

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**IN RE:**

**APPLICATION OF TELRITE CORPORATION D/B/A  
LIFE WIRELESS FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER IN  
THE STATE OF SOUTH CAROLINA**

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**DOCKET NO: 2012-325-C**

**PREFILED DIRECT TESTIMONY OF BRIAN LISLE  
SUBMITTED BY  
TELRITE CORPORATION d/b/a LIFE WIRELESS**

1 **Q. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT AND BUSINESS ADDRESS.**

2  
3 A. My name is Brian Lisle I am employed by Telrite Corporation, d/b/a Life Wireless (“Life  
4 Wireless” or the “Company”)as its President. My business address is 1480 Terrell Mill Road, SE,  
5 Suite 104, Marietta, Georgia 30067

6 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

7 A. The purpose of my testimony is to discuss the qualifications of Life Wireless to be  
8 designated as an Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving  
9 federal universal service “Lifeline” support from the low income fund, and to support the  
10 Stipulation which Life Wireless has entered into with the ORS in regard to this Petition.

11 **Q. PLEASE DESCRIBE LIFE WIRELESS.**

12 A. Life Wireless is a trade name of Telrite Corporation (“Telrite”). Life Wireless will offer  
13 resold wireless services which Life Wireless will obtain from its underlying wireless provider  
14 AT&T. AT&T’s extended footprint allows Life Wireless to provide expanded coverage  
15 throughout otherwise underserved markets. Life Wireless has developed and implemented a  
16 network that delivers all of the services required by the federal Lifeline guidelines, and employs  
17 the AT&T carrier network to ensure ubiquitous coverage. Life Wireless operates a major  
18 customer service and network data facility located in Georgia. Telrite/Life Wireless and its  
19 affiliates employ 109 employees in three locations across the Atlanta, GA area.

20 **Q. IN WHICH OTHER JURISDICTIONS DOES TELRITE OFFER SERVICES?**

21 A. Telrite is an Inter-Exchange Carrier in 48 jurisdictions and a Facilities Based Competitive  
22 Local Exchange Carrier in 18 jurisdictions. Life Wireless is a wireless ETC in the states of Illinois,  
23 Indiana, Missouri, Arkansas, Louisiana, West Virginia, Georgia, Maryland, Minnesota, Rhode  
24 Island, Oklahoma and Puerto Rico and has pending applications in Arizona, Kansas, Maine,  
25 Washington, Wisconsin, Pennsylvania, Mississippi, New Jersey, Michigan, Utah, and California.

1 **Q. DOES THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION HAVE JURISDICTION TO**  
2 **DESIGNATE LIFE WIRELESS AS AN ETC?**

3 A. Yes, Section 214(e)(2) of the Communications Act authorizes state commissions such as  
4 the Public Service Commission of South Carolina to designate ETC status for federal universal  
5 service purposes.<sup>1</sup> The FCC has further ruled that Section 214(e)(2) “provides state commissions  
6 with the primary responsibility for designating ETCs.”<sup>2</sup> The FCC has promulgated rules governing  
7 ETC designations, set forth at 47 C.F.R. §54.101, §54.201-203, and §54.205-207 (the “FCC Rules”)  
8 to establish various requirements for carriers to obtain ETC status. Applicants seeking ETC  
9 status in South Carolina must address and satisfy each of the ETC designation criteria under the  
10 FCC Rules and S.C. Code Reg. 103-690.

11 **Q. PLEASE IDENTIFY THE AREA IN WHICH LIFE WIRELESS SEEKS DESIGNATION AS AN ETC?**

12 A. The exchanges in which Life Wireless is seeking ETC designation are listed in Exhibit A to  
13 Life Wireless’ Petition and are located in every region of the state.

14 **Q. PLEASE DESCRIBE LIFE WIRELESS’ SERVICE OFFERING?**

15 A. Life Wireless will offer qualified consumers their choice of 125 or 250 anytime prepaid  
16 minutes per month at no charge. Minutes do not expire for the 125 minute plan and unused  
17 minutes are rolled over to the next month. Unused minutes for the 250 minute plan do not roll  
18 over. Text messaging is available at the rate of:

19 (a) 125 Minute Plan: 1/3 minute (*i.e.* 3 SMS texts per voice minute)

20 (b) 250 Minute Plan: 1/3 minute (*i.e.* 3 SMS texts per voice minute)

21 All low-income universal service support will be used to allow Life Wireless to provide the  
22 service with no monthly recurring charge, thus ensuring that consumers receive the full benefit  
23 of the universal service support funding for which Life Wireless will seek reimbursement.

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<sup>1</sup> 47 U.S.C.A. § 214(e)(2). *See Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8858-59 (¶ 145) (1997). (*Universal Service First Report & Order*”).

<sup>2</sup> *See Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371, 6372 (¶ 1, n. 2) (2005) (“*ETC Criteria Order*”); *see also* S.C. Code Reg. § 103-690 and 103-690.1.

1 Furthermore, Life Wireless will provide Lifeline customers a company funded \$3.50 credit, as  
2 long as this requirement remains in effect for South Carolina Lifeline ETCs. Therefore, together,  
3 the state and federal credits offered in South Carolina will be at least \$12.75.

4 In the event that all airtime has been used, Lifeline customers can purchase additional  
5 bundles of minutes in denominations of \$10.00, \$25.00, \$4.95, \$7.95, \$12.95, \$21.49 and  
6 \$29.95.<sup>3 4</sup> Airtime, when used for standard cellular calls, is valued at and will be decremented at  
7 the following rates:

8 (c) \$10.00 denomination - \$0.099 per minute of use;

9 (d) \$25.00 denomination - \$0.0708 per minute of use;

10 (e) \$4.95 denomination - 1 day Unlimited Talk and SMS;

11 (f) \$7.95 denomination - 3 day Unlimited Talk and SMS;

12 (g) \$12.95 denomination - 1 week Unlimited Talk and SMS;

13 (h) \$21.95 denomination – 2 weeks Unlimited Talk and SMS;

14 (i) \$29.95 denomination – 1 month Unlimited Talk and SMS.

15 Airtime “top-up” minutes are available for purchase at the Company’s retail locations,  
16 through any MoneyGram location<sup>5</sup> and on the Company’s website.<sup>6</sup> Additional information  
17 regarding the Company’s plans, rates and services can be found on its website:  
18 [www.lifewireless.com](http://www.lifewireless.com). In addition to free voice services, Life Wireless’ Lifeline plan will  
19 customize calling features at no charge, including Caller ID, Call Waiting, Call Forwarding, 3-Way  
20 Calling, Voice Mail, No Roaming charges and free access to Customer Care by dialing 611 from

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<sup>3</sup> The \$29.95 rate for unlimited talk and text is available only to Life Wireless customers that purchase online or by calling Telrite customer service. The retail rate available in stores is \$37.95.

<sup>4</sup> If reasonably and fairly required by the Commission to adjust its service plans to achieve comparability in order to meet standards in the public interest, Telrite commits to making any such adjustment.

<sup>5</sup> MoneyGram locations may be found at <https://www.moneygram.com/wps/portal/moneygramonline/home/sendmoney?CC=US&LC=en-US>.

1 customers' Life Wireless handset or by dialing 1-888-543-3620 from any wireline phone. All  
2 plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency  
3 services are always free, regardless of service activation or availability of minutes. The terms and  
4 conditions of its voice telephony service plans offered to Lifeline subscribers are detailed in the  
5 Amended Compliance Plan filed with the FCC on November 29, 2012, attached to my testimony  
6 as Exhibit BL-1 and on the Terms of Service attached as **Exhibit "F"** to Life Wireless' Petition.

7 Under Life Wireless' proposed low-income wireless offering, each eligible wireless  
8 customer will also receive a 911 compliant handset at no cost to the subscriber. Attached to the  
9 Petition as **Exhibit "G"** is information regarding the handsets issued by Life Wireless to its  
10 customers. Wireless handsets will be delivered at no charge to qualifying customers, service  
11 will be activated, and the requisite number of minutes will be added upon certification of the  
12 customer for Lifeline.

13 **Q. WILL A LIFELINE CUSTOMER EVER INCUR ROAMING CHARGES?**

14 A. Life Wireless does not charge consumers for roaming.

15 **Q. HAS LIFE WIRELESS' COMPLIANCE PLAN BEEN APPROVED BY THE FEDERAL COMMUNICATIONS**  
16 **COMMISSION ("FCC")?**

17 A. Life Wireless' compliance plan is currently pending at the FCC. Life Wireless is asking the  
18 Commission to designate it as a Lifeline ETC contingent on and effective upon the FCC's approval  
19 of its compliance plan.  
20

21 **Q. WHAT ARE THE REQUIREMENTS FOR DESIGNATION AS A LIFELINE ONLY ETC?**

22 A. To be designated an ETC for purposes of receiving "Lifeline support" from the federal  
23 Universal Service Fund, an applicant must:  
24

25 (1) be a common carrier, as defined by 47 U.S.C. § 153(10);

26 (2) offer throughout its proposed service areas the supported services set forth in 47  
27 C.F.R. § 54.101(a) either by using its own facilities or a combination of its own  
28 facilities and the resale of another carrier's services;

- 1 (3) advertise the supported services throughout the designated service area; and,  
2 (4) demonstrate that it is financially and technically capable of providing the Lifeline  
3 service in compliance with 47 C.F.R. § 54.202(a)(4).

4 **Q. IS LIFE WIRELESS A COMMON CARRIER AS DEFINED BY 47 U.S.C. §153(10)?**

5  
6 A. Yes. Life Wireless is regulated as a common carrier in connection with its provision of  
7 Commercial Mobile Radio Service (“CMRS”). Therefore, Life Wireless certifies that it is a  
8 common carrier under 47 U.S.C. § 214(e)(1) for purposes of ETC designation.

9 **Q. DOES LIFE WIRELESS OFFER THE SUPPORTED SERVICES SET FORTH IN 47 C.F.R. § 54.101(a)**  
10 **EITHER BY USING ITS OWN FACILITIES OR A COMBINATION OF ITS OWN FACILITIES AND THE**  
11 **RESALE OF ANOTHER CARRIER’S SERVICES?**

12  
13 A. Life Wireless will offer all required services and functionalities. Section 214(e)(1)(A) of  
14 the Act<sup>7</sup> requires an ETC to offer the services that are supported by federal universal service  
15 support mechanisms under section 254(c). Effective December 29, 2011, pursuant to the  
16 USF/ICC Transformation Order<sup>8</sup> as further clarified by the USF/ICC Order on Reconsideration<sup>9</sup>,  
17 the FCC eliminated its former list of nine supported services and amended section 54.101(a) of  
18 its rules to specify that “voice telephony service” is supported by the federal universal service  
19 mechanisms. The amended Section 54.101(a) and its list of supported services reads as follows:  
20 The functionalities of eligible voice telephony services include voice grade access to the public  
21 switched network or its functional equivalent; minutes of use for local service provided at no

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<sup>7</sup> 47 U.S.C. § 214(e)(1).

<sup>8</sup> In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“USF/ICC Transformation Order”).

<sup>9</sup> In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (“USF/ICC Order on Reconsideration”).

1 additional charge to end users; access to the emergency services provided by local government  
2 or other public safety organizations, such as 911 and enhanced 911, to the extent the local  
3 government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;  
4 and toll limitation for qualifying low-income consumers (as described in subpart E of this part).

5 Upon designation as an ETC in South Carolina, and consistent with state and federal  
6 policies favoring universal service, Life Wireless will offer voice telephony services as described  
7 in the amended Section 54.101 of the FCC Rules.<sup>10</sup> To the extent that the Commission continues  
8 to require ETCs to provide those services supported by federal universal service support  
9 mechanisms previously enumerated in 47 C.F.R. § 54.101(a), Life Wireless commits to continue  
10 to satisfy state voice service requirements.<sup>11</sup>

11 The Company also will provide access to emergency services provided by local  
12 government or public safety officials, including 911 and enhanced 911 ("E911") where available  
13 and will comply with any Commission requirements regarding E911-compatible handsets. As  
14 discussed above, the Company will comply with the Commission's forbearance grant conditions  
15 relating to the provision of 911 and E911 services and handsets. Life Wireless also commits to  
16 remit 911 revenues to local authorities. The Company commits to pay in a timely manner all  
17 applicable federal, state and local regulatory fees, including but not limited to universal service  
18 and E911 fees.<sup>12</sup>

19 Life Wireless will not provide toll limitation service ("TLS"), which allows low-income  
20 consumers to avoid unexpected toll charges. However, since the Company is a prepaid service  
21 provider, customers cannot be disconnected for failure to pay toll charges, nor are there  
22 additional charges for exceeding their minutes. Further, the Company, like most wireless

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<sup>10</sup> 47 C.F.R. §§ 54.101(a).

<sup>11</sup> USF/ICC Transformation Order at ¶ 82.

<sup>12</sup> See TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition, FCC Docket No. 96-45 (May 3, 2010).

1 carriers, does not differentiate domestic long distance toll usage from local usage and all usage  
2 is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such services are  
3 not considered to have voluntarily elected to receive TLS.<sup>13</sup>

4 **Q. ARE THERE ADDITIONAL ELIGIBILITY CRITERIA THAT AN APPLICANT MUST SATISFY TO BE**  
5 **DESIGNATED AN ETC?**

6  
7 A. Yes. There are additional eligibility criteria established by both the Commission and the  
8 FCC.

9 **Q. DOES LIFE WIRELESS MEET THE ADDITIONAL ELIGIBILITY CRITERIA ESTABLISHED IN THE**  
10 **COMMISSION AND FCC'S REGULATIONS?**

11  
12 A. Yes. Life Wireless will comply with all additional ETC requirements set forth in Section  
13 103-690 of the S.C. Code Reg. and Section 54.201 of the FCC's rules, as recently modified by the  
14 FCC in its *Lifeline Reform Order*.

15 **Q. PLEASE DESCRIBE HOW LIFE WIRELESS WILL SATISFY EACH OF THE ADDITIONAL ELIGIBILITY**  
16 **CRITERIA.**

17  
18 A. The requirements for designation of ETCs were recently amended by the FCC. Effective  
19 April 2, 2012, 47 C.F.R. § 54.202 imposes a number of changed requirements in order to be  
20 designated an ETC under Section 214(e)(6). Life Wireless will comply with the requirements of  
21 47 C.F.R. § 54.202, effective April 2, 2012, and will comply with the South Carolina requirements  
22 for initial designation pursuant to S.C. Code Reg. 103-690 as illustrated below.

23 **1. Commitment to Provide Service. S.C. Code Reg. 103-690(C)(a)(1)(A)**

24  
25 A. Life Wireless hereby makes a commitment to provide service throughout its proposed  
26 ETC designated service area to all customers who make a reasonable request for service. If Life  
27 Wirelesses' network already passes or covers the potential customer's premises, Life Wireless  
28 will provide service immediately. For those instances where a request comes from a potential  
29 customer within Life Wireless' proposed ETC Designated Area but outside its existing network

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<sup>13</sup> Lifeline Reform Order at ¶ 230.

1 coverage, Life Wireless will provide service within a reasonable period of time if service can be  
2 provided at a reasonable cost utilizing one or more of the following methods: (1) modifying or  
3 replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other  
4 equipment; (3) adjusting network or customer facilities; or (4) reselling services from another  
5 carrier's facilities to provide service.

6 Life Wireless not only commits to provide service throughout its Service Area, but also  
7 commits to provide universal service in a timely manner to all customers who make a  
8 reasonable request for service pursuant to the FCC Rules.<sup>14</sup> If designated as a wireless ETC, Life  
9 Wireless will provide service throughout its Service Area through a combination of its own  
10 facilities and the resale of services. Life Wireless is willing to accept carrier of last resort  
11 obligations throughout the universal service areas in which Life Wireless is designated as an ETC  
12 by the Commission.

13 **2. Advertising and Outreach Program S.C. Code Reg. 103-690(C)(a)(1)(C) & (a)(7).**

14  
15 A. Life Wireless' South Carolina Advertising and Outreach plan is attached as Exhibit BL-2  
16 to my testimony. The FCC adopted specific requirements for Lifeline advertising in its Lifeline  
17 Reform Order with which the Company will comply.<sup>15</sup> Within the deadline provided in the  
18 Lifeline Reform Order, the Company will include the following information regarding its Lifeline  
19 service on all marketing materials describing the service: (1) it is a Lifeline service; (2) Lifeline is a  
20 government assistance program; (3) the service is non-transferable; (4) only eligible consumers  
21 may enroll in the program; (5) the program is limited to one discount per household; (6)  
22 documentation necessary for enrollment; (7) Life Wirelesses' name (the ETC); and, (8) notice  
23 that consumers who willfully make a false statement in order to obtain the Lifeline benefit can

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<sup>14</sup> 47 C.F.R. § 54.202(a)(1) also requires the submission of a five-year plan demonstrating how high-cost universal service support will be used to improve the ETC's coverage, service quality and capacity. This requirement, however, is inapplicable to this application, since Telrite is not seeking high-cost assistance.

<sup>15</sup> Lifeline Reform Order at ¶1275-82.

1 be punished by fine or imprisonment or can be barred from the program.<sup>16</sup> These statements  
2 will be included in all print, audio, video and web materials (including social networking media)  
3 used to describe or enroll customers in the Company's Lifeline service offering, as well as the  
4 Company's application forms and certification forms.<sup>17</sup> This specifically includes the Company's  
5 website and outdoor signage.<sup>18</sup>

6 Life Wireless is fully prepared to and will comply with the federal and state  
7 requirements that it advertise the availability of its services throughout its Service Area using  
8 media of general distribution.<sup>19</sup> Life Wireless will publicize the availability of Lifeline service in a  
9 manner reasonably designed to reach those likely to qualify for the service.<sup>20</sup> Life Wireless  
10 advertises the availability and prices of its services through a variety of media including its  
11 extensive retail distribution network which includes retail locations in South Carolina and  
12 nationwide as well as from Life Wireless' website, www.lifewireless.com, and other online  
13 outlets. Accordingly, more low-income South Carolina residents will be made aware of the  
14 opportunities afforded to them under the Lifeline program and will be able to take advantage of  
15 those opportunities by subscribing to Life Wireless' service. A sample of Life Wireless' planned  
16 advertising is attached to its Petition as **Exhibit "E."** S.C. Code Reg. 103-690(C)(a)(7) requires an  
17 acknowledgement that the Company will advertise in a media of general distribution the  
18 availability of its Lifeline services and the applicable charges. Life Wireless has made this  
19 acknowledgement in the Affidavit of Life Wirelesses' President Brian Lisle attached to its Petition  
20 as **Exhibit "H."**

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16 Lifeline Reform Order at ¶ 275.

17 Id.

18 Id.

19 47 C.F.R. § 54.201(d)(2).

20 47 C.F.R. §§ 54.405(b).

1           **3. Ability to Remain Functional in Emergency Situation S.C. Code Reg. 103-690(C)(a)(2)**  
2           **and 47 C.F.R. § 54.202(a)(2).**

3  
4       A.           Life Wireless has the ability to remain functional in emergency situations. Since Life  
5           Wireless is providing service to its customers through the use of facilities obtained from other  
6           carriers it is able to provide to its customers the same ability to remain functional in emergency  
7           situations as currently provided by those carriers to their own customers, including access to a  
8           reasonable amount of back-up power to ensure functionality without an external power source,  
9           re-routing of traffic around damaged facilities, and the capability of managing traffic spikes  
10          resulting from emergency situations.

11                 Life Wireless and its underlying carrier, AT&T, have created back-up systems to ensure  
12          full functionality in the event of a loss of power or network functionality. And, Life Wirelesses’  
13          switching facilities are housed in a carrier-class data center with fully redundant power and  
14          HVAC, a controlled temperature and humidity environment, fire-threat detection and  
15          suppression, year-round critical monitoring and secure access with biometric security. The  
16          facility features redundant generators and redundant fiber optic connectivity. The data center is  
17          a reinforced concrete building located in a secure area and collocated with the area electrical  
18          utility headquarters. It is powered from separate paths independent of any one electrical  
19          generation plant. All systems within the facility are implemented on redundant servers, each  
20          with redundant data network and power.

21           **4. Consumer Protection and Commitment to Provide Quality Service. S.C. Code Reg. 103-**  
22           **690(C)(a)(3) and 47 C.F.R. 54.202(a)(1),(2).**

23  
24       A.           An ETC applicant must demonstrate that it will satisfy all consumer protection and  
25           service quality standards pursuant to S.C. Code Reg. 103-690(C)(a)(3). The Commission and the  
26           FCC have determined that a commitment by wireless applicants to comply with Consumer Code  
27           for Wireless Service – adopted by the Cellular Telecommunications and Internet Association’s

1 (“CTIA”) satisfies this requirement.<sup>21</sup> Per the requirements of 47 C.F.R. §202(a)(1)(i) Life Wireless  
2 certifies that it will comply with the service requirements applicable to the low-income support  
3 it receives as a result of designation as an ETC for purposes of receiving Lifeline.

4 Life Wireless will satisfy all consumer privacy protection standards as provided in 47  
5 C.F.R. §64, Subpart U, as applicable, and will protect Customer Proprietary Network Information  
6 (“CPNI”) as required by state and federal law and will certify compliance with the same on an  
7 annual basis.<sup>22</sup>

8 On an annual basis Life Wireless will certify its compliance with the CTIA Consumer Code  
9 and report the number of consumer complaints or trouble reports per 1,000 handsets or access  
10 lines consistent with the FCC’s *USF Order*<sup>23</sup> and S.C. Code Reg. 103-690(B)(a) and (b)(4). Life  
11 Wireless in general commits to satisfying all applicable state and federal requirements related to  
12 consumer protection and service quality standards.

13 **5. Comparable Local Usage / Rate Plan. S.C. Code Reg. 103-690(C)(a)(4).**

14  
15 A. As described previously Life Wireless offers a local usage plan comparable to that  
16 offered by the ILEC in the Service Area for which it seeks designation as required by S.C. Code  
17 Reg. 103-690(C)(a)(4).

18 **6. Equal Access. S.C. Code Reg. 103-690(C)(a)(5) and 47 C.F.R. § 54.202(a)(5).**

19  
20 A. Life Wireless will provide equal access to long distance carriers, to the extent to which it  
21 is able to do so<sup>24</sup>. South Carolina requires an acknowledgement from a prospective ETC that it  
22 may be required to “provide equal access to long distance carriers in the event no other eligible

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<sup>21</sup> 47 C.F.R. § 54.202(a)(3). See certification attached as Exhibit H.

<sup>22</sup> See Exhibit H.

<sup>23</sup> Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776 at ¶ 4 (1997) (“USF Order”).

<sup>24</sup> The FCC’s rules no longer require an applicant to acknowledge that the FCC may require it to provide equal access to long distance carriers. See *Lifeline and Linkup Reform Order*, p. 208, revised § 54.202(a).

1 telecommunications carrier is providing equal access within the designated service area.” S.C.  
2 Code Reg. 103-690(C)(a)(5) and 47 C.F.R. § 54.202(a)(5). Life Wireless has provided the requisite  
3 acknowledgment, and reaffirms its commitment through this testimony. See Affidavit of Brian  
4 Lisle attached to Life Wireless’ Petition **Exhibit “I.”**

5 **7. Universal Service Support. S.C. Code Reg. 103-690(C)(a)(6).**

- 6 A. As described earlier, Section 214(e)(1)(A) of the Act requires an ETC to offer the services  
7 supported by federal universal service support mechanisms throughout its designated service  
8 area “either using its own facilities or a combination of its own facilities and resale of another  
9 carrier’s services.”<sup>25</sup> As described earlier, Life Wireless will provide wireless service through  
10 resale and is pursuing Blanket Forbearance from the FCC.

11 **8. Financial and Technical Showing. 47 C.F.R. §54.201(h).**

- 12 A. Life Wireless has the financial and technical capability to provide Lifeline service. As  
13 part of the Lifeline Reform Order, the FCC amended its rules to require a carrier seeking  
14 designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of  
15 providing the supported Lifeline service in compliance with all of the low-income program  
16 rules.<sup>26</sup> Life Wireless satisfies these criteria.

17 Life Wireless generates substantial revenues from non-Lifeline services and has access  
18 to capital from its investors. Life Wireless currently provides prepaid wireless services to more  
19 than 650,000 customers. Consequently, the Company has not relied, and will not be relying  
20 exclusively on Lifeline reimbursement for its operating revenues. *See also* Confidential Petition

21 **Exhibit “H”**

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<sup>25</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>26</sup> In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6 2012) (“Lifeline Reform Order”).

1           **9. Designation of Life Wireless as an ETC in the State of South Carolina Serves the Public**  
2           **Interest. S.C. Code Reg. 103-690(c)(b).**

3  
4       A.           The FCC has previously held that designating a competitor as an ETC in areas served by  
5           non-rural ILECs is *per se* in the public interest.<sup>27</sup> The Commission must determine that Life  
6           Wirelesses' designation is in the public interest by considering (1) the benefits of increased  
7           consumer choice and (2) the unique advantages and disadvantages of Life Wirelesses' service  
8           offering pursuant to S.C. Code Reg. § 103-690(C)(b). These are the same factors used by the  
9           FCC.<sup>28</sup> Life Wireless submits that the public interest benefits of designating Life Wireless as an  
10          ETC include (1) a larger local calling area and expanded coverage area via multiple underlying  
11          carriers (as compared to traditional wireline carriers and single wireless carriers); (2) the  
12          convenience, portability, and security afforded by mobile telephone service; (3) the opportunity  
13          for customers to control cost by receiving a pre-set amount of flat-rate monthly airtime; (4) the  
14          ability to purchase additional low-cost usage at multiple convenient locations in the event that  
15          included usage has been exhausted; (5) the ability of users to use the supported service to send  
16          and receive "SMS" or text messages as well as the option to send data and access the public  
17          internet; and (6) 911 and, where available, enhanced 911 service in accordance with current FCC  
18          requirements. In addition, the inclusion of domestic telephone toll calling as a part of Life  
19          Wireless' flat-rate wireless offering allows consumers to avoid the risks of becoming burdened  
20          with significant and unexpected per-minute charges for domestic telephone toll and overage  
21          charges. These per-minute overruns form the basis of a substantial number of consumer  
22          complaints to state and federal regulators. Accordingly, Life Wireless' offerings will help to  
23          reduce this burden on public utility regulatory boards by obviating the cause for such  
24          complaints.

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<sup>27</sup> See *Cellco Partnership*, 16 FCC Rcd, at 45.

<sup>28</sup> 47 U.S.C. § 54.202(c).

1           The FCC has long acknowledged the benefits to consumers of being able to choose from  
2 a variety of telecommunications providers and the resulting variety of telecommunications  
3 services they provide.<sup>29</sup> This is of particular interest in cases where wireless providers like Life  
4 Wireless seek to provide service as an alternative to the ILEC. In the *Highland Cellular* case, the  
5 FCC recognized and affirmed that some households may not have access to the public switched  
6 network as provided by the ILEC.<sup>30</sup> The wireless service offered by Life Wireless will provide  
7 these consumers with a convenient and affordable alternative to traditional  
8 telecommunications service that can be used while at home and away from home.

9           Designation of Life Wireless as an ETC also creates competitive pressure for other  
10 wireline and wireless providers within the proposed service areas. In order to remain  
11 competitive in low-income markets, therefore, all carriers will have greater incentives to  
12 improve networks, increase service offerings and lower prices. This results in improved  
13 consumer services and, consistent with federal law, benefits consumers by allowing Life  
14 Wireless to offer the services designated for support at rates that are “just, reasonable, and  
15 affordable.”<sup>31</sup>

16           Designation of Life Wireless as an ETC benefits the public interest of low-income  
17 consumers throughout Life Wireless’ Service Area. Approval of Life Wireless’ ETC Application  
18 will serve the public interest by increasing participation of qualified consumers in the Lifeline  
19 program in the State of South Carolina. Life Wireless will offer a unique, easy to use, competitive  
20 and highly affordable wireless telecommunications service, which it will make available to  
21 qualified consumers who either have no other service alternatives or who choose a wireless  
22 prepaid solution in lieu of more traditional services. Life Wireless’ Lifeline service is available

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<sup>29</sup> See e.g. *Specialized Common Carrier Services*, 29 FCC2d 870 (1971).

<sup>30</sup> Federal-State Joint Bd. on Universal Serv., *Highland Cellular, Inc., Memorandum Opinion and Order*, 19 F.C.C.R. 6422 (2004).

<sup>31</sup> 47 U.S.C. § 254(b)(1).

1 with no credit check, deposit requirement, minimum service periods, or early termination fees.  
2 These services will be an attractive and affordable alternative to all consumers, without regard  
3 to age, residency, or credit worthiness.

4 Designation of Life Wireless as an ETC will not pose any adverse effect in the growth in  
5 the high-cost portions of the USF, nor will it create or contribute to an erosion of high-cost  
6 funding from any rural or non-rural telephone company. The FCC reaffirmed this position when  
7 it stated that “the potential growth of the fund associated with high-cost support distributed to  
8 competitive ETCs’ is not relevant to carriers seeking support associated with the low-income  
9 program.”<sup>32</sup> The FCC also recognized that the total effect of additional low-income-only ETC  
10 designations would have a minimal impact on the fund when it stated that “any increase in the  
11 size of the fund would be minimal and would be outweighed by the benefit of increasing eligible  
12 participation in the Lifeline program, furthering the statutory goal of providing access to low-  
13 income consumers.”<sup>33</sup> It is also vital to recognize that in the case of Lifeline support, an ETC  
14 receives USF support *only* for the customers it obtains. In the scenario where a competitive ETC  
15 obtains a Lifeline customer from another ETC, only the “capturing” ETC provides Lifeline  
16 discounts and as a result, only the “capturing” ETC receives support reimbursement.

17 **Q. PLEASE DESCRIBE HOW LIFE WIRELESS WILL DETERMINE A POTENTIAL CUSTOMER’S**  
18 **ELIGIBILITY FOR LIFE LINE BENEFITS.**

19 A. The application form that will be used by Life Wireless requires each applicant to  
20 provide the following information:

- 21 • Name
- 22 • Primary residential address – and whether the address is a permanent address
- 23 • Billing address (if this differs from the residential address)
- 24 • Last four digits of social security number
- 25 • Birth date

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<sup>32</sup> 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, 20 FCC Rcd 15095 (2005) (“TracFone Forbearance Order”) at ¶ 17.

<sup>33</sup> TracFone Forbearance Order, at ¶ 17.

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After the FCC’s Duplicate Enrollment National Database is established, Life Wireless will provide the above information to the database, together with the following additional information:

- Telephone number (for Lifeline handset)
- Date of service initiation
- Date of de-enrollment (if applicable)
- Means by which the subscriber qualified for support
- Amount of Lifeline support received by the subscriber each month

**Q. PLEASE DESCRIBE HOW LIFE WIRELESS WILL ENSURE THAT EACH HOUSEHOLD RECEIVES ONLY ONE LIFELINE SUBSIDY.**

A. All service orders will be checked real time on the front end in Life Wireless’ internal database, and its service provider CGM's inter-company duplicate database (some 30 companies participate in this database) for any duplicate. Furthermore, CGM checks Life Wireless’ records for internal duplicates every month prior to submitting its FCC Form 497 to USAC. Life Wireless will terminate Lifeline benefits to any customer that does not demonstrate continued eligibility within 30 days following the date of an impending termination letter.

**Q. PLEASE DESCRIBE HOW LIFE WIRELESS WILL TREAT CUSTOMERS THAT PROVIDE A TEMPORARY ADDRESS.**

A. If a subscriber provides Life Wireless with a temporary address, the Company will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Company within 30 days, the subscriber will be de-enrolled from the Lifeline program.

**Q. WILL LIFE WIRELESS USE THIRD PARTY AGENTS TO SELL WIRELESS SERVICE IN SOUTH CAROLINA? IF SO, HOW WILL LIFE WIRELESS ENSURE THE AGENTS’ COMPLIANCE WITH LIFELINE RULES IN ACCORDANCE WITH THE REQUIREMENTS SET FORTH IN THE FCC’S LIFELINE AND LINK UP REFORM ORDER (FCC 12-11)?**

1 A. Yes, Life Wireless uses third party agents to market its wireless Lifeline services. All  
2 employees or representatives ("Company personnel") that conduct in-person enrollments are  
3 trained regarding the eligibility and certification requirements in the Lifeline Reform Order,  
4 including the one-per-household requirement, and told to inform potential customers of those  
5 requirements. New Company personnel undergo an initial mandatory training session where  
6 they are given training materials, a field training manual and compliance manual, as well as  
7 shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline  
8 program. If Life Wireless cannot determine a prospective subscriber's eligibility for Lifeline by  
9 assessing income databases or program eligibility databases, Company personnel will review  
10 documentation establishing eligibility pursuant to the Lifeline rules. All personnel who interact  
11 with actual or prospective customers will be trained to assist Lifeline applicants in determining  
12 whether they are eligible to participate based on the federal and state-specific income-based  
13 and/or program-based criteria. These personnel will be trained to answer questions about  
14 Lifeline eligibility, and will review required documentation to determine whether it satisfies the  
15 Lifeline Reform Order and state-specific eligibility requirements using state-specific checklists.

16 **Q. WILL LIFE WIRELESS RE-CERTIFY THE ELIGIBILITY OF ITS CUSTOMERS?**

17 A. Life Wireless commits to annually re-certify all subscribers in accordance with S.C. Code  
18 Reg. 103-690.1E(a)(4) and 47 C.F.R. § 54.410(f) of the FCC Rules, as recently modified by the FCC  
19 in its *Lifeline Reform Order*. Life Wireless will provide the results of its annual re-certification  
20 efforts pursuant to the Commission's Rules. In addition, by the end of 2012, Life Wireless will  
21 re-certify the eligibility of all of its Lifeline subscribers as of June 1, 2012 and report the results  
22 to USAC by January 31, 2013. The Company will undertake this re-certification on a rolling basis  
23 throughout the year. Furthermore, Life Wireless commits to submit an annual certification

1 confirming the existence of policies and procedures to confirm consumer eligibility and the  
2 Company's compliance with such policies and procedures.

3 **Q. PLEASE DESCRIBE HOW LIFE WIRELESS WILL TREAT CUSTOMERS THAT ARE FOUND TO BE NO**  
4 **LONGER ELIGIBLE FOR LIFELINE BENEFITS.**

5 A. Consistent with the requirements in Section 54.405(e) of the FCC Rules, as recently  
6 modified by the FCC in its *Lifeline Reform Order*, Life Wireless will terminate Lifeline benefits to  
7 any customer that does not demonstrate continued eligibility within 30 days following the date  
8 of an impending termination letter. Life Wireless will provide impending termination letters to:  
9 (a) any customer that fails to demonstrate their continued eligibility as part of the Company's  
10 annual re-certification efforts; (b) any customer the Company believes, on a reasonable basis,  
11 no longer qualifies for the service under the eligibility criteria identified in the FCC Rules; or (c)  
12 any customer that has no usage for 60 consecutive days, as described in more detail below. Life  
13 Wireless will also terminate (within five business days) Lifeline benefits to any customer or  
14 household the Company has been notified to be receiving Lifeline benefits from more than one  
15 carrier.

16 **Q. PLEASE DESCRIBE ANY ADDITIONAL MEASURES LIFE WIRELESS WILL IMPLEMENT TO PREVENT**  
17 **WASTE, FRAUD AND ABUSE.**

18  
19 **A. Non-usage Policy**

20 Life Wireless will implement a non-usage policy whereby it will de-enroll Lifeline  
21 customers that have not used the Company's Lifeline service for 60 consecutive days. Life  
22 Wireless will notify its subscribers at service initiation about the usage requirements and the de-  
23 enrollment and deactivation that will result following non-usage in any consecutive 60-day  
24 period of time. If no usage appears on a Life Wireless Lifeline customer's account during any  
25 consecutive 60-day period, Life Wireless will deactivate Lifeline services for that customer. An  
26 account will be considered active if during any 60-day period the authorized subscriber does at

1 least one of the following: makes a monthly payment; purchases minutes from the Company to  
2 add to his or her existing pre-paid Lifeline account; completes an outbound call; answers an  
3 incoming call from anyone other than the Company, its representative, or agent; or affirmatively  
4 responds to a direct contact from the Company confirming that he or she wants to continue  
5 Lifeline service.

6 **Customer Education with Respect to Duplicates**

7 To supplement its verification and certification procedures, and to better ensure that  
8 customers understand the Lifeline service restrictions with respect to duplicates, Life Wireless  
9 will implement measures and procedures to prevent duplicate Lifeline benefits being awarded  
10 to the same household. These measures entail additional emphasis in written disclosures as  
11 well as live due diligence, and will help ensure that only eligible consumers enroll in the program  
12 and that those consumers are fully informed of the rules and requirements of the program.

13 In its marketing materials, including application forms, on its web site, and in its direct  
14 contact with applicants, the Company will emphasize in plain, easily comprehensible language  
15 that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per  
16 household; (3) a household is defined, for purposes of the Lifeline program, as any individual or  
17 group of individuals who are living together at the same address and share income and  
18 expenses; and (4) a household is not permitted to receive Lifeline benefits from multiple  
19 providers.

20 **Q. DOES LIFE WIRELESS CURRENTLY COLLECT AND REMIT 911 FEES FOR ITS WIRELESS SERVICES IN**  
21 **ALL STATES IN WHICH IT OPERATES?**

22  
23 **A.** Yes. Life Wireless collects 911 fees and remits them to the counties that it serves.  
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**Q. WILL LIFE WIRELESS SUPPORT THE STATE UNIVERSAL SERVICE FUND IF IT RECEIVES DESIGNATION?**

A. Yes, once it begins offering Lifeline ETC services in South Carolina, Life Wireless will contribute to the state Universal Service Fund as required. Life Wireless will file an annual report, a gross receipts reports, copies of its Form 497 submitted to USAC, and annual reports required by the Commission’s regulations. Life Wireless will also provide the ORS with such information as it may need in connection with its duties to administer the state USF.

**Q. HAS LIFE WIRELESS ENTERED INTO A STIPULATION WITH THE ORS IN THIS CASE?**

A As of the date of this testimony, the ORS and Life Wireless have entered into a stipulation which I understand will be signed and submitted by counsel with this testimony.

**Q. ARE YOU FAMILIAR WITH THE TERMS OF THE STIPULATION?**

Yes, I am.

**Q. IS THE STIPULATION ACCEPTABLE TO LIFE WIRELESS, AND WILL THE COMPANY BE ABLE TO COMPLY WITH ITS TERMS?**

Yes, the terms of the Stipulation are consistent with Life Wireless’ duties as an ETC under state and federal law and the Company will abide by them.

**Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

A. Yes.

**EXHIBIT BL-1**

**LIFE WIRELESS**

**AMENDED COMPLIANCE PLAN  
SUBMITTED TO THE FCC ON NOVEMBER 29, 2012**

**KELLEY DRYE & WARREN LLP**

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November 29, 2012

**VIA ECFS**

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

Re: Telrite Corporation Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On March 12, 2012, Telrite Corporation (“Telrite”) submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>1</sup> On April 10, Telrite submitted a revised version with a minor revision to its Model Application/Certification Form, included as Exhibit A to its Compliance Plan. On April 27, July 2, July 27 and November 28 Telrite further revised and supplemented its Compliance Plan.

Telrite has further revised its Compliance Plan to state that customers will receive three texts per voice minute for both the 125 minute and 250 minute Lifeline plans (p. 23) and add a “top-up” plan of unlimited talk and text for one day for \$4.95 (p.23). Nothing else in the Compliance Plan has been changed.

Telrite hereby re-submits its complete Compliance Plan with the revisions described above. Based on the minor nature of these changes, and in consideration of the extraordinary efforts Telrite is undertaking with respect to compliance programs, fraud detection and prevention, and public awareness and education, Telrite reiterates its request for expeditious

<sup>1</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary  
November 29, 2012  
Page Two

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

Respectfully submitted,



John J. Heitmann  
Joshua T. Guyan

*Counsel to Telrite Corporation*

cc: Kim Scardino  
Divya Shenoy  
Garnet Hanly

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

In the Matter of  Telecommunications Carriers Eligible to Receive Universal Service Support  Lifeline and Link Up Reform and Modernization  Telrite Corporation	WC Docket No. 09-197  WC Docket No. 11-42
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**TELRITE CORPORATION COMPLIANCE PLAN**

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

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<sup>1</sup> The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Telrite Corporation (corporate name), Life Wireless (trade name) and Telrite Holdings, LLC (holding company). Telrite owns 10 percent of Life Wireless Holdings, LLC, which is 50 percent owned by Puretalk Holdings, LLC. Therefore, Puretalk Holdings, LLC is not an affiliate of Telrite, however, Telrite’s “top-up” minutes are sold under the Pure Unlimited brand.

<sup>2</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Telrite will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.<sup>3</sup>

The Company will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.<sup>4</sup> This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that Telrite will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Telrite 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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<sup>3</sup> See *Lifeline Reform Order*, ¶ 368. Although the Company 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. Telrite 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 Telrite provides service using its own facilities for purposes of a state universal service program.

<sup>4</sup> In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. See Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. See Public Notice, DA 12-828.

## ACCESS TO 911 AND E911 SERVICES<sup>5</sup>

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

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

The Company's existing practices currently provide access to 911 and E911 services for all customers. Telrite uses AT&T as its underlying network provider/carrier. has direct contracts for wireless services from AT&T, as opposed to purchasing minutes through an intermediary. AT&T routes 911 calls from the Company's customers in the same manner as 911 calls from AT&T's own retail customers. To the extent that AT&T is certified in a given PSAP territory, this 911 capability will function the same for the Company. Telrite 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. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

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<sup>5</sup> See Compliance Plan Public Notice at 3.

<sup>6</sup> See *Lifeline Reform Order*, ¶ 373.

**E911-Compliant Handsets.** Telrite will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. The Company uses phones from AT&T that have been through a stringent certification process with AT&T, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

#### COMPLIANCE PLAN

### **I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE<sup>7</sup>**

#### **A. Policy**

Telrite complies with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers are required to demonstrate eligibility based at least on: (1) household income at or below 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 new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

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<sup>7</sup> See Compliance Plan Public Notice at 3.

## **B. Eligibility Determination**

More than 99 percent of Telrite's customer enrollment is done in-person, as opposed to over the phone or the Internet. Event locations are scheduled using various market or industry data resources. Telrite directs a team of representatives that survey and evaluate potential event locations across its service areas. Additionally, Telrite partners with community organizations, such as civic organizations, churches and food banks to host events in the communities it serves. Representatives are only permitted to enroll Lifeline customers within the borders of the states where Telrite is designated as an ETC. Further, to ensure that Telrite can track the location of its enrollment initiatives, all representatives conducting a Telrite enrollment event are required to electronically check in with Telrite and provide their address before the representatives can submit orders and enroll customers in Telrite's Lifeline service.

All enrollments performed in-person are completed electronically. The use of "paper forms" is prohibited, however, at all times laminated copies of the Lifeline application/certification forms are available for customers to review. Telrite's electronic process uses MiFi hotspots, laptop or net book computers, electronic signature pads and a bar code scanner to complete enrollment in real-time. The electronic order process provides Telrite the opportunity to perform several database checks in real-time during the enrollment process. Specifically, Telrite's systems validate and normalize addresses via "Melissa" data; perform an internal address duplicate check (to ensure that the prospective customer or someone at that address does not currently have Lifeline service from Telrite); perform an external duplicate check using CGM, LLC's ("CGM's") intercompany duplicate database ("IDD")<sup>8</sup>; and confirm the customer's

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<sup>8</sup> CGM's IDD enables participating ETCs to seed the database with subscriber lists, as well as to check the database against the subscriber lists of participating ETCs. Telrite is the largest ETC participating in this important self-regulatory initiative. Further

identity via Lexis Nexis (using the prospective customer's last name, date of birth and the last four digits of the customer's Social Security number). In addition, Telrite will check each applicant's government-issued photo identification for this purpose.

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

If Telrite cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.<sup>9</sup> All personnel who interact with actual or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

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demonstrating Telrite's leadership and commitment to defending the Lifeline program, Telrite also has produced three PSAs designed to educate the public about the Lifeline program. By January 2013, these PSAs will have been aired over 2,700 times collectively across the following markets: Atlanta, Baltimore, Charleston (WV), Chicago, Deluth, Little Rock, Minneapolis, New Orleans, Providence and St. Louis.

<sup>9</sup> See *Lifeline Reform Order*, ¶ 100; sections 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.<sup>10</sup> Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.<sup>11</sup>

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.<sup>12</sup>

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.<sup>13</sup> In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The

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<sup>10</sup> See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

<sup>11</sup> *Id.* and section 54.410(c)(1)(i)(B).

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

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

Company will not retain a copy of this documentation, except where state rules require such retention.<sup>14</sup> Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at the Company's corporate offices in Covington, GA. A Telrite employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement.

In addition, Telrite will not enroll customers at retail locations where Telrite does not have an agency agreement with the retailer. Further, Telrite will require an agent retailer to have any employees involved in the enrollment process go through the standard Telrite field representative training, same as it would for any other agent. By establishing agency relationships with all of its field representatives, including future retail outlets, Telrite meets the "deal directly" requirement adopted in the TracFone Forbearance Order.<sup>15</sup>

The Commission determined in the *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.'"<sup>16</sup> Because Telrite is responsible for the actions of all of its employees and agents, including those enrolling customers in any Telrite owned or affiliated retail locations, and a Telrite employee

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

<sup>15</sup> 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).

<sup>16</sup> *Lifeline Reform Order*, ¶ 110.

will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, the Company always “deals directly” with its customers to certify and verify the customer’s Lifeline eligibility.

De-Enrollment for Ineligibility. If Telrite has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any applicable state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>17</sup> A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form. 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 five business days. Customers can make this request by calling the Company's customer service number and will not be required to submit any documents.

### **C. Subscriber Certifications for Enrollment**

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.<sup>18</sup> The Company shares the Commission’s concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company’s customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form

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

<sup>18</sup> *Lifeline Reform Order*, ¶ 61; section 54.410(a).

containing disclosures, and collecting certain information and certifications as discussed below.<sup>19</sup> Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.<sup>20</sup>

Applicants that do not complete the form in person will be required to return the signed application/certification form to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.<sup>21</sup>

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 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.<sup>22</sup>

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

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<sup>19</sup> See Model Application/Certification Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

<sup>20</sup> See Income Eligibility Worksheet, included as Exhibit B.

<sup>21</sup> See *Lifeline Reform Order*, ¶ 123.

<sup>22</sup> See *id.*, ¶ 121; section 54.410(d)(1).

enroll in the program.<sup>23</sup>

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

Information Collection. The Company will also 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<sup>25</sup>); (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.<sup>26</sup>

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,<sup>27</sup> the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the

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<sup>23</sup> See section 54.405(c).

<sup>24</sup> See *Lifeline Reform Order*, ¶ 257.

<sup>25</sup> See *id.*, ¶ 87.

<sup>26</sup> See section 54.410(d)(2).

<sup>27</sup> See *Lifeline Reform Order*, ¶¶ 168-69; section 54.419.

Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize the Company 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. The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit

program, including to USAC to be used in a Lifeline program database.<sup>28</sup>

#### **D. Annual Verification Procedures**

Telrite will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>29</sup> The Company will notify each participating Lifeline customer annually that he or she must confirm his or her continued eligibility in accordance with the applicable requirements. Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.<sup>30</sup>

2012 Verification. Telrite will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.<sup>31</sup> The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

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<sup>28</sup> See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. *See id.*

<sup>29</sup> *See Lifeline Reform Order*, ¶ 120.

<sup>30</sup> *See id.*, ¶ 145.

<sup>31</sup> *See id.*, ¶ 130.

Verification De-Enrollment. Telrite will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.<sup>32</sup> The Company will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

**E. Activation and Non-Usage**

Telrite will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by a method established by Telrite. For activation of a handset provided to a new customer at an event or "in the field", successful applicants are provided a functioning handset and instructed to dial 770-200-1000 to complete the activation process. Such calls are free of charge to the applicant. To activate a handset provided to a successful applicant by mail, upon receipt of the handset, the applicant must contact Telrite customer service at 888-543-3620 or 888-543-3640 to activate the service. The customer must verify their last name, date of birth and last four digits of their Social Security number. The customer must also verify that he or she ordered the Lifeline service. The phone is activated only after that verification process has been completed.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, Telrite will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice

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<sup>32</sup> See *id.*, ¶ 142; section 54.54.405(e)(4).

period will result in de-enrollment.<sup>33</sup> Subscribers can “use” the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber’s plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.<sup>34</sup>

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and Telrite will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>35</sup>

#### **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, the Company will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the database when it becomes available, Company personnel will 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.<sup>36</sup>

Telrite conducts background checks on all Company personnel interacting with existing and

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<sup>33</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

<sup>34</sup> See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

<sup>35</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

<sup>36</sup> See *id.*

potential Lifeline customers and they must pass a complete onboarding process that includes a photo identification check. All such Company personnel also undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. New Company personnel complete an initial mandatory three-hour training session conducted by corporate trainers that are employees of Telrite where they are given training materials, a field training manual and a compliance manual, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program. These training documents are regularly updated to reflect the requirements of the *Lifeline Reform Order* and this Compliance Plan, and they are provided to existing Company personnel. All Company personnel must have these manuals with them when conducting enrollment or other activities for Telrite. Further, Telrite holds weekly compliance updates and weekly refresher/continuing education conference calls and all Company personnel have access to a Telrite portal with a large resource section containing policies, tips and procedures for Lifeline enrollment.

Telrite also has Compliance and Field Operations teams that investigate possible waste, fraud and abuse by Company personnel or representatives and either resolve the issues or escalate them. Solutions can include additional training, deactivation of credentials, termination and possible legal action. To discover potential waste, fraud and abuse, the Compliance Department is responsible for tracking and monitoring data entry, orders and behavior of Company personnel engaging in Lifeline enrollments, as well as conducting data audits (tracking statistics on orders to look for irregularities), customer quality calls, secret shopping, no-notice field audits and photo audits (random audits requiring the representative to take a photo of the event set-up). Telrite's Compliance Department is itself subject to outside audits by CGM.

Finally, on or before May 4, 2012, all Telrite agents and representatives received a Training Bulletin and Fraud Policy, which Telrite also filed with the Commission, designed to remind all Company personnel engaged in enrollment of Lifeline applicants regarding their obligations to explain the one-per-household restriction to Lifeline applicants.

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, Telrite will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.<sup>37</sup>

One-Per-Household. Telrite will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household<sup>38</sup> through the use of its application and certification forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for the Company’s Lifeline service, Telrite validates and normalizes the address provided via the MELISSA database and then the name, address, date of birth and last four digits of the Social Security number are entered into Telrite’s

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<sup>37</sup> See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *id.*, ¶¶ 189-195; section 54.404(b)(6). Further, Company will update each subscriber’s information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

<sup>38</sup> A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

internal duplicate database to ensure that it does not already provide Lifeline-supported service to that individual or another person at the same address.<sup>39</sup> If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission’s one-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).<sup>40</sup> Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.<sup>41</sup>

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant’s understanding of what constitutes “Lifeline-supported services,” and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. Telrite also asks each customer whether they are receiving Lifeline service from one of the other major Lifeline providers in the state (*e.g.*, SafeLink, Assurance). Further, at the time of enrollment, Telrite checks each applicant

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<sup>39</sup> See *Lifeline Reform Order*, ¶ 78.

<sup>40</sup> See *id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

<sup>41</sup> See *Lifeline Reform Order*, ¶ 89.

against an internal database, as well as a pooled duplicates database established by CGM. Finally, Telrite will continue to participate in the In-Depth Validation process with the Commission and USAC to locate and address duplicates between ETCs in various states until the national database is in place.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (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 documentation is necessary for enrollment; and (7) Telrite's name (the ETC).<sup>42</sup> These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.<sup>43</sup> This specifically includes the Company's website ([www.lifewireless.com](http://www.lifewireless.com)) and outdoor signage.<sup>44</sup> A sample of the Company's marketing materials is included as Exhibit C. In addition, the Company's application/certification form 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 the Company does not seek reimbursement from the Fund without a subscriber's consent, Telrite will certify, as part of each reimbursement request, that it is in

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<sup>42</sup> See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

<sup>43</sup> *Id.*

<sup>44</sup> *Id.*

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.<sup>45</sup> Further, the Company will transition the submission of its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month, and inform USAC, to the extent necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.<sup>46</sup> In addition, the Company will keep accurate records as directed by USAC<sup>47</sup> and as required by new section 54.417 of the Commission’s rules.

#### **H. Annual Company Certifications**

Telrite will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers’ documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;<sup>48</sup> (2) is in compliance with all federal Lifeline certification procedures;<sup>49</sup> and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.<sup>50</sup>

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state

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<sup>45</sup> See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

<sup>46</sup> See *Lifeline Reform Order*, ¶¶ 302-306.

<sup>47</sup> See *id.*

<sup>48</sup> See *id.*, ¶ 126; section 54.416(a)(1).

<sup>49</sup> See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

<sup>50</sup> See section 54.416(a)(3).

commission and the relevant Tribal governments (for subscribers residing on Tribal lands).<sup>51</sup> Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>52</sup>

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,<sup>53</sup> the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.<sup>54</sup> The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>55</sup> Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.<sup>56</sup>

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<sup>51</sup> See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

<sup>52</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

<sup>53</sup> See *Lifeline Reform Order*, section 54.422(c).

<sup>54</sup> See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

<sup>55</sup> See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

<sup>56</sup> See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

## **I. Cooperation with State and Federal Regulators**

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

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;<sup>57</sup>
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe<sup>58</sup> is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

## **II. Description of Lifeline Service Offerings<sup>59</sup>**

Telrite will offer its Lifeline service in the states where it is designated as an ETC<sup>60</sup> and throughout the coverage area of its underlying provider AT&T. The Company's Lifeline offering in each state where the Company has been designated as an ETC provides customers with their choice of 125 or 250 anytime prepaid minutes per month at no charge. Minutes do not

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<sup>57</sup> The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

<sup>58</sup> See section 54.405(e)(1).

<sup>59</sup> See Compliance Plan Public Notice at 3.

<sup>60</sup> The Company is currently designated as an ETC in Arkansas, Illinois, Louisiana, West Virginia, Rhode Island, Puerto Rico, Missouri, Maryland, Georgia & Minnesota.

expire for the 125 minute plan and unused minutes are rolled over to the next month. Unused minutes for the 250 minute plan do not roll over. Text messaging is available at the rate of:

- 125 Minute Plan: 1/3 minute (*i.e.*, 3 SMS texts per voice minute)
- 250 Minute Plan 1/3 minute (*i.e.*, 3 SMS texts per voice minute)

Lifeline customers can purchase additional bundles of minutes in denominations of \$10.00, \$25.00, \$4.95, \$7.95, \$12.95, \$21.49 and \$29.95.<sup>61</sup> Airtime, when used for standard cellular calls, is valued at and will be decremented at the following rates:

- 1) \$10.00 denomination - \$0.099 per minute of use;
- 2) \$25.00 denomination - \$0.0708 per minute of use;
- 3) \$4.95 denomination – 1 day Unlimited Talk and SMS;
- 4) \$7.95 denomination - 3 day Unlimited Talk and SMS;
- 5) \$12.95 denomination - 1 week Unlimited Talk and SMS;
- 6) \$21.95 denomination – 2 weeks Unlimited Talk and SMS;
- 7) \$29.95 denomination – 1 month Unlimited Talk and SMS;

Airtime “top-up” minutes are available for purchase at the Company’s retail locations, through any Money Gram location and on the Company’s website.<sup>62</sup> Additional information regarding the Company’s plans, rates and services can be found on its website: [www.lifewireless.com](http://www.lifewireless.com).

In addition to free voice services, Telrite’s Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, Voice Mail, No Roaming charges and free access to Customer Care by dialing 611 from customers’ Life Wireless handset or by dialing 1-888-543-3620 from any wireline phone. All

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<sup>61</sup> The \$29.95 rate for unlimited talk and text is available only to Life Wireless customers that purchase online or by calling Telrite customer service. The retail rate available in stores is \$42.95, which is set to be reduced to a yet undetermined rate.

<sup>62</sup> Top-up minutes are provided using the PureTalk USA and Pure Unlimited brands, by Puretalk Holdings, LLC, a sister company of Telrite with common ownership, though not technically an affiliate.

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.

### **III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation<sup>63</sup>**

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.<sup>64</sup> The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding.

Telrite has been offering Lifeline service to customers since October, 2010. Telrite also offers several other telecommunication services in addition to its Lifeline service. In 2011, the wireline services offered by Telrite produced substantial net income. This revenue was generated from more than 30,000 customers of Telrite's local and long distance service, which Telrite has been providing for over 10 years. In sum, Telrite has access to sufficient funds to run its business and is not solely dependent on reimbursements from the Fund. Telrite recently entered into a consent decree with the Enforcement Bureau relating to an investigation begun in

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<sup>63</sup> See Compliance Plan Public Notice at 3.

<sup>64</sup> See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

2004.<sup>65</sup> The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

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."<sup>66</sup> Telrite certifies that it will comply with the service requirements applicable to the support the Company receives.<sup>67</sup> Telrite provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings provide its customers with minutes of use for local service at no charge to the customer. The Company will offer a set number of minutes of local exchange service free of charge to its subscribers. Telrite's current Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

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

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<sup>65</sup> See Telrite Corporation, File No. EB-05-1H-2348, Order and Consent Decree, DA 12-612 (rel. Apr. 18, 2012).

<sup>66</sup> Compliance Plan Public Notice at 3.

<sup>67</sup> 47 C.F.R. § 54.202(a)(1).

Finally, Telrite will not provide toll limitation service (“TLS”), which allows low income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.<sup>68</sup>

#### **IV. Conclusion**

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

Respectfully submitted,



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*Counsel to Telrite Corporation*

November 29, 2012

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<sup>68</sup> See *Lifeline Reform Order*, ¶ 230.

# **EXHIBIT A**



# Life Wireless

## Georgia Wireless Lifeline Service Application and Certification

Mail or Fax completed and signed form to

Telrite Corporation / Life Wireless

PO Box 2840 Covington, GA 30015

FAX: 1-866-770-6110 / EMAIL: [lwforms@lifewireless.com](mailto:lwforms@lifewireless.com)

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

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

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

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

- Supplemental Nutrition Assistance Program (SNAP)
- Section 8 Federal Public Housing Assistance (FPHA)
- Medicaid (not Medicare)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Income at or below 135% of Federal Poverty Guidelines
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards)
- Senior Citizen Low Income Discount Offered by Local Gas or Power Company

**Tribal eligibility:**

I hereby certify that I reside on Federally-recognized Tribal lands.

**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)**

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_

State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Address is (choose one):  Permanent  Temporary

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

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_

State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Multiple households sharing and address:**

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

**Activation and usage requirement disclosures:** This service is a prepaid service and you must personally activate it by calling 770-200-1000. To keep your account active, *you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than*

**Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company.** If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

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

**Authorizations:**

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

**Additional certifications:** I hereby certify, under penalty of perjury, that **(check each box):**

- I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- I am not listed as a dependent on another person's tax return (unless over the age of 60)
- The address listed below is my primary residence, not a second home or business
- If I move to a new address, I will provide that new address to the Company within 30 days
- If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- The information contained in this certification form is true and correct to the best of my knowledge

**Applicant's Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**For Agent Use Only (check only 1 eligibility category and only 1 box under that category; do not copy or retain documentation):**

**Documents Acceptable Proof for Income-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, or
- A divorce decree, child support award, or other official document containing income information for at least three months time.

**Documents Acceptable Proof for Program-Eligibility**

(choose 1 from each list A and B below)

**List A - Choose 1**

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Section 8 Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards)
- Senior Citizen Low Income Discount Offered by Local Gas or Power Company

**List B - Choose 1**

- Program Participation card / document
- Prior year's statement of benefits
- Notice letter of participation
- Other official qualifying document: \_\_\_\_\_

Last 4 digits of Document from List B \_\_\_\_\_

Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Expiration Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Applicant Account Number	Rep / Agent Signature

# **EXHIBIT B**



## Life Wireless Lifeline Service Application Income Eligibility Worksheet

Individuals in all states 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	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

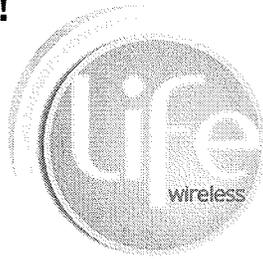
**Applicants must list the number of individuals in the applicant's household on the Lifeline application form.** Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- 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 containing income information for at least three months time

**This is a Lifeline service provided Telrite Corporaton. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.**

# **EXHIBIT C**

**Welcome!**



Life Wireless Customer you will receive FREE Minutes each month on your anniversary date. Unused minutes will roll-over to the next month and never expire as long as your account remains active. Must make at least one call each 60 days to keep your service active.\*

**Life Wireless Features:**

- Nationwide Calling
- Text Messaging
- Caller ID
- Voicemail
- Rollover Minutes
- Affordable Recharge Plans
- Free 911 Service



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

**Recharge With Pure Unlimited**

If you need more than the allotted free minutes each month, Life Wireless has partnered with Pure Unlimited to offer you recharge cards in the following denominations.

3 Day Unlimited Talk & Text	1 Week Unlimited Talk & Text	2 Week Unlimited Talk & Text	1 Month Unlimited Talk & Text
<b>\$7.95</b>	<b>\$12.95</b>	<b>\$21.49</b>	<b>\$42.95</b>

**\$10 and \$25 Recharge Cards Also Available  
at 9.9¢ per minute and 5¢ per text.**

Pure Unlimited recharge cards are available in many retail establishments or online at

[www.lifewireless.com](http://www.lifewireless.com)

We Accept **MoneyGram**   
International Money Transfer

Receive Code: 7924

## Things to know:

- ☞ Lifeline benefits are limited to a single line of service per household. You may not receive multiple Lifeline or Link Up discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both.
- ☞ Customers must present Photo ID and Proof of Benefit to obtain service.
- ☞ **To complete the activation process you must power on your phone and place a call to 770-200-1000.**
- ☞ If you have further questions or concerns, Life Wireless Customer Service is ready to help. Agents are available 7 days a week from 8:00 am to Midnight EST at

**1-888-543-3620**

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



[www.lifewireless.com](http://www.lifewireless.com)

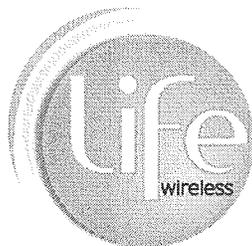
Telrite Corporation is an Eligible Telecommunications Carrier (ETC), doing business as Life Wireless.



\*Rollover is contingent upon the minutes program and that not all free minute plans contain rollover minutes

Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs. 1 - current or prior year's statement of benefits from a qualifying state, federal or Tribal program. 2 - a notice letter of participation in a qualifying state, federal or Tribal program. 3 - program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof). 4 - other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program. Income eligibility: Prior Year's state, federal or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment / Workmen's comp statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months time. Life Wireless will NOT retain a copy of this documentation. \$42.95 Unlimited cards is good for 1 month of Unlimited Talk & Text. \$21.49 Unlimited card is good for 14 days of Unlimited Talk & Text. \$12.95 Unlimited card is good for 7 days of Unlimited Talk & Text. \$7.95 Unlimited card is good for 3 days of Unlimited Talk & Text. Upon expiration of Unlimited Card, you must add a new recharge card of any denomination to continue service. \$10 and \$25 recharge cards available at a rate of 9.9¢ per minute and 5¢ per text. Pure Unlimited recharge cards valid for Pure Unlimited or Life Wireless phones/service only. Rates and fees subject to change.

# FREE PHONE



# WITH FREE MONTHLY SERVICE!

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

### Life Wireless Features:

- Nationwide Calling
- Text Messaging
- Caller ID
- Voicemail
- Rollover Minutes
- Affordable Recharge Plans



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

## Need more minutes? Recharge With Pure Unlimited

As Low As **\$7.95**



1 Week Unlimited Talk & Text	2 Week Unlimited Talk & Text	1 Month Unlimited Talk & Text
<b>\$12.95</b>	<b>\$21.49</b>	<b>\$42.95</b>

\$10 and \$25 Recharge Cards Also Available!

## 1-888-543-3620



Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs. 1 - current or prior year's statement of benefits from a qualifying state, federal or Tribal program. 2 - a notice letter of participation in a qualifying state, federal or Tribal program. 3 - program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof). 4 - other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program. Income eligibility: Prior Year's state, federal or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment / Workmen's comp statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months time. Life Wireless will NOT retain a copy of this documentation. \$42.95 Unlimited card is good for 1 month of Unlimited Talk & Text. \$21.49 Unlimited card is good for 14 days of Unlimited Talk & Text. \$12.95 Unlimited card is good for 7 days of Unlimited Talk & Text. \$7.95 Unlimited card is good for 3 days of Unlimited Talk & Text. Upon expiration of Unlimited Card, you must add a new recharge card of any denomination to continue service. \$10 and \$25 recharge cards available at a rate of 9.9¢ per minute and 5¢ per text. Pure Unlimited recharge cards valid for Pure Unlimited or Life Wireless phones/service only. Rates and fees subject to change.

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

# FREE CELL PHONE

# with FREE Monthly Service



## 1-888-543-3620

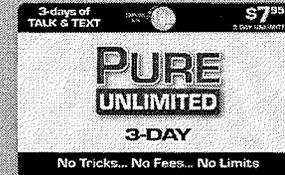
[www.LifeWireless.com](http://www.LifeWireless.com)

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



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

## Affordable UNLIMITED Recharge Plans



As Low As  
**\$7.95**

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

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

## Come to the LIFE WIRELESS booth for more details!

**EXHIBIT BL – 2**

**LIFE WIRELESS**

**SOUTH CAROLINA ADVERTISING AND MARKETING PLAN**

**DECEMBER 6, 2012**

# Telrite Corporation

## South Carolina Advertising and Marketing Plan

Version 1.1 – Revised December 6, 2012

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

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

### **Community Outreach**

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

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

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

### **Site Events**

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

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

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

## **FCC and State Compliant Banners and Signs**

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

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

For all marketing materials, we use the following verbiage:

### Verbiage in LARGE PRINT:

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

### Verbiage in FINE PRINT:

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

Please see **Exhibit “C”**

## Website

[www.lifewireless.com](http://www.lifewireless.com) is the company website where customers can:

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

Life Wireless prominently displays on the:

- Home Page
  - Life Wireless™ is a Lifeline supported program that provides free cellular service each month for eligible customers. Life Wireless™ also provides plans for people who do not qualify for assistance. Life Wireless™ offers:
    - Nationwide calling
    - Text Messaging
    - Caller ID
    - Voicemail
    - Rollover Minutes\*
    - No Long Distance or Roaming Charges
    - Recharge Plans

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

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

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

- Our Mission Statement

Please see **Exhibit “D”**

- About Lifeline Page

- Low Income Assistance

- Low Income telephone assistance provides a discount on a subscriber's monthly bill and/or a reduction to the customary charge to commence service (activation fees). Eligibility is based on income or participation in assistance programs related to income.

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

- (1) Temporary Assistance to needy Families (TANF)
- (2) Supplemental Security Income (SSI)
- (3) Food Stamps
- (4) Medicaid/South Carolina Healthy Connections
- (5) Federal Public Housing Assistance (FPHA)
- (6) Low-Income Home Energy Assistance Program (LIHEAP)
- (7) or an income that is at or below 135% of Federal Poverty Guidelines

- WHAT IS LIFELINE SUPPORT?

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

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

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

- CTIA Consumer Code for Wireless Service

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

- (1) DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS
- (2) MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE
- (3) PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE
- (4) ALLOW A TRIAL PERIOD FOR NEW SERVICE
- (5) PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING
- (6) SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS
- (7) PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS

- (8) PROVIDE READY ACCESS TO CUSTOMER SERVICE
- (9) PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES
- (10) ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Please see **Exhibit "E"**

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

### **Television**

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

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

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

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

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

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

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

<http://youtu.be/jXVxbh6Y1dE>

## Exhibit "A"

**FREE  
PHONE**



**WITH FREE  
MONTHLY  
SERVICE!**

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

**Life Wireless Features:**

- Nationwide Calling
- Text Messaging
- Caller ID
- Voicemail
- Rollover Minutes
- Affordable Recharge Plans



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

*Need more minutes?*

As Low As **\$7.95**



1 Week Unlimited Talk & Text	2 Week Unlimited Talk & Text	1 Month Unlimited Talk & Text
<b>\$12.95</b>	<b>\$21.49</b>	<b>\$29.95</b>

**\$10 and \$25 Recharge Cards Also Available!**

**1-888-543-3620**



Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in one of the federal assistance programs, 1 - current or prior year's statement of benefits from a qualifying state, federal or Tribal program, 2 - a notice letter of participation in a qualifying state, federal or Tribal program, 3 - program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof), 4 - other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program, Income eligibility; Prior year's state, federal or Tribal tax return, current income statement from an employer or paycheck, Social Security statement of benefits, Veterans Administration statement of benefits, Retirement/pension statement of benefits, Unemployment / Workmen's comp statement of benefits, Federal or Tribal notice letter of participation in General Assistance, Divorce decree, child support award, or other official document containing income information for at least three (3) months time. Life Wireless will NOT retain a copy of this documentation. \$29.95 Unlimited card is good for 1 month of Unlimited Talk & Text. \$21.49 Unlimited card is good for 14 days of Unlimited Talk & Text. \$12.95 Unlimited card is good for 7 days of Unlimited Talk & Text. \$7.95 Unlimited card is good for 3 days of Unlimited Talk & Text. Upon expiration of Unlimited Card, you must add a new recharge card of any denomination to continue service. \$5 and \$10 recharge cards available and text messages are 3 per Minute of Talk. Life Wireless recharge cards valid for Pure Unlimited or Life Wireless phones/service only. Rates and fees subject to change.

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

## Exhibit "B"



## Exhibit "C"

### **ATTENTION CUSTOMERS**

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

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

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

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

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

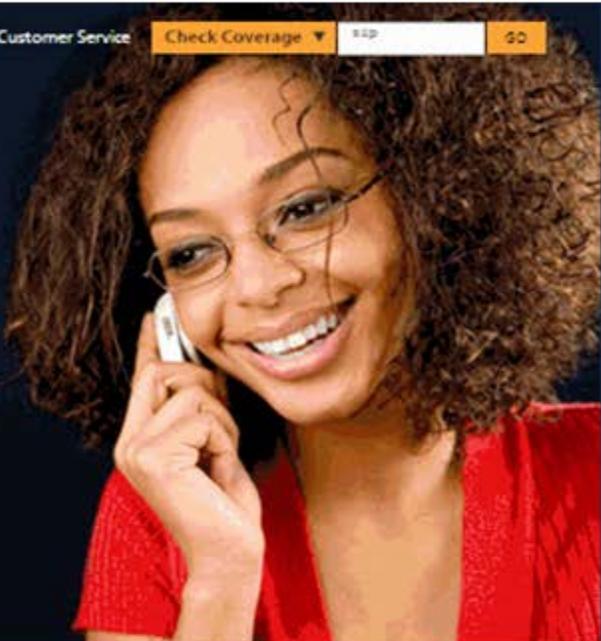
## Exhibit "D"

Customer Login | Representative Login | Customer Service | Check Coverage



# Talk, Text, Live with Life Wireless.

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



About Lifeline | Phones & Rates | Sign Up Today | Add Minutes



**Visit Our Media Press Room**  
[CLICK HERE!](#)



**NEW UNLIMITED TALK & TEXT**  
for **\$29.95**  
[Learn More](#)



**Request a Life Wireless Event at Your Location**  
[Click here for more information](#)

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

- Nationwide calling
- Text Messaging
- Caller ID
- Voicemail
- Rollover Minutes\*
- No Long Distance or Roaming Charges
- Recharge Plans

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

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

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

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

\* Not all plans include Rollover Service.

**OUR MISSION STATEMENT**

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

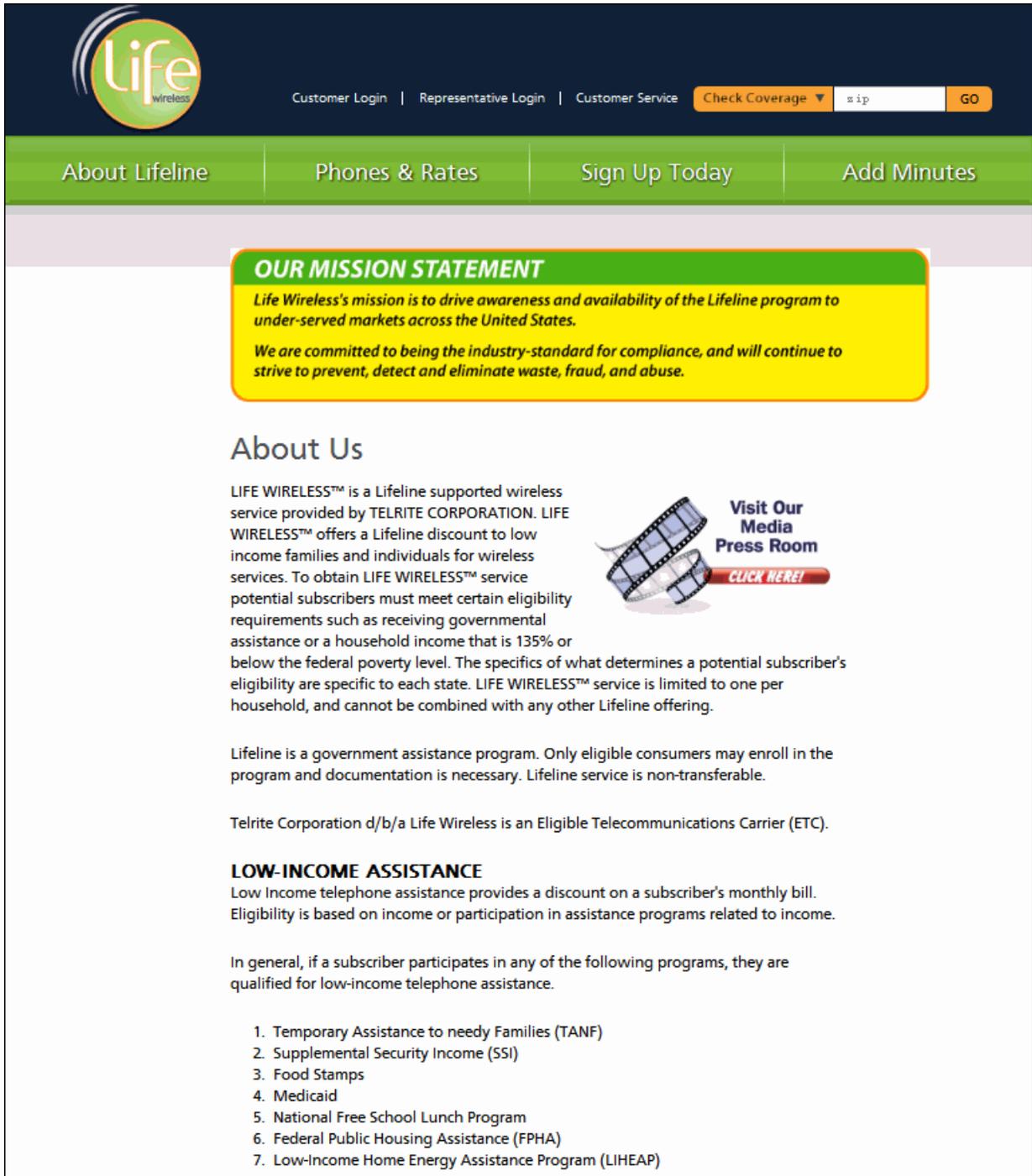
*We are committed to being the industry-standard for compliance, and will continue to strive to prevent, detect and eliminate waste, fraud, and abuse.*

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Web Development by Infomedica

Contact Us | Terms of Use | Terms of Service | Privacy Policy | Customer Login | Representative Login  
About Life Wireless | Media | Phones & Rates | Sign Up Today | Add Minutes | Customer Service



## Exhibit "E" - 1 of 2



The screenshot shows the top navigation bar of the Life Wireless website. The logo is on the left, followed by links for 'Customer Login', 'Representative Login', and 'Customer Service'. On the right, there is a 'Check Coverage' dropdown menu, a search box with 'sip' entered, and a 'GO' button. Below the navigation bar is a green menu with four items: 'About Lifeline', 'Phones & Rates', 'Sign Up Today', and 'Add Minutes'. The main content area features a yellow box with the heading 'OUR MISSION STATEMENT' and two paragraphs of text. Below this is the 'About Us' section, which includes a paragraph of text, a graphic of a film strip with a 'CLICK HERE!' button, and a link to 'Visit Our Media Press Room'. The 'About Us' section also contains a paragraph about Lifeline, a paragraph about Telrite Corporation, and a section titled 'LOW-INCOME ASSISTANCE' with a paragraph and a numbered list of seven programs.

**OUR MISSION STATEMENT**

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

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

### About Us

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



Visit Our Media Press Room  
[CLICK HERE!](#)

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

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

#### LOW-INCOME ASSISTANCE

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

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

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

## Exhibit "E" - 2 of 2

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

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

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

### WHAT IS LIFELINE SUPPORT?

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

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

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

### CTIA CONSUMER CODE FOR WIRELESS SERVICE

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

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

### JOIN THE LIFE WIRELESS TEAM

To learn about job opportunities please forward a cover letter and resume to:

[careers@lifewireless.com](mailto:careers@lifewireless.com)

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