2014-43-C 278214
2012-167C 278213

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September 5, 2018

VIA FEDERAL EXPRESS

Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

Re: Global Connection Inc. of America d/b/a Stand Up Wireless
Docket No. 2012-167-C; Notice of Revised FCC Compliance Plan

Dear Sir/Madam:

Pursuant to Order No. 2012-776 in the above-referenced docket, Global Connection Inc. of America d/b/a Stand Up Wireless ("Company") hereby notifies the Commission of changes to the Company's Compliance Plan approved by the Federal Communications Commission ("FCC").

The FCC recently approved the Company's transfer of majority control to Odin Mobile, LLC (the "Transaction").[1] As the final step in approving the Transaction, the FCC released a Public Notice[2] approving Global Connection's revised Amended Compliance Plan, which was filed in light of the Transaction on April 16, 2018, a copy of which is attached hereto.[3]

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

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[1] The international Section 214 transfer of control application was approved on April 7, 2017. The domestic Section 214 transfer of control application was approved on June 15, 2018.

[2] See https://docs.fcc.gov/public/attachments/DA-18-854A1.pdf.

[3] A copy of the FCC-approved revised Amended Compliance Plan can also be viewed at the following link: https://ecfsapi.fcc.gov/file/10416110300883/Global%20Connection%20FCC%20Amended%20Wireless%20(%2B%20Wireline)%20CP%20(April%202018).pdf

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

Respectfully submitted,

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Attorneys for Global Connection Inc. of America d/b/a Stand Up Wireless

Enclosure
cc: ORS via USPS (2 copies)

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COPY OF GLOBAL CONNECTION INC. OF AMERICA'S
FCC-APPROVED AMENDED COMPLIANCE PLAN

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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 wireline[1] and wireless[2] 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).

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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.

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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

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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

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Global Connection provides wireless service in twenty-six (26) territories[6] 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.

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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.

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[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.

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ACCESS TO 911 AND E911 SERVICES[11]

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.

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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 LIFELINE[16]

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.

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[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.

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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 identification[18] 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 activities[20] 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 though 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.

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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/.

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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

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[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 '[l]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.

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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

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[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).

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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 sufficient[37]); (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).

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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]

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[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.

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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.

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[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).

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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 enrollment[50] 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 household[52]

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[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

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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

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"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.)

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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 USAC[60] 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]

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[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).

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II. Description of Lifeline Service Offerings[64]

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC[65] 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 Name[1]	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:

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[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 Package[66] for $20.70,[67] an Advantage Package[68] for $25.70 and a Premium Package[69] 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 Package[70] for $32.95 and an Advantage Package[71] 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.

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Carolina, and offers a Lifeline-discounted Basic Package[72] for $36.70 and an Advantage Package[73] 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 Package[74] for $36.70 and an Advantage Package[75] 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 Designation[76]

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.

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[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)).

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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.

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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.

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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.

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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 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).

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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.

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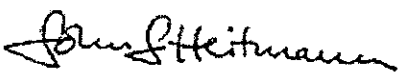
the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



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Attorneys for Global Connection Inc. of America

April 16, 2018

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Exhibit A

Model Application/Certification Form

A-1 Wireless
A-2 Wireline

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A-1 Wireless

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standup 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.

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____ 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:	

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A-2 Wireline

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Global Connection Inc. of America
Tel: 1-877-511-3999 • Fax: 1-888-878-9923
P.O. Box 1187 Norcross, GA 30091

Your HOME PHONE SERVICE

WIRELINE LIFELINE SERVICE APPLICATION AND CERTIFICATION

-GLOBAL-

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):**

- ☐ 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)

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

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B-1 Wireless

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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-tranferable. 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 Protection 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

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Global Connection Inc. of America
Tel: 877-[illegible] Fax: 866-[illegible]
PO Box 115 [illegible] GA [illegible]

GLOBAL HOME PHONE SERVICE

LIFELINE SERVICE APPLICATION
INCOME ELIGIBILITY WORKSHEET

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-tranferable. 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

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C-1 Wireless

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stand up 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

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HOME PHONE SERVICE

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: _____

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Exhibit D

Marketing Materials

D-1 Wireless
D-2 Wireline

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D-1 Wireless

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stand up 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-tranferable. 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.

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

Visit www.StandUPWireless.com for complete terms & conditions

Whole market 2x3 ad GEN REV005-041018

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D-2 Wireline

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Real
HOME PHONE SERVICE™

www.RealHomePhone.com

Service provided by Global Connection Inc. of America

SAY HELLO TO REAL HOME PHONE

BIG $AVING$

CALL US TODAY: 1-877-511-3009

This is a Lifeline service. Lifeline is a government assistance program. Your Lifeline Benefit is non-tranferable. 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).

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

Whole market 2x3 RHP ad GEN REV005-041018

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Exhibit E

Georgia Public Service Commission Order

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COMMISSIONERS:

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

FILED
DEC 28 2010
EXECUTIVE SECRETARY
G.P.S.C.

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

REECE McALISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

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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.

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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.

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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

12-22-10
Date

Lauren "Bubba" McDonald, Jr.
Chairman

12-22-10
Date

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BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

FILED
DEC 13 2010
EXECUTIVE SECRETARY
G.P.S.C.

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

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.

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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.

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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.

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