirements outlined in the FCC’s *USF/ICC Transformation Order*,⁴ *Lifeline and Link Up Reform Order*,⁵ and recent *Lifeline Modernization Order*.⁶ Rapid grant of StandUP Wireless’s request, moreover, would advance the public interest because it would enable StandUP Wireless to commence much needed Lifeline service to low-income Washington residents as soon as possible. Accordingly, StandUP Wireless respectfully requests that the Washington Utilities and Transportation Commission (“Commission”) expeditiously approve this Petition for ETC designation.

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 Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”).

⁵ *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*”).

⁶ *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. 00-197, 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*”).

II. BACKGROUND

A. Company Overview

StandUP Wireless is a Georgia Corporation authorized to transact business in the State of Washington.⁷ Its principal office is located at 842 Monmouth Street, Newport, Kentucky 41071. StandUP Wireless is currently a wholly owned subsidiary of Global Connection Holdings Corporation (“Global Holdings”), a U.S. company, whose principal place of business is located at 842 Monmouth Street, Newport, Kentucky 41071. Global Holdings operates as a holding company for StandUP Wireless and does not provide telecommunications services. StandUP Wireless does not have any operating companies or telecommunications affiliates.⁸

StandUP Wireless is a provider of commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless network of T-Mobile USA, Inc. (“T-Mobile” or its “Underlying Carrier”) on a wholesale basis. StandUP Wireless obtains from T-Mobile the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”), similar to TracFone Wireless, Inc. (“TracFone”) and YourTel America Inc. (“YourTel”), which have been granted ETC status by the Commission.⁹ StandUP Wireless is currently designated as a wireless Lifeline only ETC in the following jurisdictions: Arkansas, Arizona, California, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky,

⁷ StandUP Wireless was incorporated in the State of Georgia on June 1, 1998.

⁸ Following the proposed change in StandUP Wireless’s majority ownership described further herein, the Company’s corporate and trade names and identifiers will remain unchanged, and it will continue to have no separate operating companies; however, it will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless as discussed in detail in Section III.I herein.

⁹ *Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Washington for the Limited Purposes of Offering Lifeline and Link Up Service to Qualified Households*, As Amended, Order 03, Docket No. UT-093012 (June 24, 2010) (“*TracFone ETC Order*”); *Petition of YOURTEL AMERICA, INC. for an Exemption from WAC 480-123-030(1)(d), (f) and (g), and Designation as an Eligible Telecommunications Carrier*, Order 01, Docket No. UT-110423 (June 16, 2011) (“*YourTel ETC Order*”).

Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Tennessee, Texas, Utah, Wisconsin and West Virginia. StandUP Wireless currently has applications for wireless ETC designation pending with the FCC (for Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, North Carolina, and Virginia); no such petitions have been denied. StandUP Wireless also provides prepaid wireless telecommunications services throughout the United States through which it participates in the Affordable Connectivity Program (“ACP”).

StandUP Wireless’s prepaid wireless services are affordable and attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. StandUP Wireless offers consumers affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of its customers in other jurisdictions, StandUP Wireless anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. StandUP Wireless does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless and broadband plans to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, StandUP Wireless will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

B. Proposed Lifeline Offering

StandUP Wireless has the ability to provide all services supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Washington. StandUP Wireless is a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and broadband usage, in addition to outstanding customer service. StandUP Wireless's prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, StandUP Wireless will receive support from the Lifeline program as compensation for providing those services.

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

Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers will receive 1,000 voice minutes, unlimited text messages, and 4.5 gigabytes (GB) of data per month with full access to T-Mobile's 4G LTE network at a net cost of \$0.00 after application of Lifeline support.¹⁰ Lifeline customers that also

¹⁰ The current rate plan is based upon the 2021 FCC minimum service standards ("MSS") and will change based on the future MSS. Residents of federally recognized tribal lands will receive unlimited talk, text and 10GB of data at net cost of \$0.00.

elect to receive ACP benefits from StandUP Wireless will receive unlimited talk and text with 10 GB data after application of Lifeline and ACP support at a net cost of \$0.00. Customers will be able to purchase additional minutes or data as needed.

Customers may use their minutes to place domestic long distance calls at no additional charge. Calls to StandUP Wireless customer service made by customers via their StandUP Wireless handset will not deplete the customer's available airtime. StandUP Wireless customers can contact customer service by dialing a short code (e.g., *611) from their StandUP Wireless phone to address billing, service and general account issues. Customers whose balance of voice minutes has been exhausted will still be able to make outbound calls to StandUP Wireless customer service as long as their service is active. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. All Lifeline plans will also include access to the following custom calling features at no charge: (1) Caller ID; (2) Call Waiting; (3) 3-Way Calling; and (4) Voicemail.

StandUP Wireless's Lifeline offering will allow feature-rich mobile and broadband connectivity for qualifying subscribers at no cost to the subscriber after application of Lifeline support, without the burden of credit checks or service contracts. StandUP Wireless'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.

C. Plan Enrollment

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. StandUP Wireless 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).¹¹ StandUP Wireless 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. StandUP Wireless 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.

All applicants will be advised that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.¹² If not applying in person, the applicant must return the signed enrollment form and any supporting documentation to the address provided by StandUP Wireless. Processing of consumers’

¹¹ *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>).

¹² See 47 C.F.R. § 54.405(c).

applications, including review of all application forms and relevant documentation, will be performed under the Company's supervision by managers experienced in the administration of the Lifeline program.

In addition, the Company 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. StandUP Wireless will annually re-certify the continued eligibility of all of its Lifeline subscribers in accordance with federal and Commission regulations, and the Company's certification form will also require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by FCC rules (47 C.F.R. § 54.410(d) and (f)). StandUP Wireless will certify and verify consumer eligibility in accordance with 47 C.F.R. § 54.410, utilizing the streamlined eligibility criteria implemented by the *Lifeline Modernization Order* (see 47 C.F.R. § 54.409).

D. Prevention of Waste, Fraud and Abuse

StandUP Wireless recognizes the importance of safeguarding the USF. In addition, 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. StandUP Wireless 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 StandUP Wireless or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. StandUP Wireless 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.

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), StandUP Wireless 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, StandUP Wireless has contracted with CGM, LLC of Roswell, Georgia, a Lifeline service bureau, to edit all subsidy request data. CGM will process and validate StandUP Wireless's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from StandUP Wireless will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, StandUP Wireless ensures that it does not over-request from support funds.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Act (47 U.S.C. § 214(e)(2)) provides state public utility commissions with the “primary responsibility” for the designation of ETCs. 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.¹³ Therefore, the Commission has the authority to designate StandUP Wireless as an ETC. Pursuant to this authority, the Commission has designated numerous carriers as ETCs in the State of Washington, including many wireless carriers.¹⁴

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). StandUP Wireless 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. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.¹⁵ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to

¹³ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“USF Order”).

¹⁴ See e.g., *In the Matter of the Petition of RCC Minnesota, Inc. d/b/a Cellular One for Designation as an Eligible Telecommunications Carrier, Order Granting Petition for Designation as an Eligible Telecommunications Carrier*, Docket No. UT-023033 (Aug. 14, 2002); See also *Tracfone ETC Order* and *YourTel ETC Order*.

¹⁵ See *Lifeline and Link Up Reform Order* at ¶ 368.

forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance with the FCC’s grant of forbearance, and therefore, may not apply the facilities-based requirement to StandUP Wireless. Therefore, the Commission has the authority to act under Section 214(e)(2) of the Act and to grant StandUP Wireless’s request for designation as an ETC throughout the State of Washington.

IV. STANDUP WIRELESS SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

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.¹⁶ 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 will 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, except where the FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services,¹⁷ and provide additional information set forth in 47 C.F.R. § 54.202(a). As detailed below, StandUP Wireless satisfies each of the above-listed requirements.

A. StandUP Wireless Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as StandUP Wireless.

¹⁶ See *USF Order*, at 8858-59, ¶ 145.

¹⁷ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹⁸

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

In accordance with the *Lifeline and Link Up Reform Order*, StandUP Wireless filed a Compliance Plan with the FCC, which the FCC approved on May 25, 2012.¹⁹ In addition, StandUP Wireless’ Revised FCC Compliance Plan which the FCC approved is attached hereto as Exhibit 3. StandUP Wireless commits to providing Lifeline service in Washington in accordance with its approved Compliance Plan, as amended, and applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

¹⁸ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

¹⁹ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

B. StandUP Wireless Is a Common Carrier

StandUP Wireless is a resale-based CMRS provider, and is thus a common carrier.²⁰

C. StandUP Wireless Will Provide All Required Supported Services

Through its Underlying Carrier, StandUP Wireless 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. StandUP Wireless provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Underlying Carrier.

Local Usage. As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. StandUP Wireless offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. StandUP Wireless provides 911 and E911 access for all of its customers, regardless of activation status and availability of minutes, to the extent the local government in its service area has implemented 911 or E911 systems. StandUP Wireless also complies with the FCC's regulations governing access to emergency services, the deployment and availability of E911 compatible handsets, and availability of text-to-911 features.

²⁰ *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].

Toll Limitation for Qualified Low-Income Customers. In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.²¹ “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.”²² Nonetheless, StandUP Wireless’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. StandUP Wireless’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

While no longer a required supported stand-alone service (although it is when bundled with voice) under 47 C.F.R. § 54.101(a), STANDUP 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.”²³ StandUP Wireless provides BIAS to low-income consumers via resale of T-Mobile’s services.

²¹ See *Lifeline and Link Up Reform Order* at ¶ 367.

²² See *Lifeline and Link Up Reform Order* at ¶ 49.

²³ See 47 C.F.R. § 8.2(a).

D. StandUP Wireless Will Advertise the Availability of Supported Services

StandUP Wireless 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) of the FCC's regulations. StandUP Wireless's advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined in StandUP Wireless's Compliance Plan.²⁴ StandUP Wireless 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. StandUP Wireless will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. StandUP Wireless 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.²⁵

²⁴ See Exhibit 3, section I.F, and supra note 16. See also *Lifeline and Link Up Reform Order* at Section VII.F, and 47 C.F.R. § 54.405(c).

²⁵ See attached Exhibit 4 for a sample advertisement.

E. StandUP Wireless Requests Designation Throughout Its Service Area in Washington

StandUP Wireless is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, StandUP Wireless is required to describe the geographic area(s) within which it requests designation as an ETC. StandUP Wireless requests designation as an ETC that is statewide in scope, subject to the existence of its Underlying Carrier's facilities and corresponding coverage, including federally recognized tribal lands.²⁶ StandUP Wireless understands that its service area may overlap 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. It does not seek and will not accept Link-Up or high cost support.

F. Service Commitment Throughout the Proposed Designated Service Area

StandUP Wireless provides service in Washington by reselling service which it obtains from its underlying facilities-based providers. The providers' networks are operational and largely built out. Thus, StandUP Wireless will be able to commence offering its Lifeline service to all locations served by its Underlying Carrier very soon after receiving approval from the Commission. In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification, StandUP Wireless commits to comply with the service requirements applicable to the support that it receives. 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.²⁷

²⁶ A list of areas in which StandUP Wireless requests ETC designation is attached hereto as Exhibit 5.

²⁷ See also *Lifeline and Link Up Reform Order* at ¶ 386.

G. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. §54.202(a)(2), StandUP Wireless has the ability to remain functional in emergency situations. As discussed, StandUP Wireless will utilize the extensive and well-established T-Mobile network and facilities to provide its Lifeline services. The Company understands that the Underlying Carrier's network has access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Indeed, T-Mobile has certified to the FCC that its network functions in emergency situations.²⁸ T-Mobile provides the same functionality to StandUP Wireless and its customers as it provides to itself s and its own customers.

H. Commitment to Consumer Protection and Service Quality

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and for wireless applicants, a commitment to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service satisfies this requirement.²⁹ StandUP Wireless hereby commits to comply with the CTIA Consumer Code for Wireless Service.

²⁸ See, e.g., *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

²⁹ See 47 C.F.R. § 54.202(a)(3).

I. StandUP Wireless is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), StandUP Wireless is financially and technically capable of providing Lifeline-supported services.³⁰ StandUP Wireless offered non-Lifeline and Lifeline wireline service from 1998 until 2019, and has been providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates revenues from non-Lifeline services; consequently, StandUP Wireless has not relied (and does not intend to rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In the event that USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. In addition, StandUP Wireless has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to StandUP Wireless through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement dated February 16, 2017, by and among StandUP Wireless, Global Holdings, and Odin Mobile, LLC ("Odin Mobile") (collectively, the "Parties"), Odin Mobile will acquire seventy five percent (75%) of the stock in StandUP Wireless, which will become its majority-owned direct subsidiary (the "Transaction").³¹ A majority (ninety-nine percent (99%)) interest in Odin Mobile (and thus, the majority indirect interest in StandUP Wireless) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of StandUP Wireless.³² A diagram of

³⁰ See Exhibit 6 for financial information, which is confidential and proprietary.

³¹ The Parties have obtained all required approvals for the proposed Transaction from the FCC and all applicable state regulatory authorities.

³² The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

the corporate structure of StandUP Wireless and Odin Mobile both pre-Transaction and post-close is provided as Exhibit 7.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC (“PWG”), an MVNE that supplies airtime through the T-Mobile network. PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator (“MVNO”) market. PWG is one of the nation’s longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are interconnected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator.

PWG's network infrastructure and T-Mobile relationship enables PWG to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier's ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.³³ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

³³ Mr. Greene also owns interest in several other non-communications-related businesses.

With respect to technical expertise, StandUP Wireless has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireless ETC designations in thirty (30) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. StandUP Wireless has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless, LLC working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of StandUP Wireless's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable StandUP Wireless to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state.³⁴ The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of the

³⁴ The FCC issued a Notice of Apparent Liability for Forfeiture ("NAL") to the Company on December 11, 2013 alleging that StandUP Wireless failed to comply with FCC rules by requesting and receiving reimbursement payments from the federal USF for intra-company duplicate Lifeline enrollments, a claim which the Company timely disputed. Even if the alleged duplicates actually were duplicates (which StandUP Wireless disputed), StandUP Wireless was still 99.38% effective at identifying and preventing duplicate enrollments. The Company entered into a Consent Decree with the FCC (Order released December 29, 2017, FCC 17-175) which resolved the NAL with no admission of liability by StandUP Wireless.

Company's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff. StandUP Wireless agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

J. StandUP Wireless Will Comply With Reporting Requirements

StandUP Wireless 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 other reports the Commission deems necessary as a condition of ETC designation.

K. StandUP Wireless Will Comply With All Regulations Imposed By The Commission

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

StandUP Wireless is willing to 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. StandUP Wireless is also willing to 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 StandUP Wireless's proprietary software and technical assistance should call delivery discrepancies be discovered.

L. StandUP Wireless Requests Exemption from Certain Provisions of WAC 480-123-030

StandUP Wireless 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, StandUP Wireless seeks ETC designation solely for purposes of reimbursement for provision of subsidized low-income support services to eligible customers. Therefore, StandUP Wireless 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. StandUP Wireless does not own, control, nor plan to develop cell sites, and StandUP Wireless's coverage area encompasses that of its Underlying Carrier in Washington. StandUP Wireless does not have access to underlying carrier service area maps showing the location of cell sites. Accordingly, StandUP Wireless 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 IV.G of this Petition, StandUP Wireless has the ability to remain functional in emergency situations through its Underlying Carrier. StandUP Wireless does not own or operate any facilities, cell sites or microwave hubs, thus, StandUP Wireless should be exempt from the requirement that it demonstrate it has backup battery power or generators.

V. DESIGNATION OF STANDUP WIRELESS 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.³⁵ Designation of StandUP Wireless 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. Given this context, designating StandUP Wireless as an ETC would benefit low-income consumers eligible for Lifeline service in the State of Washington—the intended beneficiaries of universal service.

³⁵ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

A. Advantages of StandUP Wireless’s Service Offering

The public interest benefits of StandUP Wireless’s wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime and data at no net cost, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, and 911/E911 service in accordance with current FCC requirements. The mobility of StandUP Wireless’s service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or work in migratory jobs. Wireless service offers a stable contact method where traditional landline service would be unavailable or not a viable option. StandUP Wireless’s prepaid wireless service is an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long term contract issues. For consumers with limited resources, the ability to meet their communications and broadband access needs while at the same time anticipating and controlling the associated costs is critical.

StandUP Wireless’s Lifeline program will provide low-income Washington residents with the convenience and security offered by wireless services—even if their financial position deteriorates. StandUP Wireless’s Lifeline offering is an invaluable resource for emergency services and for cash-strapped consumers who may be seeking employment or simply need to maintain contact with family members. It is also a commonly accepted fact that 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 the ability to be contacted by

potential employers, and provides end users with the ability to contact emergency service providers, regardless of location.

Finally, grant of StandUP Wireless's Petition will serve the public interest in increasing the number of ETCs in Washington. By granting ETC status to StandUP Wireless, the Commission will enable StandUP Wireless to increase the number of Washington residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Washington. In sum, ETC designation in the State of Washington would enable StandUP Wireless to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, StandUP Wireless would provide "increased consumer choice, high-quality service offerings, and mobility,"³⁶ as well as the safety and security of effective 911 and E911 services.³⁷

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.³⁸ Designation of StandUP Wireless as an ETC will promote competition and innovation, spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. As an ETC, StandUP Wireless will ensure that quality services are available at "just, reasonable, and affordable rates" as envisioned in the Act.³⁹ Introducing StandUP Wireless into the market as an additional wireless ETC provider will afford low income Washington residents a wider choice of providers and available services, while enhancing a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers.

³⁶ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

³⁷ See *Id.* at 3391 ¶ 23.

³⁸ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

³⁹ See 47 U.S.C. § 254(b)(1).

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.

C. Impact on the Universal Service Fund

StandUP Wireless's request for designation as an ETC solely for purposes of participating in the Lifeline program would not unduly burden the USF or otherwise reduce the amount of funding available to other ETCs. 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 StandUP Wireless or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same the Company's designation as an ETC; StandUP Wireless will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not 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 StandUP Wireless's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized.

StandUP Wireless'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. According to the FCC, "the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest," and "A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline

program outweighs the potential costs.”⁴⁰

VI. ANTI-DRUG ABUSE CERTIFICATION

StandUP Wireless certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

VII. CONCLUSION

Based on the foregoing, designation of StandUP Wireless 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, StandUP Wireless respectfully requests that the Commission promptly designate StandUP Wireless as an ETC in the State of Washington.

Respectfully submitted,



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*Attorneys for Global Connection Inc. of
America dba StandUP Wireless*

July 6, 2022

⁴⁰ See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

EXHIBIT 1

Certification of Company Officer

CERTIFICATION

STATE OF KENTUCKY

COUNTY OF CAMPBELL

I, Eric Schimpf, the CEO of Global Connection Inc. of America dba StandUP Wireless (“Company”), certify under penalty of perjury under the laws of the State of Washington that the statements made in the Company’s Petition for Designation as an Eligible Telecommunications Carrier and supplements thereto are true and correct to the best of my knowledge and belief.

Date: 7.1.2022



Eric Schimpf - Chief Operating Officer
Global Connection Inc. of America
d/b/a STANDUP WIRELESS

EXHIBIT 2

Proposed Lifeline Offering

STANDUP WIRELESS LIFELINE OFFERING

| | LIFELINE PLANS | VOICE | TEXT (SMS) | DATA High Speed | LIFELINE PRICE |
|---|---------------------------|--------------|-------------------|----------------------------|-----------------------|
| 1 | Lifeline-Only Broadband | 1,000 | Unlimited | 4.5 GB | \$0.00 |
| 2 | Lifeline/ACP Bundle \$30 | Unlimited | Unlimited | 5 GB ** | \$0.00* |
| 3 | Lifeline/ACP Bundle \$40 | Unlimited | Unlimited | 10 GB ** | \$0.00* |
| 4 | Lifeline/ACP Bundle \$50 | Unlimited | Unlimited | 12 GB ** | \$10.00* |
| 5 | Lifeline/ACP Bundle \$60 | Unlimited | Unlimited | 16 GB ** | \$20.00* |
| 6 | Lifeline/ACP Bundle \$75 | Unlimited | Unlimited | 25 GB ** | \$35.00* |
| 7 | Lifeline/ACP Bundle \$110 | Unlimited | Unlimited | 60 GB ** | \$70.00* |

Reflects application of Lifeline discount as well as federal Affordable Connectivity Program (ACP) discount and any company discount.

**ACP bundles include unlimited throttled data after the high-speed allotment has been used.

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

Top-Ups expire
after 30 days

All packages include:

- Free calls to STANDUP 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

Terms & Conditions maintained at www.StandUpWireless.com

EXHIBIT 3

StandUP Wireless's FCC-Approved Revised Compliance Plan



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 18-854

Released: August 15, 2018

WIRELINE COMPETITION BUREAU APPROVES THE WIRELINE AND WIRELESS COMPLIANCE PLAN OF GLOBAL CONNECTION

WC Docket Nos. 09-197, 11-42

The Wireline Competition Bureau (Bureau) hereby approves the joint wireline and wireless compliance plan¹ of Global Connection, Inc. of America, (Global Connection) filed pursuant to the requirements for the continued provision of Lifeline service.²

The Act provides that a carrier be designated as an eligible telecommunications carrier (ETC) to receive universal service support.³ The Commission has required that all telecommunications carriers seeking Lifeline-only ETC designation must meet the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement its obligations.⁴

The Bureau has clarified that any transfer of ownership or control of an ETC with an approved Lifeline compliance plan requires Commission approval in advance of the transaction.⁵ This includes renewing compliance plan approval for changes in the corporate ownership and control of the ETC.⁶

In accordance with this requirement, Global Connection submitted an amended compliance plan for both its wireline and wireless Lifeline services for Bureau approval.⁷ Global Connection has previously-approved wireline and wireless compliance plans⁸ and currently provides resold wireline

¹ See Global Connection Inc. of America Revised Wireline and Wireless Compliance Plan, WC Docket No. 09-197, 11-42 (filed Apr. 16, 2018) (*Global Connection Compliance Plan*).

² See *Lifeline and Link Up Reform and Modernization et al*, 27 FCC Rcd 6656, 6816, paras. 379-380 (2012) (*2012 Lifeline Reform Order*); *In the Matter of Lifeline & Link Up Reform & Modernization*, 30 FCC Rcd 7818 (2015) (*2015 Lifeline Order*).

³ 47 U.S.C. § 214(e)(1)(A).

⁴ See *2012 Lifeline Reform Order*, 27 FCC Rcd at 6814, 6819, paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *2012 Lifeline Reform Order*. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, 27 FCC Rcd 2186 (WCB 2012).

⁵ *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Universal Service Support*, Public Notice, 29 FCC Rcd 9144, 9145 (WCB 2014) (*2014 ETC Public Notice*).

⁶ *Id.*

⁷ See *Global Connection Compliance Plan*.

⁸ See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom, and Total Call*, Public Notice, 27 FCC Rcd 5776 (WCB 2012); *Wireline Competition Bureau Approves the Wireline Compliance Plans of*

Lifeline service in twenty-six states and wireless Lifeline service in twenty-six states and territories.⁹ Global Connection is a wholly-owned subsidiary of Global Connection Holdings Corporation (Global Holdings).¹⁰ Odin Mobile LLC has entered into a purchase agreement to acquire a majority ownership interest in Global Holdings.¹¹ Pursuant to the terms of the agreement, Odin Mobile will acquire 75 percent of Global Holdings' stock.¹² Global Holdings will retain the remaining minority ownership interest.¹³

The Bureau has reviewed Global Connection's combined wireline and wireless compliance plan for conformance with the relevant requirements, and now approves the compliance plan. We note that with respect to this matter, Global Connection will remain the only entity with an approved compliance plan. Additionally, Global Connection must continue to comply with any future additions to or amendments of the Lifeline program rules unless it has relinquished its relevant designation(s) pursuant to section 214(e)(4) of the Act.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Christian Hoefly, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-3607.

- FCC -

(Continued from previous page) _____
Global Connection and Phone Club Corporation, Public Notice, 31 FCC Rcd 8860 (WCB 2016).

⁹ *Global Connection Compliance Plan*, at 3. The twenty-six wireline states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. The twenty-six wireless states and territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

¹⁰ *Global Connection Compliance Plan*, at 3.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

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April 30, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On March 8, 2012, Global Connection Inc. of America (“Global Connection”) submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ On April 10, 2012, Global Connection submitted a revised version with a minor revision to its Model Application/Certification Form, included as Exhibit A to its Compliance Plan. Based on a meeting with Commission staff, Global Connection has further revised and supplemented its compliance plan.

Global Connection has revised its Compliance Plan to: 1) confirm in footnote 3 that Global Connection will follow the requirements of its Compliance Plan in all states where it provides Lifeline service and receives reimbursements from the federal Low-Income fund; 2) provide additional detail regarding Global Connection’s enrollment process, Company personnel training and potential fraud detection in Sections I.B. and I.F.; 4) provide additional detail regarding Global Connection’s handset activation policy in Section I.E.; and 5) revise the agent use box in the Application/Certification Form in Exhibit A.

¹ See *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 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 30, 2012
Page Two

Global Connection hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, Global Connection reiterates its request for expeditious approval of its Compliance Plan.

This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Kim Scardino
Divya Shenoy
Charles Tyler
Garnet Hanly
Alex Minard

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

| | |
|---|----------------------|
| In the Matter of | |
| Telecommunications Carriers Eligible to Receive Universal Service Support | WC Docket No. 09-197 |
| Lifeline and Link Up Reform and Modernization | WC Docket No. 11-42 |
| Global Connection Inc. of America | |

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.²

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Stand Up Wireless (dba), and Global Connection Holdings Corporation (holding company). This Compliance Plan applies only to Global Connection’s wireless Lifeline service offerings.

² See *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 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

Lifeline customers. Global Connection will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.³

Global Connection will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.⁴ This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Global Connection will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the low income fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company’s Lifeline service plan offerings.

³ See *Lifeline Reform Order*, ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

⁴ In addition, this Compliance Plan is consistent with the compliance plan filed by Cricket Communications, Inc. See Notice of *Ex Parte* Communication of Cricket Communications, Inc., WC Docket No. 09-197 (Sept. 23, 2011) (“Cricket Compliance Plan”). The Wireline Competition Bureau approved the Cricket Compliance Plan on February 7, 2012. See *Telecommunications Carriers Eligible for Universal Service Support, Cricket Communications, Inc. Petition for Forbearance*, WC Docket No. 09-197, Order, DA 12-158 (Feb. 7, 2012).

ACCESS TO 911 AND E911 SERVICES⁵

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.⁶ The Company will comply with these conditions starting on the effective date of the *Lifeline Reform Order*.

The Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint and Verizon Wireless as its underlying network provider/carrier. Sprint and Verizon Wireless route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers. To the extent that Sprint or Verizon Wireless is certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended.

⁵ See Compliance Plan Public Notice at 3.

⁶ See *Lifeline Reform Order*, ¶ 373.

Finally, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. The Company uses phones from BDI Logistics LLC that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE⁷

A. Policy

Global Connection will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules (when it becomes effective on June 1, 2012), as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a

⁷ See Compliance Plan Public Notice at 3.

household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

More than 90 percent of Global Connection's customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet. At such events, Global Connection requires all prospective customers to show a valid government-issued photo identification, which is electronically scanned to detect alterations. Each prospective customer is checked against Global Connection's internal database in real-time to ensure that the customer does not already receive a Lifeline benefit from the Company before the customer is enrolled.

As discussed in further detail in Section I.F. below, all employees or agents ("Company personnel") that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company

personnel will review documentation establishing eligibility pursuant to the Lifeline rules.⁸ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.⁹

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.¹⁰ Acceptable documentation of program eligibility includes: (1) the 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 (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.¹¹

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's

⁸ See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B); Cricket Compliance Plan at 4.

⁹ See Cricket Compliance Plan at 6.

¹⁰ See *Lifeline Reform Order*, ¶ 101.

¹¹ *Id.* and section 54.410(c)(1)(i)(B).

Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.¹²

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.¹³ The Company will not retain a copy of this documentation.¹⁴ Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection.¹⁵ In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.¹⁶

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹⁷ A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

¹² See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

¹³ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹⁴ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁵ See Cricket Compliance Plan at 6.

¹⁶ See *id.*

¹⁷ See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

C. Subscriber Certifications for Enrollment

Global Connection will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.¹⁸ The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally.¹⁹ Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.²⁰ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.²¹

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a

¹⁸ *Lifeline Reform Order*, ¶ 61; section 54.410(a).

¹⁹ *See Cricket Compliance Plan* at 3.

²⁰ *See Model Application/Certification Form*, included as Exhibit A. *See Compliance Plan Public Notice* at 3.

²¹ *See Lifeline Reform Order*, ¶ 123.

household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.²²

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.²³

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²⁴

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name;²⁵ (2) the applicant's full residential address (P.O. Box is not sufficient²⁶); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from

²² See *id.*, ¶ 121; section 54.410(d)(1).

²³ See section 54.405(c).

²⁴ See *Lifeline Reform Order*, ¶ 114.

²⁵ See Cricket Compliance Plan at 4.

²⁶ See *Lifeline Reform Order*, ¶ 87.

which the applicant, his or her dependents, or his or her household receives benefits;²⁷ and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁸

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,²⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service;³⁰ (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's

²⁷ See Cricket Compliance Plan at 4.

²⁸ See section 54.410(d)(2). See Cricket Compliance Plan at 4.

²⁹ See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

³⁰ See Cricket Compliance Plan at 4.

knowledge;³¹ (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.³² The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.³³

D. Annual Verification Procedures

Global Connection will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's

³¹ See *id.* at 5.

³² See *id.*

³³ See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.* See also Cricket Compliance Plan at 5.

knowledge, the subscriber's household is receiving no more than one Lifeline service.³⁴ Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.³⁵

2012 Verification. Global Connection will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.³⁶ The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

Verification De-Enrollment. Global Connection will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.³⁷ The Company will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

³⁴ See *Lifeline Reform Order*, ¶ 120 and Cricket Compliance Plan at 8.

³⁵ See *Lifeline Reform Order*, ¶ 145.

³⁶ See *id.*, ¶ 130.

³⁷ See *Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

E. Activation and Non-Usage

Global Connection will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.³⁸ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁹ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.⁴⁰

³⁸ See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

³⁹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3). See Cricket Compliance Plan at 2 (stating that it did not need to implement a non-usage policy because it offered only plans with unlimited local and long distance calling).

⁴⁰ See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴¹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.⁴²

In addition to checking the database when it becomes available, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers.⁴³ Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction.⁴⁴ All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and pass a Company issued exam. The training will be updated as needed, but at least every 90 days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters.

⁴¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁴² See Cricket Compliance Plan at 9.

⁴³ See *id.* at 6, 9.

⁴⁴ See *id.*

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁴⁵

One-Per-Household. Global Connection will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household⁴⁶ through the use of its application and certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company’s Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁴⁷ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission’s one-

⁴⁵ See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *id.*, ¶¶ 189-195; section 54.404(b)(6). Further, Company will update each subscriber’s information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

⁴⁶ A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

⁴⁷ See *Lifeline Reform Order*, ¶ 78 and Cricket Compliance Plan at 7.

per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁴⁸ Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, Global Connection will verify with the subscriber every 90 days that the subscriber continues to rely on that address.⁴⁹

Finally, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service,⁵⁰ (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) what documentation is necessary for enrollment; (7) Global Connection's name (the ETC); and (8) consumers who willfully make a false statement in order to

⁴⁸ *Id.*

⁴⁹ *See Lifeline Reform Order*, ¶ 89.

⁵⁰ *See Cricket Compliance Plan* at 4.

obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.⁵¹ These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.⁵² This specifically includes the Company's website (www.StandUpWireless.com) and outdoor signage.⁵³ A sample of the Company's marketing materials is included as Exhibit B.

G. Company Reimbursements From the Fund

To ensure that the Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁴ Further, the Company will transition the submission of its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month, and inform USAC, to the extent it deems necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.⁵⁵ In addition, the Company will keep accurate records as directed by USAC⁵⁶ and as required by new section 54.417 of the Commission's rules.

⁵¹ See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

⁵² *Id.*

⁵³ *Id.*

⁵⁴ See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

⁵⁵ See *Lifeline Reform Order*, ¶¶ 302-306.

⁵⁶ See section 54.407(e).

H. Annual Company Certifications

The Company will submit an annual certification to USAC, signed by a Global Connection officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁵⁷ (2) is in compliance with all federal Lifeline certification procedures;⁵⁸ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁵⁹

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁶⁰ Further, as discussed above, Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁶¹

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁶² the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁶³ The

⁵⁷ See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

⁵⁸ See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

⁵⁹ See section 54.416(a)(3).

⁶⁰ See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

⁶¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁶² See section 54.422(c).

⁶³ See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁶⁴ Finally, Global Connection will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.⁶⁵

I. Cooperation with State and Federal Regulators

Global Connection has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;⁶⁶
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

⁶⁴ See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

⁶⁵ See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

⁶⁶ The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁶⁷ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.⁶⁸

II. Description of Lifeline Service Offerings⁶⁹

Global Connection will offer its wireless Lifeline service in the states where it is designated as an ETC⁷⁰ and throughout the coverage area of its underlying provider(s) Sprint and Verizon Wireless. The Company’s Lifeline offering will provide customers with 100 anytime prepaid minutes per month, plus 100 anytime text messages, with rollover, at no charge. Additionally, the Company will offer a 250 anytime talk and text plan without rollover (one minute of talk time for each text). Lifeline customers can purchase additional bundles of minutes in denominations of \$5 (40 minutes), \$10 (100 minutes), \$20 (250 minutes), \$30 (500 minutes) and \$50 (1000 minutes). Airtime “top-up” minutes are available for purchase at the Company’s retail locations, through customer service and on its website. Text messaging is available at the rate of one minute of talk time per text message. Additional information regarding the Company’s plans, rates and services can be found on its website www.StandUpWireless.com.

In addition to free voice services, Global Connection’s Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All plans include domestic long-distance at no extra per minute charge.

⁶⁷ See section 54.405(e)(1).

⁶⁸ See Cricket Compliance Plan at 10.

⁶⁹ See Compliance Plan Public Notice at 3.

⁷⁰ Global Connection is currently designated as an ETC in Arkansas, Louisiana, Maryland, Missouri and West Virginia.

Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷¹

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷² The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April, 2011. The Company generates substantial revenues from non-Lifeline services and has access to capital from its investors. The majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Consequently, Global Connection has not relied, and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

⁷¹ See Compliance Plan Public Notice at 3.

⁷² See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁷³ Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁷⁴ The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, Global Connection 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

⁷³ Compliance Plan Public Notice at 3.

⁷⁴ 47 C.F.R. § 54.202(a)(1).

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.⁷⁵

IV. Conclusion

Global Connection submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



John J. Heitmann
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Suite 400
Washington, D.C. 20007
(202) 342-8544

*Counsel to Global Connection Inc. of
America*

April 30, 2012

⁷⁵ See *Lifeline Reform Order*, ¶ 230.

EXHIBIT A



Global Connection Inc. of America D/B/A StandUP Wireless
State Wireless Lifeline Service Application and Certification

Global Connection Inc. of America

Mail or fax form completed and signed form to:
Fax 1.888.878.9323 / Customer Service: 1.800.544.4441

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America D/B/A StandUP Wireless ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household 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 and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

- | | |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> National School Lunch Program's free lunch program |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines |

Customer Application Information:

First Name: _____ Middle Name: _____ Last Name: _____

Date of Birth: Month: ___ Day: ___ Year: _____ Last Four Digits of Social Security Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____

Home Telephone Number (if available): _____

Residential Address (P.O. Box NOT sufficient)

Number: _____ Apt: _____ Street _____ City _____

State: _____ Zip Code: _____

Address is (choose one): Permanent Temporary

Billing Address (if different from Residential Address) (P.O. Box IS sufficient)

Number: _____ Apt: _____ Street _____ City _____

State: _____ Zip Code: _____

Multiple households sharing and address:

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling **1.877.283.3890**. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

Additional certifications: I hereby certify, under penalty of perjury, that (Check the box next to each line):

- 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 within 30 days
- If I provided a temporary residential 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
- The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature: _____ **Date:** _____

| | |
|---|--|
| For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation): | |
| <p>Documents Acceptable Proof for Income-Eligibility (check 1):</p> <ul style="list-style-type: none"> <input type="checkbox"/> The prior year's state, federal, or Tribal tax return, <input type="checkbox"/> Current income statement from an employer or paycheck stub, <input type="checkbox"/> A Social Security statement of benefits, <input type="checkbox"/> A Veterans Administration statement of benefits, <input type="checkbox"/> A retirement/pension statement of benefits, <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or <input type="checkbox"/> A divorce decree, child support award, or other official document containing income information for at least three months time. | <ul style="list-style-type: none"> <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) <input type="checkbox"/> Supplemental Security Income (SSI) <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) <input type="checkbox"/> National School Lunch Program's free lunch program <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) <input type="checkbox"/> Tribally Administered TANF (TATNF) <input type="checkbox"/> Head Start (meeting income qualifying standards) <input checked="" type="checkbox"/> State Program 1 <input checked="" type="checkbox"/> State Program 2 |
| <p>Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):</p> <p><u>List A - Choose 1</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) <input type="checkbox"/> Medicaid | <p><u>List B - Choose 1:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Program participation card/document <input type="checkbox"/> Prior year's statement of benefits <input type="checkbox"/> Notice letter of participation <input type="checkbox"/> Other official document evidencing participation |
| Applicant Account Number | Agent/Dealer Number |
| | |

EXHIBIT B

FREE CELL PHONE FREE MINUTES & TEXTS

See reverse for more info!

250 MINUTES

EACH MONTH.
EVERY MONTH.



ALL qualifying customers get:

FREE Cell Phone & Activation

1.800.544.4441

www.StandUpWireless.com



Complaints concerning Lifeline/ Linkup service can be directed to the XXXXX Public Service Commission's Consumer Affairs Unit at 000-000-0000.

FREE CELL PHONE FREE MINUTES & TEXTS

See reverse for more info!

100 ANYTIME MINUTES 100 TEXT MESSAGES

EACH MONTH.
EVERY MONTH.

WITH ROLLOVER



ALL qualifying customers get:

FREE Cell Phone & Activation

1.800.544.4441

www.StandUpWireless.com



Complaints concerning Lifeline/ Linkup service can be directed to the XXXXX Public Service Commission's Consumer Affairs Unit at 000-000-0000.

FREE CELL PHONE FREE MINUTES & TEXTS

See reverse for more info!

1.800.544.4441

www.StandUpWireless.com



IMPORTANT LIFELINE WIRELESS SERVICE INFORMATION:

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. You must use your phone to continue to receive service.** Should you not use your service for 60 days you will be de-enrolled. **Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll.** Proof may consist of eligible program card or statement of benefits.

Global Connection Inc. of America

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AFFILIATE OFFICE
MUMBAI, INDIA

April 16, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Revised Wireless and Wireline
Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On February 22, 2017, Global Connection Inc. of America (Global Connection or Company) submitted for approval from the Wireline Competition Bureau (Bureau) an Amended Compliance Plan for both its wireline¹ and wireless² Lifeline services. Pursuant to discussions with Bureau staff, Global Connection hereby submits a revised version of its pending Amended Compliance Plan, updating the information provided therein to reflect the passage of time.

Current Wireless and Wireline Operations

As discussed in the Amended Compliance Plan, Global Connection currently provides

¹ The Company has an approved wireline Compliance plan, originally filed on June 26, 2012 and most recently revised on July 14, 2016. The Bureau approved Global Connection's wireline Compliance Plan on August 10, 2016. See *Wireline Competition Bureau Approves the Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 16-905 (rel. Aug. 10, 2016).

² The Company has an approved wireless Compliance Plan, originally filed on March 8, 2012 and most recently revised on April 30, 2012. The Bureau approved Global Connection's wireless Compliance Plan on May 25, 2012. See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

Marlene H. Dortch, Secretary
April 16, 2018
Page Two

wireless service in twenty-six (26) territories and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states. The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states, and on a wireless basis in all twenty-six (26) of its wireless service state territories.

Compliance Plan Updates Due to the Passage of Time

The proposed Amended Compliance Plan has been revised to update the details of Global Connection's wireline and wireless operations and Lifeline ETC designations (*see pp. 3-4*), customer service contact information (*see p. 13*) and financial and technical capability (*see pp. 26-31*). It also incorporates revisions to Company procedures and commitments throughout to reflect recent changes to Lifeline program rules. Global Connection provides updates regarding its handset policies (*see pp. 6-7*), its enrollment process, including changes to reflect enrollments using the National Verifier where available (*see pp. 7, 9, 10, 17*), explains its rolling annual recertification process (*see pp. 17-18*) and provides updates regarding means to ensure compliance with the one-per-household requirement (*see pp. 20-21*). In addition, the Amended Compliance Plan provides the Company's current wireline and wireless Lifeline service plan options (*see pp. 24-26*). Current exhibit materials for the Company's wireless and wireline Lifeline operations (sample enrollment forms, income eligibility worksheets, one-per-household worksheets, and marketing materials) are included.

Global Connection hereby submits its proposed Amended Compliance Plan with the above-described revisions. The Company respectfully reiterates its request for expeditious approval of its Amended Compliance Plan in order to ensure continued provision of wireline and wireless Lifeline services as discussed herein.

This letter and revised Amended Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 16, 2018
Page Three

Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Ryan Palmer
Jodie Griffin

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

| | |
|--|----------------------|
| In the Matter of | |
| Telecommunications Carriers Eligible to Receive Universal Service Support | WC Docket No. 09-197 |
| Lifeline and Link Up Reform and Modernization | WC Docket No. 11-42 |
| Global Connection Inc. of America | |

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plan outlining the measures it will take to comply with the Federal Communications Commission’s (“Commission’s” or “FCC’s”) Lifeline rules and implement the conditions imposed by the Commission in its Lifeline program rules and implementing orders and guidance.² On March 8, 2012, Global Connection filed a Compliance Plan

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its holding company as Global Connection Holdings Corporation (“Global Holdings”). Global Connection has no separate operating companies and no affiliates. Following the change in Global Connection’s majority ownership proposed herein, the Company’s corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies. Following the change in majority ownership, Global Connection will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless discussed in detail in Section III herein and Cintex Wireless, LLC, a Maryland limited liability company providing Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and wholesale wireless communications services.

² See *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 (Feb. 6, 2012) (“2012

for its wireless service. Global Connection's wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.³ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on July 14, 2016. Global Connection's wireline Compliance Plan was approved by the Wireline Competition Bureau ("Bureau") on August 10, 2016.⁴ On February 22, 2017, Global Connection filed a revised wireless Compliance Plan to reflect a proposed change in ownership of the Company, include Global Connection's wireline Lifeline services, and otherwise update the information provided therein. Global Connection files this revised Compliance Plan to further update the information provided herein due to the passage of time.⁵

Lifeline Reform Order"). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) ("*Compliance Plan Public Notice*"). See also *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) ("*2015 Lifeline Order*"); *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. 00-197, 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, "*2016 Lifeline Modernization Order*"); *Bridging the Digital Divide for Low-Income Consumers Lifeline and Link Up Reform and Modernization Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (2017) ("*2017 Lifeline Digital Divide Order*").

³ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

⁴ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

⁵ Global Connection also has a Petition for Eligible Telecommunications Carrier ("ETC") Designation in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia ("ETC Petition") pending at the Commission. See *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia* ("ETC Petition") WC Docket No. 09-197, filed April 4, 2012. This ETC Petition was subsequently amended on February 26, 2013 to update it in light of the Commission's rule changes affecting Lifeline-only ETCs. Global

Global Connection provides wireless service in twenty-six (26) territories⁶ and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states.⁷ The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states,⁸ and on a wireless basis in all twenty-six (26) of its wireless service territories.

Change in Ownership of Global Connection

As noted above, Global Connection is currently wholly-owned by Global Holdings. As described in Section III below, Global Holdings, Global Connection and Odin Mobile, LLC (“Odin Mobile”) have entered into an agreement pursuant to which Odin Mobile will acquire seventy five percent (75%) of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the majority interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority direct interest in Global Connection (twenty five percent (25%)). The transaction will not result in any loss or impairment of service for any customer.

Connection still seeks Lifeline-only designation for which the Commission is the proper designating authority, because the states lack the authority to perform such designation for wireless telecommunications service providers seeking designation.

⁶ Those twenty-six territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁷ Those twenty-six states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁸ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.⁹

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order and 2016 Lifeline Modernization Order, as well as with the Commission's Lifeline rules and policies more generally.¹⁰ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the Lifeline program rules and orders, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

⁹ See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹⁰ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

ACCESS TO 911 AND E911 SERVICES¹¹

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹² The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services. The Company will provide its wireless Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all of the Company's wireless customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining. All of the Company's wireline customers will have available access to emergency calling services at the time that Lifeline service is initiated. This 911 and E911 access will be available to those using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint, Verizon Wireless, AT&T and T-Mobile as its underlying network providers/carriers for its wireless services and AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers

¹¹ See Compliance Plan Public Notice at 3.

¹² See 2012 Lifeline Reform Order ¶ 373.

route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

For the Company's wireless service, to the extent that Global Connection's underlying providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. For the Company's wireless voice telephony service, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection's handsets provided in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models provided meet all 911 and E911 requirements. As a result, any existing wireless customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in Global Connection's Lifeline voice telephony service can choose to use their own device or receive one from Global Connection, which will be 911/E911-compliant. As discussed above, this requirement does not apply to Global Connection's wireline services.

To further obtain the benefits of a modernized Lifeline program, the 2016 Lifeline Modernization Order also set forth the requirement that Lifeline providers providing both mobile broadband services and devices to their consumers provide handset devices that are Wi-Fi enabled.¹³ The Commission further requires such providers to offer the choice to Lifeline customers of devices

¹³ See 2016 Lifeline Modernization Order ¶ 366.

that are equipped with hotspot functionality.¹⁴ Pursuant to the Lifeline rules, Global Connection will provide handset devices that are Wi-Fi enabled as well as the choice to consumers to acquire devices that are equipped with hotspot functionality as outlined in the 2016 Lifeline Modernization Order.¹⁵

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁶

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as amended by and through the 2016 Lifeline Modernization Order, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC. Applicants in states where the National Verifier is available will be enrolled after their eligibility has been determined by the National Verifier.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below one hundred-thirty five percent (135%) of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database ("NLAD"), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

¹⁴ See *id.* The 2016 Lifeline Modernization Order clarifies that the requirement to provide Wi-Fi-enabled handsets does not apply to Global Connection devices provided prior to the effective date of the rule (December 2, 2016).

¹⁵ See 2016 Lifeline Modernization Order ¶ 378. See also 47 C.F.R. § 54.408(f).

¹⁶ See Compliance Plan Public Notice at 3.

B. Eligibility Determination

For both wireless and wireline Lifeline services, customers can enroll in person by calling Global Connection's customer service center or online. For the Company's wireless service, more than ninety percent (90%) of customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet.

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (“TPIV”) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state or federal eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately forty percent (40%) of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly five hundred (500) active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁷

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁸ and the address is checked

¹⁷ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

¹⁸ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the 2015 Lifeline Order. *See* 2015 Lifeline Order ¶ 224, *supra* n. 2.

against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.¹⁹

All agents enrolling Lifeline customers for Global Connection have a portal login, which tracks the agent's activities²⁰ and allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers may also complete the Certification form through our Lifeline Interactive Voice Response Line and following the prompts. Customers will either fax, email or mail a copy of their eligibility proof and copy of government-issued identification.

Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility and government-issued identification.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification

¹⁹ See *infra* Section I.F. regarding use of the NLAD.

²⁰ Global Connection fully supports USAC's efforts to register agents for tracking in the NLAD and the National Verifier.

requirements in the Commission's rules and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases (including the National Verifier, once in place), Company personnel, who are non-commissioned employees, will collect documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal income-based and/or program-based criteria set forth in 47 C.F.R. § 54.409. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules. A Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on a request for reimbursement.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² In the absence of the National Verifier or a state eligibility database, acceptable documentation of program eligibility as defined by the Lifeline rules is reviewed by a Global Connection employee during the electronic order process. Acceptable documentation of program eligibility includes: (1) the current or prior year's

²¹ See 2012 Lifeline Reform Order ¶ 100; 2016 Lifeline Modernization Order ¶ 416. 47 C.F.R § 54.410(b)(1)(i)(B), 47 C.F.R § 54.410(c)(1)(i)(B).

²² See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

statement of benefits from a qualifying assistance program; (2) a notice or letter of participation in a qualifying assistance program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.²³

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months' time.²⁴ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.²⁵

Company personnel will examine this documentation for each Lifeline applicant, and comply with the requirement to retain and protect proof of eligibility.²⁶ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection. In the event that

²³ See 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

²⁴ See 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See *id.*

²⁶ See 2015 Lifeline Order ¶ 224 *supra* n. 2; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁷

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[I]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁸ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a non-commissioned Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on a request for reimbursement. The Company will therefore always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the

²⁷ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, FCC 05-165, ¶ 19 (2005).

²⁸ 2012 Lifeline Reform Order ¶ 110.

subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber thirty (30) days to demonstrate continued eligibility.²⁹ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

As required by the Commission's rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two (2) business days.³⁰ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-331-1059 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7 PM Eastern, Monday through Friday, and 10 AM to 2 PM Eastern on Saturday, excluding holidays.

C. Subscriber Certifications for Enrollment

Global Connection has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Commission's Lifeline rules, together with any additional state certification requirements.³¹ The Company shares the Commission's concern about abuse of the Lifeline program and is thus

²⁹ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³⁰ See 47 C.F.R. § 54.405(e)(5).

³¹ 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³² Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³³ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁴

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the

³² See Model Application/Certification Forms, included as **Exhibit A**. Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form by July 1, 2018. See *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) ("*Lifeline Form Public Notice*"). See also Compliance Plan Public Notice at 3.

³³ See Income Eligibility Worksheets, included as **Exhibit B**. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

³⁴ See 2012 Lifeline Reform Order ¶ 123.

Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.³⁵

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.³⁶

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁷); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁸

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to initial his or her acknowledgement, individually and under penalty of perjury, in

³⁵ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁶ See 47 C.F.R. § 54.405(c).

³⁷ See 2012 Lifeline Reform Order ¶ 87.

³⁸ See 47 C.F.R. § 54.410(d)(2).

writing or by electronic signature or interactive voice response recording,³⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within thirty (30) days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within thirty (30) days; (5) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (6) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (7) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (8) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴⁰ The applicant must also

³⁹ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.⁴¹

D. Annual Verification Procedures

Global Connection re-certifies all subscribers within 12 months after the subscriber's service initiation date and within every 12 months thereafter, except for subscribers in states where the National Verifier, state Lifeline administrator, or other state agency is responsible for the annual re-certification of subscribers' Lifeline eligibility in accordance with section 54.410(f). If the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases containing information regarding enrollment in qualifying assistance programs, then the Company obtains a signed certification from the subscriber on a form that meets the certification requirements in section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.⁴² Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.⁴³ By July 1, 2018, Global Connection will use the standardized form to re-certify a qualifying low-income consumer.⁴⁴

⁴¹ See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

⁴² See 2012 Lifeline Reform Order ¶ 120.

⁴³ See 2012 Lifeline Reform Order ¶ 145.

⁴⁴ See Lifeline Form Public Notice.

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within sixty (60) days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the sixty (60) days, the Company de-enrolls the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.⁴⁶

E. Activation and Non-Usage

For the Company's wireless Lifeline service, Global Connection will not consider a wireless prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.⁴⁷ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

⁴⁵ See revised 47 C.F.R. § 54.54.405(e)(4).

⁴⁶ Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

⁴⁷ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.407(c)(1).

In addition, after service activation, Global Connection will not seek reimbursement from the USF for and will de-enroll any subscriber that has not used Global Connection'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 15 days. In accordance with 47 C.F.R. § 54.405(e)(3), Global Connection 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. Global Connection will update the NLAD within one (1) business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

Global Connection's wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁴⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to

⁴⁸ See 2012 Lifeline Reform Order at ¶ 257; see also 47 C.F.R. §§ 54.404(b)(10) and 54.405(e)(3), respectively.

⁴⁹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

National Lifeline Accountability Database (NLAD). The Company complies with the requirements of the NLAD and section 54.404 of the Commission’s rules. As such, the Company queries the NLAD for every enrollment⁵⁰ to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁵¹

In addition to checking the NLAD, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every ninety (90) days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵²

⁵⁰ With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵¹ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber’s information in the NLAD within ten (10) business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

⁵² A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An

through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written document based on a USAC form containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁵⁴

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that

"economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵³ See 2012 Lifeline Reform Order ¶ 78.

⁵⁴ *Id.* Samples of Global Connection's one-per-household worksheet are attached as **Exhibit C**. The USAC Household Worksheet is available at http://www.usac.org/res/documents/li/pdf/forms/LI_Worksheet_nonNVstates.pdf. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁵ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁶ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁷ Samples of the Company's marketing materials are included as **Exhibit D**. In addition, the Company's application/certification forms will state 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.

G. Company Reimbursements from the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁸ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision

⁵⁵ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁶ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁷ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁸ See 2012 Lifeline Reform Order ¶ 128; 47 C.F.R. § 54.407(d).

of Lifeline support.⁵⁹ In addition, the Company will keep accurate records as directed by USAC⁶⁰ and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, providing the Company's business and affiliate information, terms and conditions of any voice telephony plans offered to Lifeline subscribers, and all other required information and certifications.⁶¹ The Company also submits an annual Form 555 filing to the Commission certifying, under penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) that the Company is in compliance with all federal Lifeline certification procedures; and (3) that the Company is in compliance with the minimum service levels set forth in 47 C.F.R. §54.408.⁶² The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, as amended, annually by January 31st, for its re-certification efforts of the previous year.⁶³

⁵⁹ See 47 C.F.R. § 54.407(a). Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶⁰ See 47 C.F.R. § 54.407(e).

⁶¹ See 47 C.F.R. § 54.422.

⁶² See 47 C.F.R. § 54.416(a).

⁶³ See 47 C.F.R. § 54.416(b).

II. Description of Lifeline Service Offerings⁶⁴

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁵ and throughout the coverage area of its respective, underlying provider(s). Global Connection’s Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408.

Global Connection has revised its Lifeline plans as of December 1, 2017 to comply with the applicable minimum standards set by the Commission. The Company’s current wireless Lifeline offering consists of the following plan options:

| Plan Name¹ | Voice Minutes Included in Plan | SMS Messages Included in Plan | Data MB Included in Plan | Voicemail Caller ID Call Waiting | Nationwide Long Distance Included | Cost Per Month |
|------------------------------|---------------------------------------|--------------------------------------|---------------------------------|---|--|-----------------------|
| StandUP 1 GB Data | 500 | Unlimited ² | 1 GB | YES | YES | Free |
| StandUP Basic | 750 | Unlimited ² | 100 MB | YES | YES | Free |

* 1 Text = 1 Minute

¹ Plan availability based on subscriber’s state of residence; not available in CA or NE. Visit www.StandUPwireless.com or call 1-800-544-4441 for more information.

² Stated pricing for service options do not include applicable state, federal and local taxes and surcharges.

In addition to allotments of voice, text and broadband services, Global Connection’s current wireless Lifeline offering includes a free handset and access to custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes, currently in the following increments:

⁶⁴ See Compliance Plan Public Notice at 3.

⁶⁵ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

| Direct Payment Retail Price | Total Credits Provided | Credits per Nationwide Call Minute | Credits per SMS Text Message |
|------------------------------------|-------------------------------|---|-------------------------------------|
| \$5 | 200 | 1 | 1 |
| \$10 | 450 | 1 | 1 |
| \$20 | 1000 | 1 | 1 |
| \$30 | 1500 | 1 | 1 |
| \$50 | 2500 | 1 | 1 |

| Additional Data Plans | Total MB Credits Provided |
|------------------------------|----------------------------------|
| \$3.95 | 250 MB |
| \$7.95 | 500 MB |
| \$15.95 | 1 GB |

Airtime “top-up” minutes are available for purchase through customer service and on its website. Additional information regarding the Company’s wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company’s wireline Lifeline offerings vary based on the Company’s underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and offers a Lifeline-discounted Basic Package⁶⁶ for \$20.70,⁶⁷ an Advantage Package⁶⁸ for \$25.70 and a Premium Package⁶⁹ for \$30.70 to eligible Lifeline customers. Global Connection resells CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁰ for \$32.95 and an Advantage Package⁷¹ for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia and North

⁶⁶ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁶⁷ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁶⁸ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁶⁹ The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷⁰ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

Carolina, and offers a Lifeline-discounted Basic Package⁷² for \$36.70 and an Advantage Package⁷³ for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁴ for \$36.70 and an Advantage Package⁷⁵ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any wireline service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website www.ConnectWithGlobal.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁶

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. § 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷⁷ Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

⁷² The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷³ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁴ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁵ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁶ See Compliance Plan Public Notice at 3.

⁷⁷ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services which represent the majority of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In addition, Global Connection has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to Global Connection through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement ("Agreement") dated February 16, 2017, by and among Odin Mobile, Global Holdings and Global Connection, Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary. A majority (ninety-nine percent (99%)) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁷⁸ Global Connection customers will continue to receive their existing services at the same or better rates, terms and conditions currently in effect.

Odin Mobile (FRN: 0022135131) is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless service, including to visually impaired consumers by using the T-Mobile USA ("T-Mobile") and Sprint wireless networks through the Mobile Virtual Network Enabler ("MVNE") Prepaid Wireless Wholesale, LLC ("PPWW"), which is owned by Paul Greene. Odin Mobile

⁷⁸ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

purchases wireless services (for voice minutes, text messages, mobile data, etc.) from PPWW, a Maryland limited liability company, on a wholesale basis, packages those services into Odin Mobile's own service plans and pricing, and bundles the wireless service with Odin Mobile's handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile currently provides wireless service in 49 states and Puerto Rico.⁷⁹ Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. Upon approval of the transaction, Odin Mobile will own 75% of Global Connection and plans to transfer all prepaid wireless operations to Global Connection.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC ("PWG"), an MVNE that supplies airtime through the T-Mobile network. PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator ("MVNO") market. PWG and PPWW have no foreign ownership and, like Global Connection, are not foreign carriers and are not affiliated with foreign carriers in any market. PWG is one of the nation's longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

⁷⁹ The only state in which Odin Mobile does not offer service is Alaska.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are inter-connected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator. Specifically, PWG’s network infrastructure and T-Mobile relationship enables PWG to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier’s ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.⁸⁰ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has

⁸⁰ Mr. Greene also owns interest in several other non-communications-related businesses.

held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of Global Connection's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸¹ Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸² Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸³ Global Connection's Lifeline

⁸¹ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit E**.

⁸² Compliance Plan Public Notice at 3.

⁸³ See 47 C.F.R. § 54.202(a)(1).

supported voice services will meet the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated on an annual basis. Global Connection'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 on an annual basis. To the extent Global Connection 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 Global Connection will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

The Company provides all of the communications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include broadband Internet access service ("BIAS"), a supported service as of December 2, 2016, as well as voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set number of minutes of use at no charge to the customer, and can be used for local and domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services and handsets (when applicable).

Finally, Global Connection will not provide toll limitation service (“TLS”) for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. 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 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸⁴

The Company’s Lifeline wireline offerings include unlimited local calling and plans include prepaid long distance minutes. All wireline customers can purchase additional domestic long distance – unlimited for \$10.00, or 250 minutes for \$5.00. Wireline customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection’s long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this amended Compliance Plan is essential to allow Global Connection to consummate the ownership change as described herein, and demonstrably strengthen the Company’s operating capabilities to

⁸⁴ See 2012 Lifeline Reform Order ¶ 230.

the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



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*Attorneys for Global Connection Inc. of
America*

April 16, 2018

Exhibit A

Model Application/Certification Form

A-1 Wireless

A-2 Wireline

A-1 Wireless



Lifeline Enrollment Application

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in StandUP Wireless's Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household 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 and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

I hereby certify, under penalty of perjury, that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer eligibility certification:

I hereby certify that I participate in at least one of the following programs:

- Supplemental Nutrition Assistance Program (SNAP)
- Federal Public Housing Assistance (FPHA)
- Medicaid (Not Medicare)
- Federal Veteran's and Survivors Benefit
- Income at or below 135% of Federal Poverty Guidelines
- Supplemental Security Income (SSI)

Personal Information:

First Name: _____ Middle Name: _____ Last Name: _____

DOB Month: _____ Day: _____ Year: _____ Last Four SSN (or Tribal ID#): _____

Residential Address (May not be a PO Box) _____ Contact Number (if available): _____

Street address: _____ Apt: _____

City: _____ State: _____ Zip Code: _____

This address is (choose one): Permanent Temporary

Billing Address (if different from Above) (P.O. Box is permitted)

Street address: _____ Apt: _____

City: _____ State: _____ Zip Code: _____

Multiple households sharing an address:

- I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by dialing 611 from your handset. To keep your account active, you must use your Lifeline service at least once during any 30-day period by completing an outbound call, sending a text message, using your mobile broadband connection, purchasing additional minutes or data from Company, answering an in-bound call from someone other than the Company, or by responding to a direct contact from the Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 30 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 15-day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

- I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

- I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (name, telephone number, address, date of birth, last 4 digits of SSN, or Tribal ID Number, amount of support being sought, means of qualification for support, and dates of service initiation and termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- I understand I have the right to enroll in the Lifeline service using non-electronic methods. I further understand that I have the right to withdraw this consent at any time prior to activation of my service. The Company has advised me that I may request a paper copy of my contract and associated fees by calling 611 from my wireless handset.
- I hereby authorize the Company to send text messages to my Company provided wireless number about my Lifeline benefit. Text messages sent by the Company will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than the Company.
- I acknowledge that I am providing the information I have included in this application to CGM, LLC and further authorize CGM, LLC to receive and use my information for enrollment verification and waste, fraud and abuse mitigation purposes. Additionally, I authorize CGM to receive and use my historic Lifeline enrollment information for enrollment verification and waste, fraud and abuse mitigation purposes.

Additional certifications: I hereby certify, under penalty of perjury, that (initial next to each statement to which you certify):

- ___ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required.
- ___ I hereby certify that I participate in the program selected above.
- ___ 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 Residential Address listed above 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 within 30 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 will result in de-enrollment and the termination of my Lifeline benefits
- ___ The information contained in this certification form is true and correct to the best of my knowledge
- ___ I hereby certify under penalty of perjury that I do NOT reside on Federal-recognized Tribal lands
- ___ I certify that the individual named on the documentation used to demonstrate program participation or income eligibility is part of my household.

- ___ I certify that the individual named on the documentation used to demonstrate program participation or income eligibility is not already receiving a Lifeline subsidy.
- ___ I certify that my household will receive only one Lifeline service and, to the best of my knowledge, no one in my household, including myself, is receiving a Lifeline-supported service from any other landline or wireless service provider.
- ___ If StandUP Wireless finds that I am already receiving a Lifeline discount benefit from another provider, I agree that I want to transfer my Lifeline discount benefit from that Lifeline provider to StandUP Wireless. I understand that once the transfer is complete, I will lose my Lifeline Program benefit with any other Lifeline provider from which I am currently receiving a Lifeline discount. StandUP Wireless has explained to me and I understand that I may not have multiple Lifeline Program benefits with the same or different providers.
- ___ By my signature immediately below, I hereby certify, under penalty of perjury, that the information included in this certification form is true and correct to the best of my knowledge.

Applicant's Signature: _____ Date: _____

Applicant
Account
Number:

Agent/Dealer
Number:

A-2 Wireline

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household 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 and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

- | | |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Federal Veteran's and Survivors Benefit |
| <input type="checkbox"/> Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines |
| <input type="checkbox"/> Medicaid (Not Medicare) | <input type="checkbox"/> Supplemental Security Income (SSI) |

Customer Application Information:

First Name _____ Middle Name _____ Last Name _____

Date of Birth: Month: _____ Day: _____ Year: _____ Last Four Digits of Social Security Number or Tribal ID Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____ Home Telephone Number (if available) : _____

Residential Address (P.O. Box NOT sufficient) Address is (choose one): Permanent Temporary Contact Number _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) Email: _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Multiple households sharing an address:

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses and I will complete a separate additional form.

Letter of Authorization: This letter is a written authorization, to designate Global Connection Inc. of America to act as my agent in order to change the following: long distance carrier from my current telecommunications carrier to Global Connection Inc. of America long distance service, local exchange carrier from my current telecommunications carrier to Global Connection Inc. of America, I am authorized to request changes on this account. I further understand that there may be a charge for each provider change and could involve a charge for the changing back to the original primary carrier. Subscribers selecting the electronic signature option and or the IVR (Interactive Voice Response) to be considered a "writing", any name or symbol of subscriber affixed to or contained in the electronic Letter of Authorization shall be deemed to be the Subscriber's valid signature expressing intent to be bound to this Letter of Authorization and the applicable tariffs.

Authorizations:

I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (name, telephone number, address, DOB, last four digits of SSN or Tribal ID number, amount of support sought, means of qualifications, dates of service initiation/termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

If Qualifying person is different:

Name of qualifying individual: _____

The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

Additional certifications. I hereby certify, under penalty of perjury, that (Initial next to each line):

- ___ I hereby certify, under penalty of perjury, that I have read and understand the disclosures listed above, and that to the best of my knowledge, my household is not already receiving a Lifeline service benefit.
- ___ I hereby certify under penalty of perjury, that if I am already receiving a Lifeline discount benefit from another provider, I agree that I want to transfer my Lifeline discount benefit from that Lifeline provider to Global Connection Inc of America. I understand that once the transfer is complete, I will lose my Lifeline Program benefit with any other Lifeline provider from which I am currently receiving a Lifeline discount. I understand that I may not have multiple Lifeline Program benefits with the same or different provider.
- ___ 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 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 within 30 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 60 days will result in de-enrollment and the termination of my Lifeline benefits.
- ___ The information contained in this certification form is true and correct to the best of my knowledge.

Applicant's Signature: _____

Date: _____

Applicant Account Number: _____

Agent/Dealer Number: _____

Exhibit B

Income Eligibility Worksheet

B-1 Wireless

B-2 Wireline

B-1 Wireless

Lifeline Federal Poverty Limit Guidelines

Qualifying individuals are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

| HOUSEHOLD SIZE | INCOME LEVEL |
|---------------------------------|--------------|
| 1 | \$16,389 |
| 2 | \$22,221 |
| 3 | \$28,053 |
| 4 | \$33,885 |
| 5 | \$39,717 |
| 6 | \$45,549 |
| 7 | \$51,381 |
| 8 | \$57,213 |
| For each additional person, add | \$5,832 |

Effective 1/1/2018

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- The prior year's state, federal, or Tribal tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document
- If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months

IMPORTANT

LIFELINE WIRELESS SERVICE INFORMATION:

This is a Lifeline service. Lifeline is a government assistance program. Your Lifeline Benefit is non-transferable. Proof of eligibility is required and only eligible customers may enroll. Only one Lifeline discount per household. Consumers who willfully make a false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment or being barred from the program. Plans include 750 Anytime Minutes, Unlimited SMS, and 100 MB of data each month of service, as well as a discount off of any premium plan.

LIFELINE ELIGIBILITY CRITERIA

Please check your eligibility on the list below

Program Eligibility : Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Veteran Pension and Survivors Benefit; Medicaid

Income Based Eligibility
 Income at or below 135% of Federal Poverty Limits

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities Commission
 Consumer Affairs at
 303-894-2070 or
 800-456-0858

Georgia Public Service Commission's
 Consumer Affairs
 Unit at 404-656-4501
 or 800-282-5813

Kansas Commission's
 Office of Public Affairs
 and Consumer
 Protections at
 785-271-3140 or
 800-662-0027
 TDD 800-766-3777

Massachusetts
 Consumer Division
 Dept. of
 Telecommunications &
 Cable 617-305-3531 or
 800-392-6066

Visit www.StandUPWireless.com for complete terms & conditions

Global Connection Inc. of America d/b/a/ StandUP Wireless

B-2 Wireline

Lifeline Federal Poverty Limit Guidelines

Qualifying individuals are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines.** This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

| HOUSEHOLD SIZE | INCOME LEVEL |
|---------------------------------|--------------|
| 1 | \$16,389 |
| 2 | \$22,221 |
| 3 | \$28,053 |
| 4 | \$33,885 |
| 5 | \$39,717 |
| 6 | \$45,549 |
| 7 | \$51,381 |
| 8 | \$57,213 |
| For each additional person, add | \$5,832 |

Effective 1/1/2018

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- The prior year's state, federal, or Tribal tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document
- If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months

IMPORTANT

LIFELINE WIRELINE SERVICE INFORMATION:

This is a Lifeline service. Lifeline is a government assistance program. Your Lifeline Benefit is non-transferable. Proof of eligibility is required and only eligible customers may enroll. Only one Lifeline discount per household. Consumers who willfully make a false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment or being barred from the program. Basic Plan includes Caller ID and Call Waiting (prices and packages start at \$20.70, and vary by underlying provider).

LIFELINE ELIGIBILITY CRITERIA

Please check your eligibility on the list below

Program Based Eligibility:
Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)
Supplemental Security Income (SSI)
Federal Public Housing Assistance (Section 8)
Veteran Pension and Survivors Benefit
Medicaid

Income Based Eligibility

Income at or below 135% of Federal Poverty Limits

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities Commission
Consumer Affairs at 303-894-2070 or 800-456-0858

Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 800-282-5813

Kansas Commission's Office of Public Affairs and Consumer Protection at 785-271-3140 or 800-662-0027

Massachusetts Consumer Division Dept. of Telecommunications & Cable 617-305-3531 or 800-392-6066

Exhibit C

One-Per-Household Worksheet

C-1 Wireless
C-2 Wireline

C-1 Wireless



Lifeline Household Worksheet

| | |
|------------------|--|
| Name | |
| Address | |
| | |
| Telephone Number | |

Lifeline is a federal government benefit program that provides a monthly discount on telephone (home, i.e., landline phone, or mobile) or broadband service. Only ONE Lifeline discount per household is allowed under federal law. Members of a household are not permitted to receive Lifeline service from multiple service providers. Answer the following questions on this page to determine if there is more than one household living at your address, and if your household already receives a Lifeline Program benefit.

Providing false information on this form may result in losing your Lifeline Program-supported service and possible criminal penalties.

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you). Members of a household are not permitted to receive more than one Lifeline Program-supported service.

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

1. Do you live with another adult?

Adults are people who are 18 years old or older, or who are emancipated minors. This can include a spouse, domestic partner, parent, adult son or daughter, adult in your family, adult roommate, etc.

_____ YES _____ NO

- If YES, answer question 2
- If NO, You can apply for Lifeline. You live in a household that does not get Lifeline yet. Please initial line B below, and sign and date the worksheet.

2. Do they get Lifeline?

_____ YES _____ NO

- If YES, answer question 3
- If NO, **You can apply for Lifeline.** You live in a household that does not get Lifeline yet. Please initial line B below and and sign and date the worksheet.

3. Do you share money (income and expenses) with them?

This can be the cost of bills, food, etc., and income. If you are married, you should check yes for this question.

_____ YES _____ NO

- If YES, **You do not qualify for Lifeline** because someone in your household already gets the benefit. You are only allowed to get one Lifeline discount per household, not per person.
- If NO, **You can apply for Lifeline.** You live at an address with more than one household and your household does not get Lifeline yet. Please initial lines A and B below, and sign and date the worksheet.

AGREEMENT

Please initial the agreement below and sign and date this worksheet. Submit this worksheet to your service provider with your Lifeline Program Application Form.

- A. _____ I live at an address with more than one household.
- B. _____ I understand that the one-per-household limit is a Federal Communications Commission (FCC) rule and I will lose my Lifeline benefit if I break this rule.

Applicant's Signature: _____ Date: _____

C-2 Wireline



Lifeline Household Worksheet

| | |
|------------------|--|
| Name | |
| Address | |
| Telephone Number | |

Lifeline is a federal government benefit program that provides a monthly discount on telephone (home, i.e., landline phone, or mobile) or broadband service. Only ONE Lifeline discount per household is allowed under federal law. Members of a household are not permitted to receive Lifeline service from multiple service providers. Answer the following questions on this page to determine if there is more than one household living at your address, and if your household already receives a Lifeline Program benefit.

Providing false information on this form may result in losing your Lifeline Program-supported service and possible criminal penalties.

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you). Members of a household are not permitted to receive more than one Lifeline Program-supported service.

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

1. Do you live with another adult?

Adults are people who are 18 years old or older, or who are emancipated minors. This can include a spouse, domestic partner, parent, adult son or daughter, adult in your family, adult roommate, etc.

YES NO

➤ If YES, answer question 2

➤ If NO, You can apply for Lifeline. You live in a household that does not get Lifeline yet. Please initial line B below, and sign and date the worksheet.

2. Do they get Lifeline?

YES NO

➤ If YES, answer question 3

➤ If NO, **You can apply for Lifeline.** You live in a household that does not get Lifeline yet. Please initial line B below and and sign and date the worksheet.

3. Do you share money (income and expenses) with them?

This can be the cost of bills, food, etc., and income. If you are married, you should check yes for this question.

YES NO

➤ If YES, **You do not qualify for Lifeline** because someone in your household already gets the benefit. You are only allowed to get one Lifeline discount per household, not per person.

➤ If NO, **You can apply for Lifeline.** You live at an address with more than one household and your household does not get Lifeline yet. Please initial lines A and B below, and sign and date the worksheet.

AGREEMENT

Please initial the agreement below and sign and date this worksheet. Submit this worksheet to your service provider with your Lifeline Program Application Form.

A. I live at an address with more than one household.

B. I understand that the one-per-household limit is a Federal Communications Commission (FCC) rule and I will lose my Lifeline benefit if I break this rule.

Applicant's Signature: _____ Date: _____

Exhibit D

Marketing Materials

D-1 Wireless

D-2 Wireline

D-1 Wireless

standup
WIRELESS

FREE*

CELL PHONE
& FREE ACTIVATION

CALL US TODAY:
800-544-4441

This is a Lifeline service. Lifeline is a government assistance program. Your Lifeline Benefit is non-transferable. Proof of eligibility is required and only eligible customers may enroll. Only one Lifeline discount per household. Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or being barred from the program. Plans include 750 Anytime Minutes, Unlimited SMS, and 100 MB of data each month of service, as well as a discount off of any premium plan.

Global Connection Inc. of America d/b/a/ StandUP Wireless.

Visit www.StandUPWireless.com for complete terms & conditions

D-2 Wireline

Real
HOME
PHONE
SERVICE™
www.RealHomePhone.com

Service provided by Global Connection Inc. of America

**SAY HELLO TO
REAL HOME PHONE
BIG \$SAVINGS\$**



CALL US TODAY: 1-877-511-3009

This is a Lifeline service. Lifeline is a government assistance program. Your Lifeline Benefit is non-transferable. Proof of eligibility is required and only eligible customers may enroll. Only one Lifeline discount per household. Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or being barred from the program. Basic Plan includes Caller ID and Call Waiting (prices and packages start at \$20.70, and vary by underlying provider).

Global Connection Inc. of America. Visit www.RealHomePhone.com for complete terms & conditions.

Exhibit E

Georgia Public Service Commission Order

COMMISSIONERS:

LAUREN "BUBBA" McDONALD, JR., CHAIRMAN
STAN WISE
ROBERT B. BAKER, JR.
CHUCK EATON
H. DOUG EVERETT



FILED

DEC 28 2010

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

EXECUTIVE SECRETARY
G.P.S.C. REECE McALISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 656-4501
(800) 282-5813

244 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341
www.psc.state.ga.us

DOCKET# 9322
DOCUMENT# 133041

Docket No. 9322

IN RE: Application of Global Connection, Inc. for Certificate of Authority to Provide Local Exchange Service

ORDER ADOPTING CONSENT ORDER

This matter comes before the Georgia Public Service Commission ("Commission") to consider the proposed Consent Order (Attachment "A") between the Commission Staff and Global Connection, Inc. ("Global Connection").

JURISDICTION

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to

exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

Background

1.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders. These violations are detailed in the Consent Order that is attached as Exhibit A to this Order. A summary of these violations is provided below.

2.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund.

3.

Staff also determined that Global Connection charged a late fee in excess of the amount permitted in its Commission-approved tariff to an estimated 5,500 customers in Georgia.

4.

Finally, Staff determined that, beginning in or before July, 2008, the customer bills issued by Global Connection included a processing fee associated with switching carriers or terminating service that was inconsistent with the provisions of its Commission-approved tariff.

5.

To resolve these violations, Global Connection entered into a Consent Order with the Commission Staff in which it agreed to pay a civil penalty in the amount of \$55,000.00. Under the terms of the Consent Order, Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

6.

Also, to resolve these violations, beginning with its next billing cycle, Global Connection agreed to make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1.

After considering the proposed Consent Order, the Commission finds and concludes that the terms and conditions of the Stipulation are reasonable. The Commission finds that the amount of the civil penalty is reasonable, in light of the totality of the facts set forth in the Consent Order. The appropriate amount of a civil penalty involves judgment, and may be specific to the facts of the particular case. The penalty provided for in the Consent Order is sufficient to preserve the integrity of the Commission's rules, orders and administration of Georgia law.

2.

The record in this case shows that for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund ("UAF"). (Consent Order, ¶ 6). This action violates O.C.G.A. § 46-5-167(g), which provides that "A local exchange company or other company shall not establish a surcharge on customers' bills to collect from customers' contributions [to the UAF]." The Commission administers this statute. O.C.G.A. §§ 46-5-162(4) and 46-5-167.

3.

The record also shows that Global Connection recovered from an estimated 5,500 customers a late penalty of \$10.00. (Consent Order, ¶¶ 8, 10). The Commission-approved tariff sets a maximum late penalty of 1.5 percent of the past due amounts. *Id.* at ¶ 7. The monthly charge for Global Connection's service is approximately \$50.00. *Id.* at ¶ 9. The Commission finds that the late fee Global Connection recovered from these customers exceeded the late fee set forth in the Company's applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

4.

Finally, the facts show that Global Connection's customer bills stated that a \$25.00 processing fee applied in the event that a customer switched to another carrier or disconnected service. (Consent Order, ¶ 12). However, Section 2.13 of Global Connection's Commission-approved local service tariff does not authorize the imposition of this processing fee in those instances in which a customer cancels service after service has been installed. The Commission concludes that the customer bills do not comply with the applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

The Commission also finds that it is reasonable to require Global Connection to modify its customer bills to comply with the Commission-approved tariff beginning with the next billing cycle.

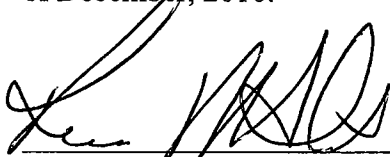
WHEREFORE IT IS ORDERED, that the Commission hereby adopts as an Order of this Commission, the Consent Order signed by the Commission Staff and Global Connection dated December 13, 2010, and attached as "Exhibit A" to this Order.

ORDERED FURTHER, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

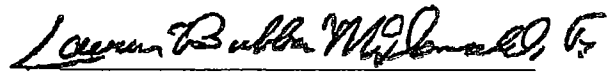
ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 21st day of December, 2010.



Reece McAlister
Executive Secretary



Lauren "Bubba" McDonald, Jr.
Chairman

12-22-10
Date

12-22-10
Date

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

FILED

DEC 13 2010

IN RE: **Application of Global Connection, Inc. for Certificate of Authority to
Provide Local Exchange Service**

EXECUTIVE SECRETARY
G.P.S.C.

CONSENT ORDER

The Staff of the Georgia Public Service Commission and Global Connection, Inc. (“Global Connection”) hereby agree to present the following proposed disposition of the violations detailed herein to the Commission.

BACKGROUND AND LEGAL AUTHORITY

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

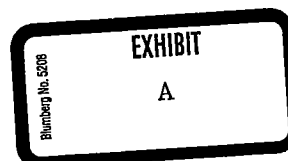
Global Connection is a “telecommunications company” as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia’s Telecommunications and Competition Development Act of 1995 (“Telecom Act”), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

4.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global’s application, the Commission Staff discovered three violations of Georgia law and Commission orders.



5.

Pursuant to the Telecom Act, the Commission created a Universal Access Fund “to assure the provision of reasonably priced access to basic local exchange services throughout Georgia.” O.C.G.A. § 46-5-167(a). All certified telecommunications companies in Georgia are required to make quarterly contributions to the fund. O.C.G.A. § 46-5-167(b). Companies are prohibited from establishing a surcharge on customers’ bills to collect this contribution from customers. O.C.G.A. § 46-5-167(g).

6.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund. This action by Global Connection violated O.C.G.A. § 46-5-167(g).

7.

Section 2.15 of Global Connection’s Commission-approved local service tariff is entitled “Late Payment Charge.” This section states that “Invoices more than thirty (30) days past due will incur a monthly finance charge on the unpaid balance at a rate equal to the lesser of one and one-half percent (1.5%) per month or the maximum rate permitted by applicable Regulation.”

8.

The Commission Staff found that, for at least the time period of July, 2008 through August 2010, bills issued by Global Connection to its customers in Georgia stated that “[a] \$10.00 Late Fee Will Be Applied to Accounts When Payment Is Not Posted By Due Date.”

9.

The monthly charge a customer receiving local telecommunications service from Global Connection is approximately \$50.00. Therefore, the late fee that Global Connection included on its customer bills significantly exceeded the late fee permitted pursuant to its Commission-approved tariff.

10.

Based on discovery responses and discussions between Staff and Global Connection, the parties estimate that Global Connection collected the excessive late fee from about 5,500 customers in Georgia.

11.

Section 2.13 of Global Connection’s Commission-approved local service tariff states that “Customers who cancel a Service Order prior to Service installation (including without limitation cancellation of special construction or Services provided on an individual case basis will incur a

charge equal to the greater of (i) the non-recurring charges for the MSP, or (ii) the company's reasonably incurred, actual expenses associated with such cancellation."

12.

Beginning in or before July, 2008, Global Connection's bills issued by Global Connection to its customers in Georgia stated that "If this invoice is **PAID IN FULL**, [Global Connection] will issue a refund in the event of switching to another carrier or disconnection occurs prior to Bill Due Date, **minus a \$25 processing fee.**" (emphasis in original).

13.

Global Connection's Commission-approved local service tariff does not authorize the imposition of the processing fee described in paragraph 12 in those instances in which a customer cancels service after service has been installed. Therefore, the customer bills do not comply with the Commission-approved tariff.

AGREEMENT

The parties to this Consent Agreement are desirous of resolving this matter and believe that it is in the public interest to do so under the terms and conditions described herein. The undersigned parties hereby agree that this matter should be disposed of as follows:

1.

This Consent Agreement, if approved by the Commission, shall constitute a Final Order resolving the violations discussed herein. The parties agree that they will abide by the terms of the Consent Agreement.

2.

The Consent Agreement shall not become effective until approved without modification by the Commission. This Consent Agreement shall be void and of no effect whatsoever if it is not approved in its entirety by action of the Commission.

3.

Global Connection agrees to pay to the Commission in certified funds a civil penalty in the amount of \$55,000.00. Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

4.

Beginning with its next billing cycle, Global Connection shall make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

5.

By entering into this Consent Agreement, Global Connection does not waive any notice, right, hearing, claim or defense with regard to any future action brought against it by the Commission or by any other person.

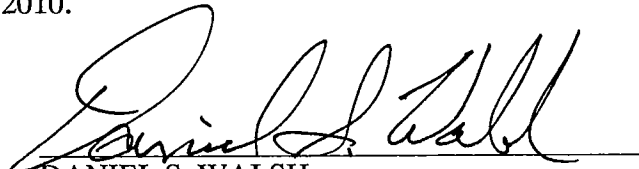
6.

Nothing in this Consent Agreement shall be construed to relieve Global Connection from its responsibility to comply with the terms and conditions of its Certificates of Authority, the rules and regulations of the Commission, and the laws of the State of Georgia.

7.

Each of the undersigned acknowledges that he has read this Consent Agreement and understands its contents. Each of the undersigned acknowledges that the party he or she represents freely, knowingly and voluntarily enters into this consent Agreement. Each of the undersigned parties hereby consents to the resolution of this proceeding as provided.

Agreed to this 13th day of December 2010.


DANIEL S. WALSH
Senior Assistant Attorney General


GLOBAL CONNECTION, INC.

EXHIBIT 4

Sample Advertisement



Unlimited Talk, Text and Data[†]

Free every month when you bundle your Lifeline and ACP Benefits (\$40 Savings)



Tablets available for as low as \$10.01 for those that qualify.

Need Lifeline or ACP not bundled together?

Free Lifeline Only Plan Includes:

1,000 Minutes, Unlimited Text & 4.5 GB of High-Speed Data

Free ACP Only Plan Includes:

Unlimited Talk, Text and Data[†] with 5 GB of High-Speed Data

Plan Includes: Unlimited Talk, Text & 10 GB of High-Speed Data – 5G/4G LTE plus Unlimited Additional Data[†]

You can select any available service plan by signing up at standupwireless.com or you can update your existing service plan by logging into My Account at any time.

| Retail Price | Price to You* | Plan |
|--------------|---------------|--|
| \$30 | FREE | Unlimited Talk, Text & Data [†] with 5 GB of High-Speed Data |
| \$40 | FREE | Unlimited Talk, Text & Data[†] with 10 GB of High-Speed Data |
| \$50 | \$10 | Unlimited Talk, Text & Data [†] with 12 GB of High-Speed Data |
| \$60 | \$20 | Unlimited Talk, Text & Data [†] with 16 GB of High-Speed Data |
| \$75 | \$35 | Unlimited Talk, Text & Data [†] with 25 GB of High-Speed Data |
| \$110 | \$70 | Unlimited Talk, Text & Data [†] with 60 GB of High-Speed Data |

BEST VALUE

Price to You is applicable when you apply for both Lifeline and ACP. Customer signing up for ACP only will receive \$30.00 off the retail price of the rate plan.

Ask If You Qualify! standupwireless.com 1-800-544-4441

Unresolved questions or complaints may be directed to your local Public Utilities Commission or customers in the states listed below may direct unresolved questions or complaints to the following organizations:

Colorado Public Utilities Commission: Consumer Affairs – 800-456-0858, 303-894-8070

Georgia Public Service Commission: Consumer Affairs – 800-282-5813, 404-656-4501

Pennsylvania Utility Commission Bureau of Consumer Services – 800-692-7380 or for FDD PA Relay Center 800-682-8706 (voice) or 800-682-8786 (TTY)

Kansas Commission's Office of Public Affairs and Consumer Protection – 800-662-0027 or 785-271-3140, TD 800-766-3777

Massachusetts Consumer Divisions Department of Telecommunications & Cable – 800-392-6066 or 617-305-3531

[†]After monthly allotted 5G/4G LTE data, next 20 GBs at 512 kbps, and remaining data at 128 kbps. Video typically streams in SD (480p). Lower speeds may affect audio and video streaming, access to certain websites and content, or the use of available applications. 5G access requires a 5G-capable device. 5G is not available in all areas. Data usage is subject to our Acceptable Use Policy (AUP). After 55 GBs of data usage in a month, data service will be placed on hold to confirm usage complies with AUP; customers using data consistent with AUP may receive unlimited additional data in 10 GBs increments for the rest of the month by contacting Customer Care. Available speeds will be determined by your particular service plan and may depend on other factors, including your device and network availability. For additional information about broadband speeds, including network limitations and our AUP, visit www.standupwireless.com/broadband. Promotional offers may be modified or withdrawn at any time. Taxes and fees included. Visit www.standupwireless.com for complete terms and conditions.

This is a Lifeline and Affordable Connectivity Program (ACP) supported service. Lifeline and the ACP are separate federal government assistance programs operated by the FCC. Lifeline benefits may be combined with ACP benefits and applied to the same service plan or different service plans. Lifeline and ACP services may be obtained from different service providers. Eligibility for Lifeline and ACP is based on income or participation in certain government benefit programs and is determined by the National Verifier (documentation may be required). Promotional FREE service offer is subject to eligibility, and you must be eligible to be enrolled in either program. Lifeline benefits are non-transferable and limited to one per household (wireless or wireline). An eligible ACP household is limited to one monthly service discount and a single one-time device discount. Connected device benefits require a co-pay of \$10.01. For more information on available devices, visit www.standupwireless.com/support/devices/. Monthly ACP service benefits may be transferred to another provider subject to applicable regulatory restrictions. For Lifeline and ACP eligibility criteria, applicable terms & conditions, and more information about the different programs, call us at 1-800-544-4441 or visit www.standupwireless.com. When the ACP ends or your household is no longer eligible, customers will be subject to our regular undiscounted rates. To enroll in Lifeline only, ACP only or a service plan that includes both Lifeline and ACP discounts, visit us at www.standupwireless.com. Lifeline plans include 1,000 Minutes, Unlimited Text and 4.5 GB of data. A complete listing of our plans, including plans that are fully covered (no co-pay after application of the ACP discount), is available at www.standupwireless.com/acp/plans. Offers may vary by state and service may not be available in all areas. Service provided by Global Connection Inc. of America d/b/a StandUp Wireless.

Llamadas, Textos y Datos Ilimitados[†]

Gratis cada mes cuando combina sus beneficios de Lifeline y ACP (ahorro de \$40)



Tabletas disponibles por tan solo \$ 10.01 para aquellos que califican.

¿Necesita Lifeline solamente o ACP solamente?

El plan gratis de Lifeline solamente incluye:
1,000 Minutos, Textos Ilimitados y 4.5 GB de Datos de alta velocidad

El plan gratis de ACP solamente incluye:
Llamadas, Textos y Datos[†] Ilimitados con 5GB de Datos de alta velocidad

El plan incluye: Llamadas y Textos Ilimitados y 10 GB de Datos de alta velocidad - 5G/4G LTE más Datos Ilimitados Adicionales[†]

Puede seleccionar cualquier plan de servicio disponible registrándose en www.standupwireless.com o puede actualizar su plan de servicio existente iniciando sesión en My Account en cualquier momento.

| Precio al por Menor | Precio para Usted* | Plan |
|---------------------|--|---|
| \$30 | GRATIS | Llamadas, Textos y Datos [†] Ilimitados con 5 GB de Datos de Alta Velocidad |
| \$40 | GRATIS <small>MEJOR VALOR</small> | Llamadas, Textos y Datos[†] Ilimitados con 10 GB de Datos de Alta Velocidad |
| \$50 | \$10 | Llamadas, Textos y Datos [†] Ilimitados con 12 GB de Datos de Alta Velocidad |
| \$60 | \$20 | Llamadas, Textos y Datos [†] Ilimitados con 16 GB de Datos de Alta Velocidad |
| \$75 | \$35 | Llamadas, Textos y Datos [†] Ilimitados con 25 GB de Datos de Alta Velocidad |
| \$110 | \$70 | Llamadas, Textos y Datos [†] Ilimitados con 60 GB de Datos de Alta Velocidad |

El Precio para Usted se aplica cuando solicita Lifeline y ACP. El cliente que se registre solo en ACP recibirá \$30 de descuento en el precio minorista del plan.

Pregunte si Califica! standupwireless.com 1-800-544-4441

Las preguntas o quejas no resueltas pueden dirigirse a la Comisión de Servicios Públicos o los clientes en los estados que se enumeran a continuación pueden dirigir preguntas o quejas no resueltas a las siguientes organizaciones:

Comisión de Servicios Públicos de Colorado: Asuntos del Consumidor - 800-456-0858, 303-894-8070

Comisión de Servicios Públicos de Georgia: Asuntos del Consumidor - 800-282-5813, 404-656-4501

Oficina de Servicios al Consumidor de la Comisión de Servicios Públicos de Pensilvania: 800-692-7380 o para el Centro de retransmisión PA de FDD 800-682-8706 (voz) o 800-682-8786 (TTY)

Oficina de Asuntos Públicos y Protección al Consumidor de la Comisión de Kansas: 800-662-0027 o 785-271-3140, TD 800-766-3777

Departamento de Telecomunicaciones y Cable de las Divisiones de Consumidores de Massachusetts - 800-392-6066 o 617-305-3531

[†] Después de los datos 5G/4G LTE asignados mensualmente, los siguientes 20 GB a 512 kbps y los datos restantes a 128 kbps. El video generalmente se transmite en SD (480p). Las velocidades más bajas pueden afectar la transmisión de audio y video, el acceso a ciertos sitios web y contenido, o el uso de aplicaciones disponibles. El acceso 5G requiere un dispositivo compatible con 5G. 5G no está disponible en todas las áreas. El uso de datos está sujeto a nuestra Política de uso aceptable (AUP). Después del uso de 55 GB de datos en un mes, el servicio de datos se suspenderá para confirmar que el uso cumple con AUP, los clientes que usan datos consistentes con AUP pueden recibir datos adicionales ilimitados en incrementos de 10 GB durante el resto del mes comunicándose con Atención al cliente. Las velocidades disponibles estarán determinadas por su plan de servicio particular y pueden depender de otros factores, incluidos su dispositivo y la disponibilidad de la red. Para obtener información adicional sobre las velocidades de banda ancha, incluidas las limitaciones de la red y nuestra AUP, visite www.standupwireless.com/broadbandTD. Las ofertas promocionales pueden modificarse o retirarse en cualquier momento. Impuestos y tasas incluidos. Visite www.standupwireless.com para conocer los términos y condiciones completos.

Este es un servicio respaldado por Lifeline y el Programa de Descuentos para Internet (ACP). Lifeline y ACP son programas independientes de asistencia del gobierno federal operados por la FCC. Los beneficios de Lifeline pueden combinarse con los beneficios de ACP y aplicarse al mismo plan de servicio o a diferentes planes de servicio. Los servicios de Lifeline y ACP se pueden obtener de diferentes proveedores de servicios. La elegibilidad para Lifeline y ACP se basa en los ingresos o la participación en ciertos programas de beneficios del gobierno y la determina el Verificador Nacional (es posible que se requiera documentación). La oferta de servicio promocional GRATIS está sujeta a elegibilidad, y usted debe ser elegible para inscribirse en cualquiera de los programas. Los beneficios de Lifeline no son transferibles y están limitados a uno por hogar (inalámbrico o fijo). Un hogar ACP elegible está limitado a un descuento de servicio mensual y un descuento de dispositivo único. Los beneficios de dispositivos conectados requieren un copago de \$10.01. Para obtener más información sobre los dispositivos disponibles, visite www.standupwireless.com/support/devices/. Los beneficios del servicio ACP mensual pueden transferirse a otro proveedor sujeto a las restricciones regulatorias aplicables. Para los criterios de elegibilidad de Lifeline y ACP, los términos y condiciones aplicables y más información sobre los diferentes programas, llámenos al 1-800-544-4441 o visite www.standupwireless.com. Cuando termine el ACP o su hogar ya no sea elegible, los clientes estarán sujetos a nuestras tarifas regulares sin descuento. Para inscribirse solo en Lifeline, solo en ACP o en un plan de servicio que incluye descuentos tanto en Lifeline como en ACP, visítenos en www.standupwireless.com. Los planes Lifeline incluyen 1000 minutos, mensajes de texto ilimitados y 4.5 GB de datos. Una lista completa de nuestros planes, incluidos los planes que están completamente cubiertos (sin copago después de la aplicación del descuento ACP), está disponible en www.standupwireless.com/acp/plans. Las ofertas pueden variar según el estado y es posible que el servicio no esté disponible en todas las áreas. Servicio proporcionado por Global Connection Inc. of America d/b/a StandUp Wireless.

EXHIBIT 5

Coverage Area

| Zip | State |
|-------|-------|
| 00072 | WA |
| 00073 | WA |
| 00074 | WA |
| 98001 | WA |
| 98002 | WA |
| 98003 | WA |
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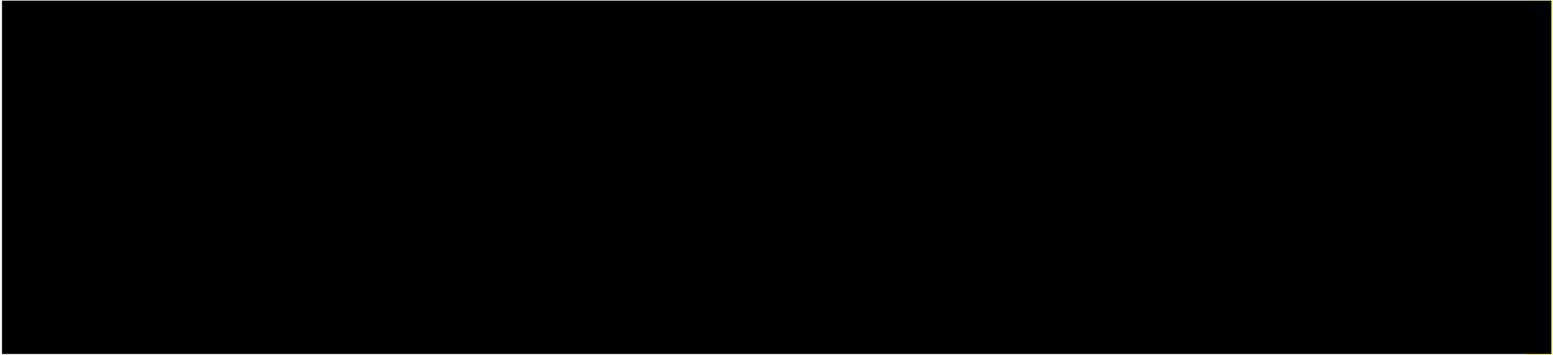
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EXHIBIT 6

Financial Statements & Subscriber Information

CONFIDENTIAL PER WAC 480-07-160

Global Connection Inc. of America
Profit & Loss
January 2020 through December 2020



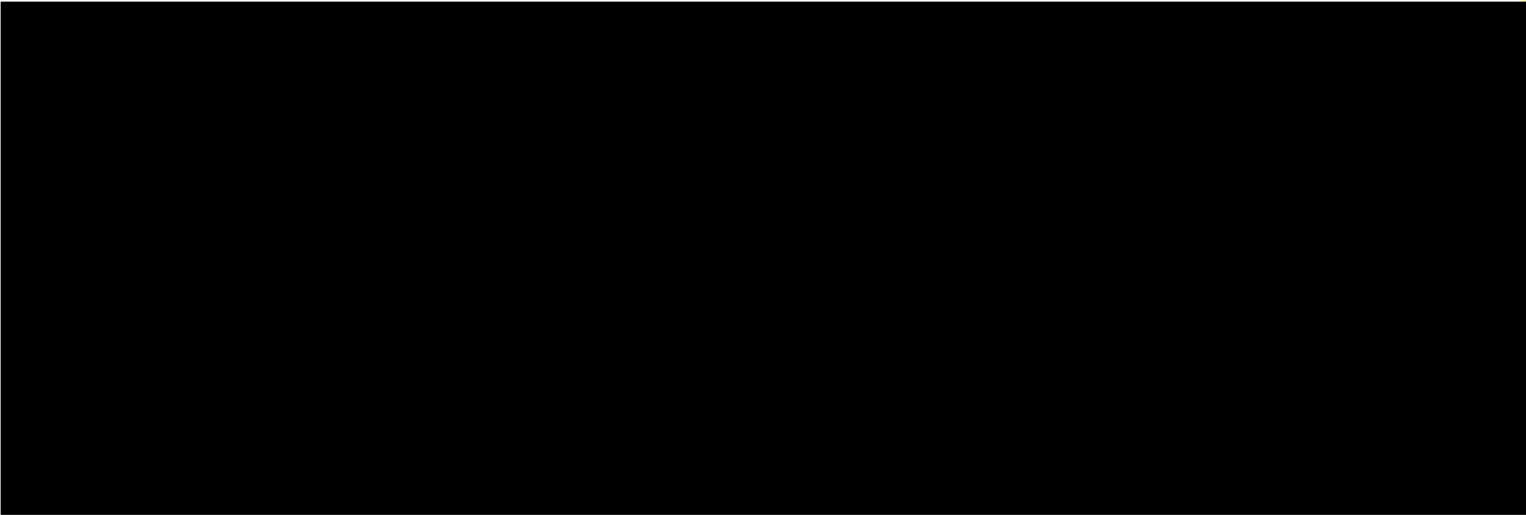
Global Connection Inc. of America

Balance Sheet

As of December 31, 2020

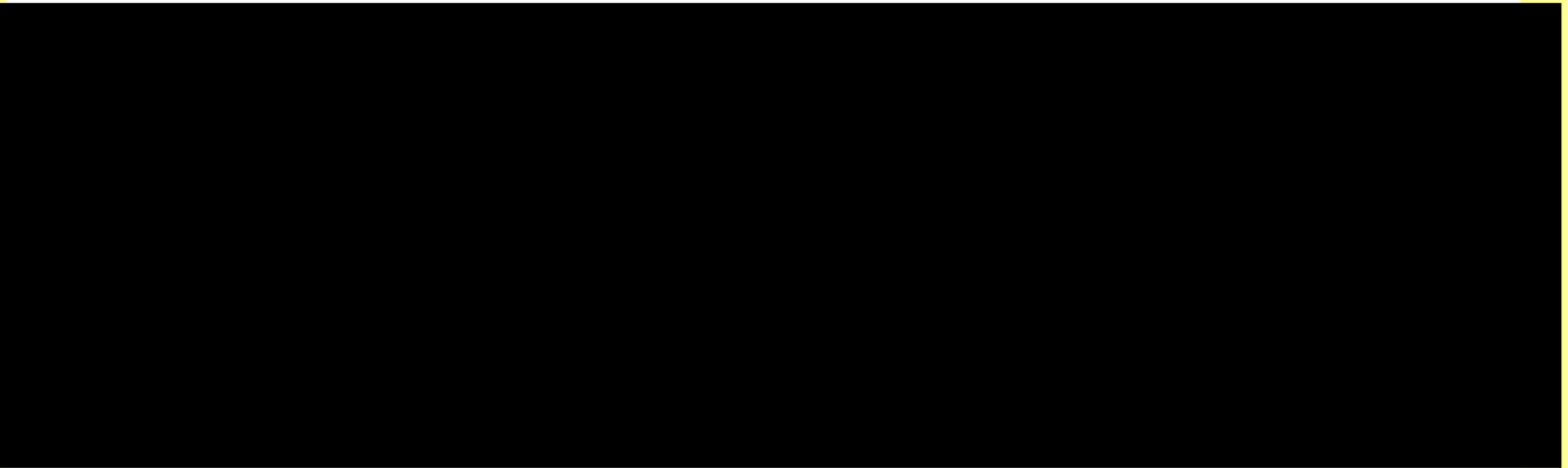


Global Connection Inc. of America
Balance Sheet
As of December 31, 2021

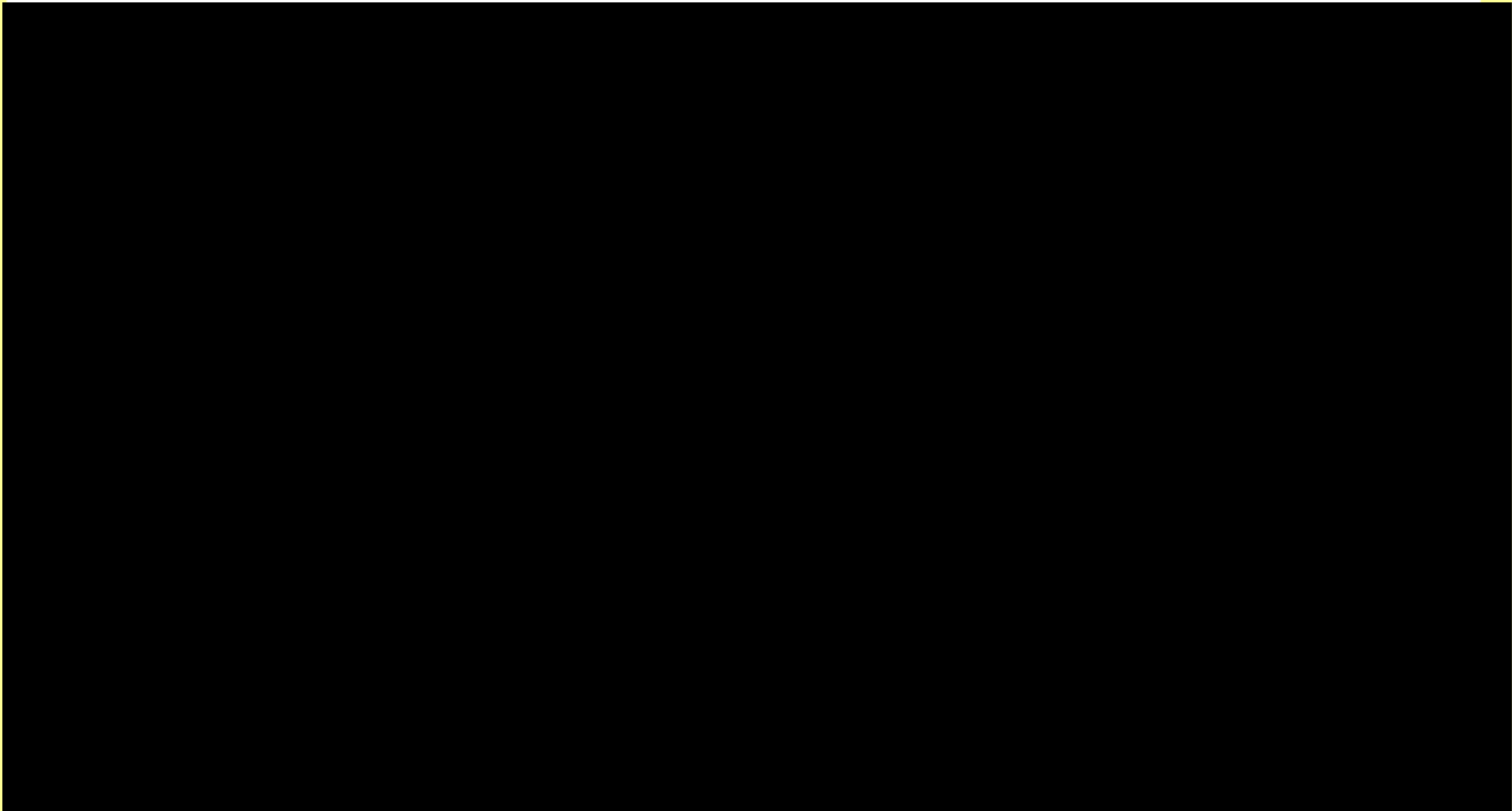


Global Connection Inc. of America
Profit & Loss
January 2021 through December 2021

CONFIDENTIAL PER WAC 480-07-160

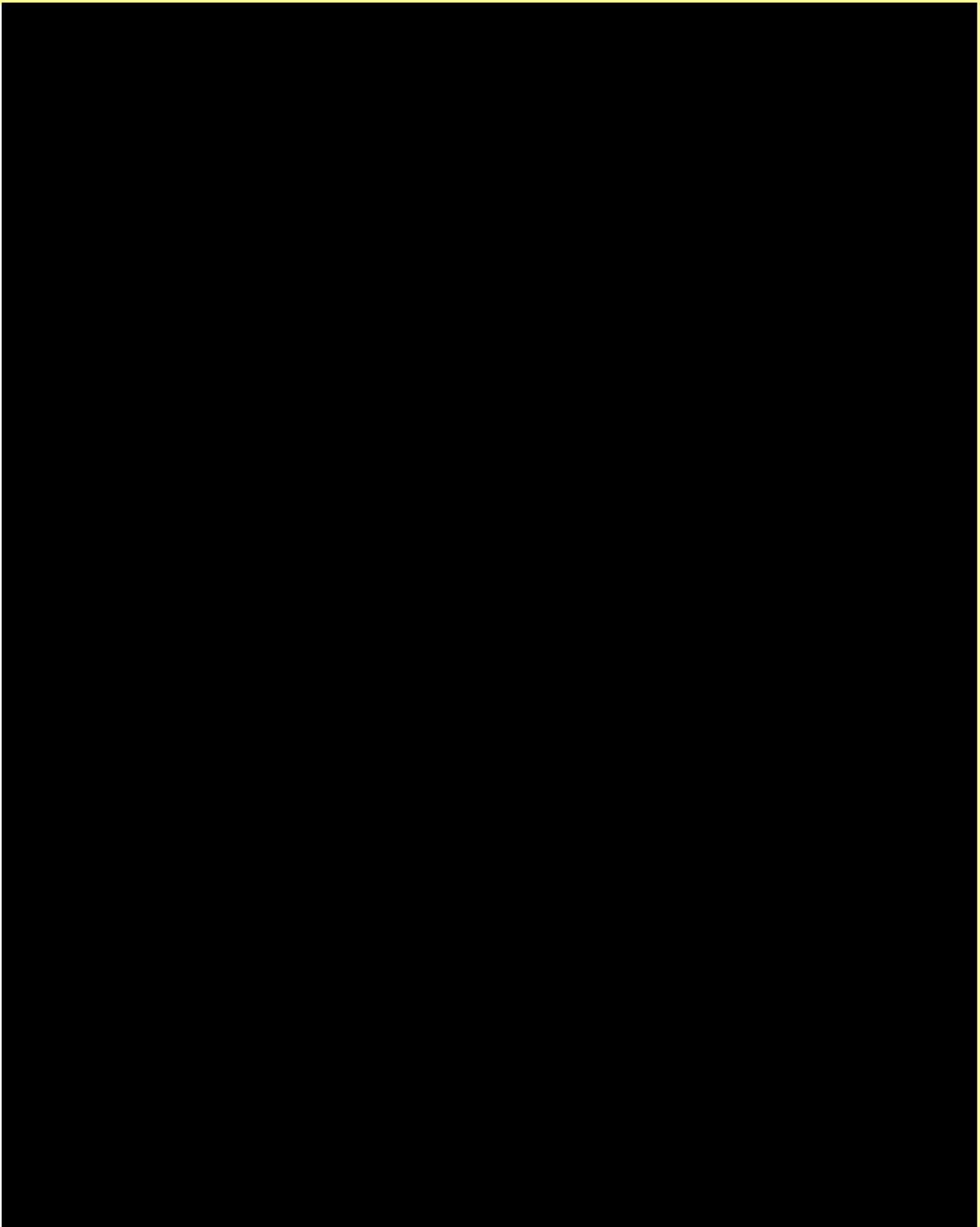


Global Connection Inc. of America



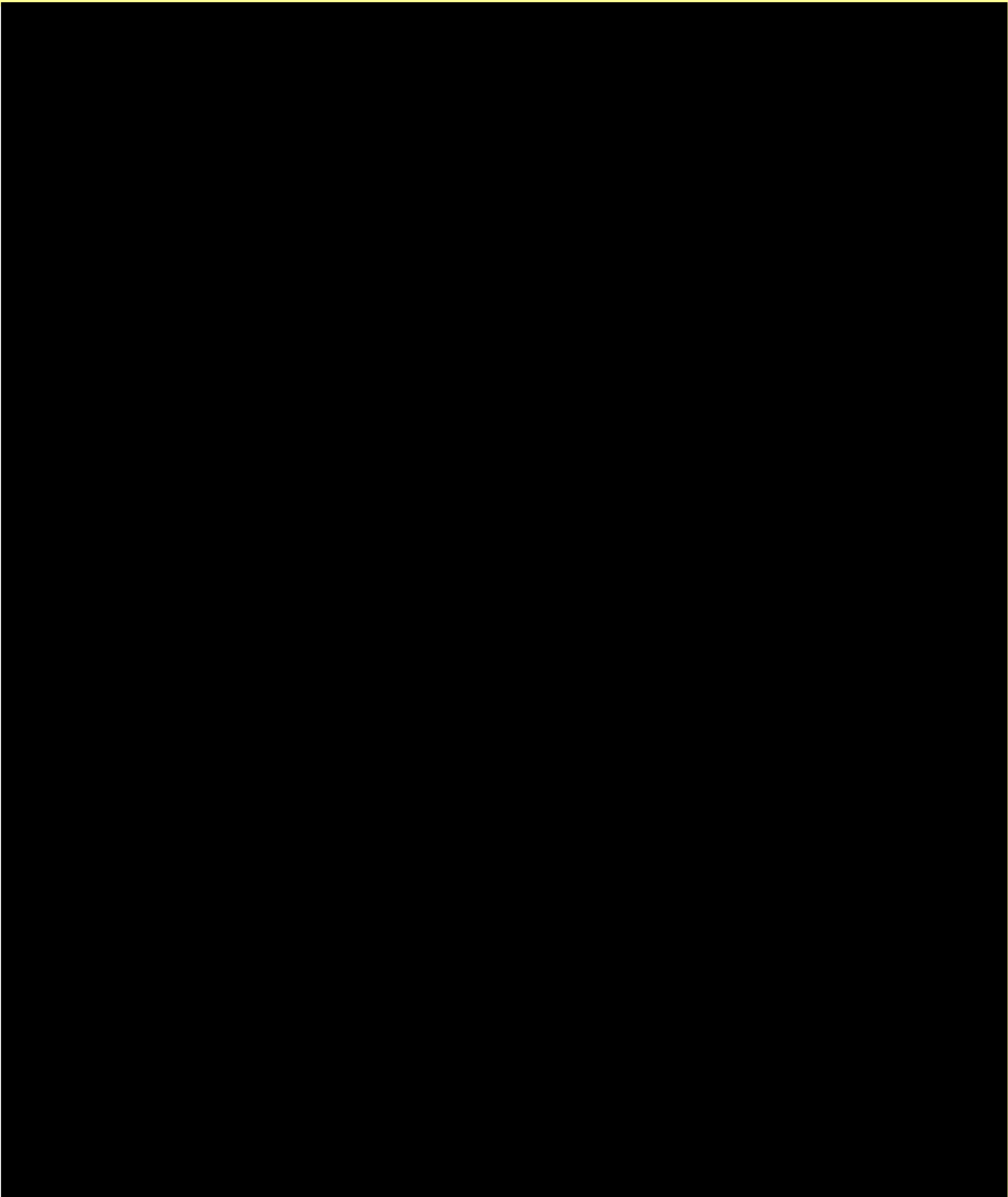
Lifeline Customers per State

CONFIDENTIAL PER WAC 480-07-160



Prepaid Customers Per State

CONFIDENTIAL PER WAC 480-07-160



CONFIDENTIAL PER WAC 480-07-160

Non Lifeline Customers Per State

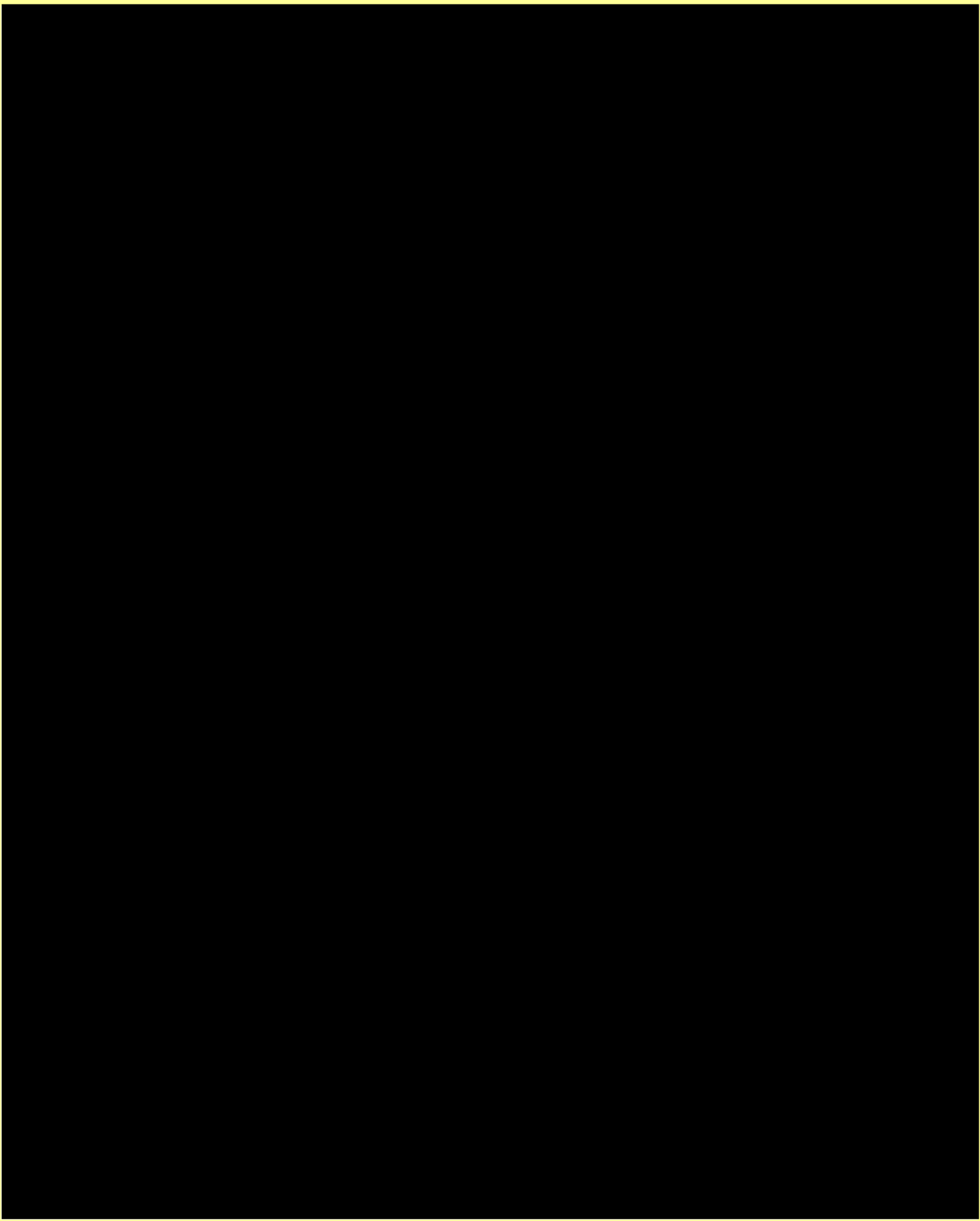
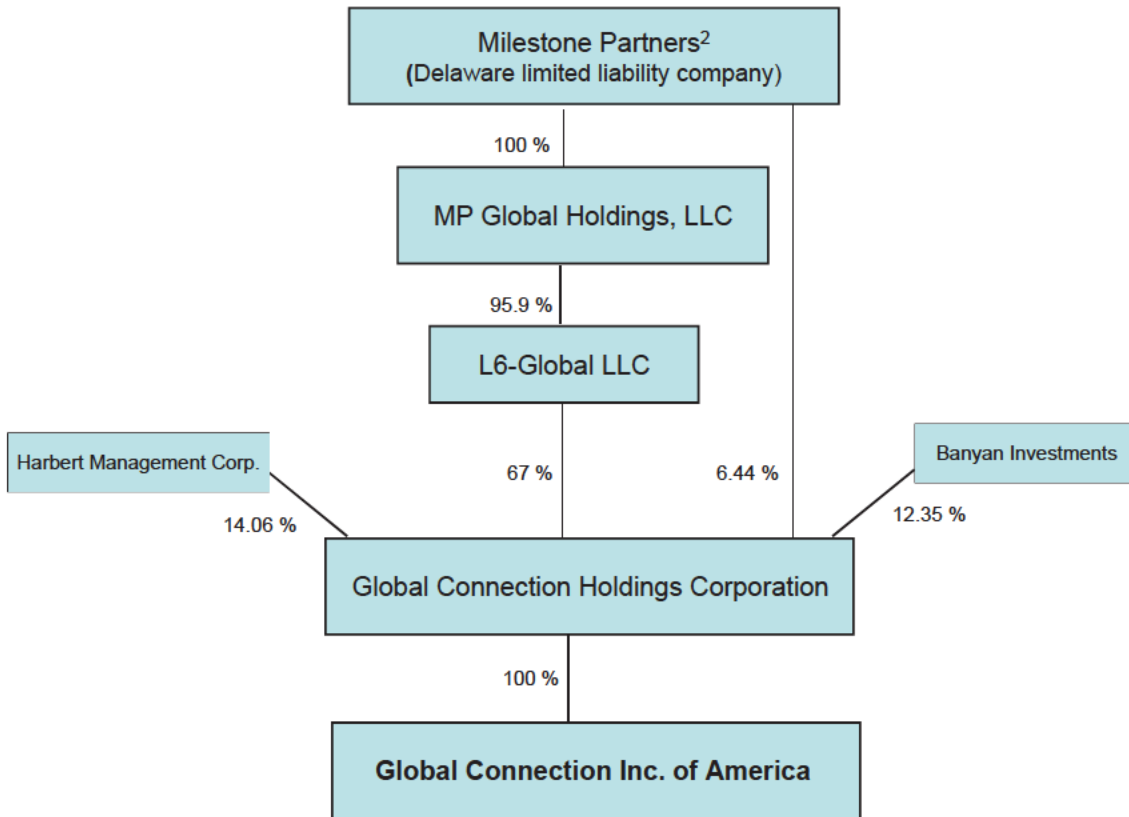


EXHIBIT 7

Corporate Structure Diagrams

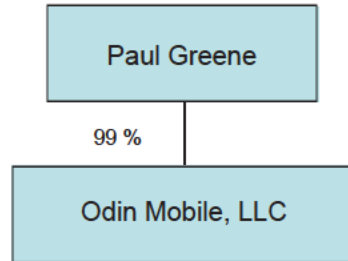
**Global Connection Inc. of America
Pre-Close Corporate Structure
(Interests \geq 10%)¹**



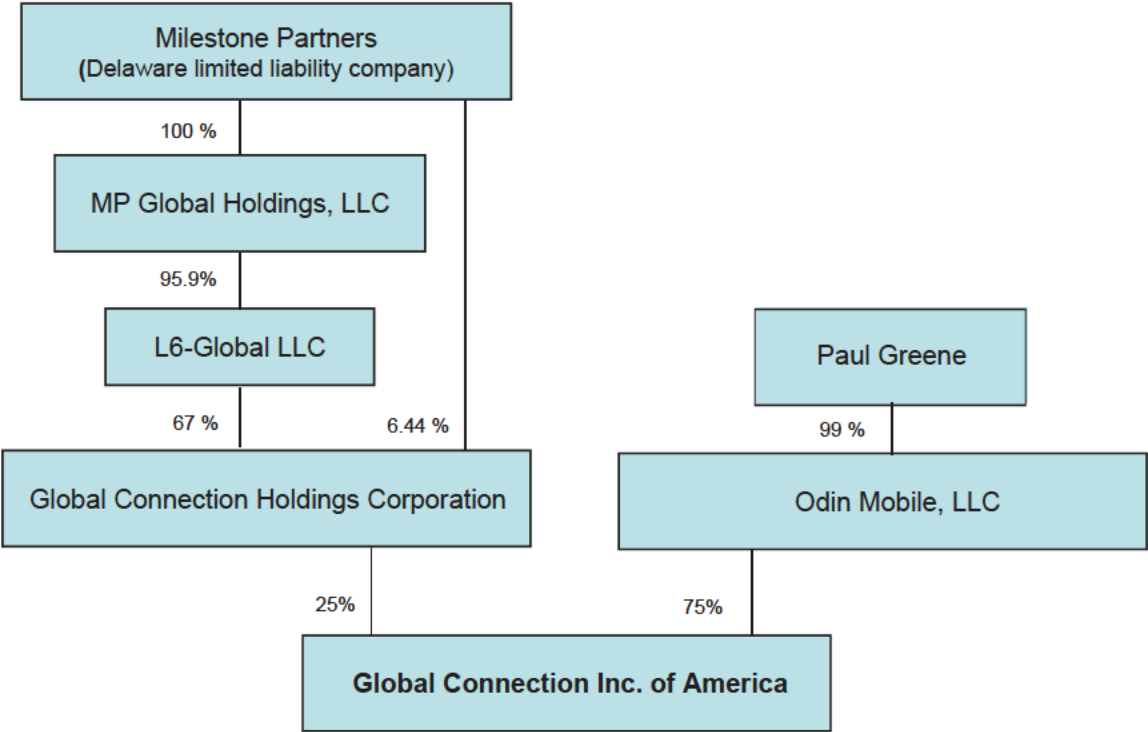
¹ Percentages shown above the level of Global Connection Holdings Corporation reflect actual interests (not adjusted for application of attribution rule) in immediate subsidiary and not indirect ownership interest in GCIOA.

² Milestone Partners holds a total indirect interest in GCIOA of 70.64% by direct calculation and 100% applying the attribution rule. These interests are held through several funds. Direct interests in MP Global Holdings, LLC are held by Milestone Partners III, L.P. (72.5%) and Milestone Partners III, L.P 2 (27.5%). The general partner of both funds is Milestone Partners III G.P., L.P. The general partner of Milestone Partners III G.P., L.P is Milestone Partners III, LLC. Voting or investment control over securities that the Milestone Partners Funds own are acted upon by vote of Milestone Partners III, LLC whose current members (all U.S. citizens) are W. Scott Warren, John P. Shoemaker, Brooke B. Hayes, and Robert G. Levine.

**Odin Mobile, LLC
Pre-Close Corporate Structure
(Interests \geq 10%)¹**



**Global Connection Inc. of America
Post-Close Corporate Structure
(Interests \geq 10%)¹**



¹ Percentages shown above the level of GCIOA reflect actual interests (not adjusted for application of attribution rule) in immediate subsidiary and not indirect ownership interest in GCIOA.