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August 15, 2014

**VIA OVERNIGHT DELIVERY**

Florida Public Service Commission  
Office of Commission Clerk  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
(850) 413-6770

**REDACTED**

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COMMISSION  
CLERK

Re: 2014 Annual Lifeline Data Request (i-wireless, LLC)  
**CONFIDENTIAL TREATMENT REQUESTED**

To Whom It May Concern:

i-wireless, LLC (herein "i-wireless") hereby files an original and two (2) copies of its responses to the 2014 Annual Lifeline Data Request.

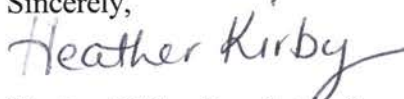
**i-wireless hereby requests confidential treatment of certain information identified herein (Exhibit A, Response to No. 1-16, Exhibit B, Response to No. 12 and Exhibit C, Response to No. 14) pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.** I have enclosed one original copy and two edited copies in which the information claimed as confidential is blacked out.

Please update the regulatory contact for i-wireless as follows:

Sam Bailey, Senior Compliance Manager  
One Levee Way, Suite 3104  
Newport, KY 41071  
Phone: 513-550-2755  
Email: [sam.bailey@iwirelesshome.com](mailto:sam.bailey@iwirelesshome.com)

If you have any questions or need additional information, please do not hesitate to contact me at 770-232-9200 or [hkirby@telecomcounsel.com](mailto:hkirby@telecomcounsel.com). Thank you for your attention to this matter.

Sincerely,



Heather Kirby, Regulatory Specialist  
Lance J.M. Steinhart, P.C.  
Attorneys for i-wireless, LLC

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
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IDM \_\_\_\_\_  
TEL Redacted  
CLK \_\_\_\_\_

## CLEC AND WIRELESS LIFELINE DATA REQUEST 2014

To assist the Public Service Commission (PSC) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 15, 2014.**

**For items 1 through 16, please provide the data for the fiscal year July 1, 2013, through June 30, 2014.**

**For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.**

**Please treat all responses as CONFIDENTIAL**

1. The number of residential access lines in service each month.

**Response: See Confidential Exhibit A**

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

**Response: See Confidential Exhibit A**

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

**Response: \$9.25 federal Lifeline subsidy per customer per month.**

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

**Response: See Confidential Exhibit A**

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

**Response: See Confidential Exhibit A**

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines, or Lifeline customers moved to Transitional Lifeline.

**Response: See Confidential Exhibit A**

7. The number of customers participating in Transitional Lifeline each month.

**Response: See Confidential Exhibit A**

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

**Response: See Confidential Exhibit A**

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

**Response: None, i-wireless does not resale access lines to other carriers.**

10. Description of your company's procedures for enrolling customers in the Lifeline program. Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.
- b. Procedures used to process applications received directly from customers.
- c. Procedures used to process applications received through the PSC on-line process.
- d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.
- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

**Response:**

- (a) Applications are transferred on a daily basis from the Office of Public Counsel into the CGM Enrollment Compliance Platform (ECP) application. The company's internal Review Team verifies the accuracy and consistency of the proof of documentation, including proof of eligibility and proof of valid identification for every application received. The enrollment platform automatically conducts internal and external (NLAD) system validation checks prior to proceeding with enrollment. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application.
- (b) Applications received directly from a potential customer requesting Lifeline service are immediately provided to the internal Review Team. Upon receipt, the Review Team will enter the customer's demographic information into the CGM ECP application. After completing the internal and external (NLAD) system validation checks, the Review Team will verify the accuracy and consistency of the proof of documentation, including proof of eligibility and proof of valid identification included with the applicant's materials. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application.
- (c) Applications are received into the enrollment platform on a daily basis from the PSC-online process. After the applications have been received in the enrollment

platform, the enrollment platform will perform internal and external (NLAD) system checks. Based on the results of the system checks then the customer will be either be automatically approved or denied.

(d) Applications are transferred on a daily basis from the Department of Children and Family Services into the CGM Enrollment Compliance Platform (ECP) application. The company's internal Review Team verifies the accuracy and consistency of the proof of documentation, including proof of eligibility and proof of valid identification for every application received. The enrollment platform automatically conducts internal and external (NLAD) system validation checks prior to proceeding with enrollment. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application.

(e) All applications are reviewed within 24 hours of receipt. A customer's Lifeline benefit will automatically be credited to their account upon successful activation and use of the handset.

11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:

- a. Time period between initial certification and annual certification.
- b. Method(s) used to verify customer eligibility.
- c. Frequency of periodic certification.

(a) Per the requirements of §54.416, i-wireless mandates that all Lifeline end-users to recertify their eligibility annually. Recertification begins the year after the customer initially enrolled in the Lifeline Program and continues on an annual basis while the customer is actively enrolled in the Lifeline Program.

(b) i-wireless customers may complete the recertification process directly from the handset via the WAP (Wireless Application Protocol) deck, by calling an automated Interactive Voice Response (IVR) system, by speaking with a Customer Care agent, by logging into their account on the company's website or by submitting a completed recertification form via US mail.

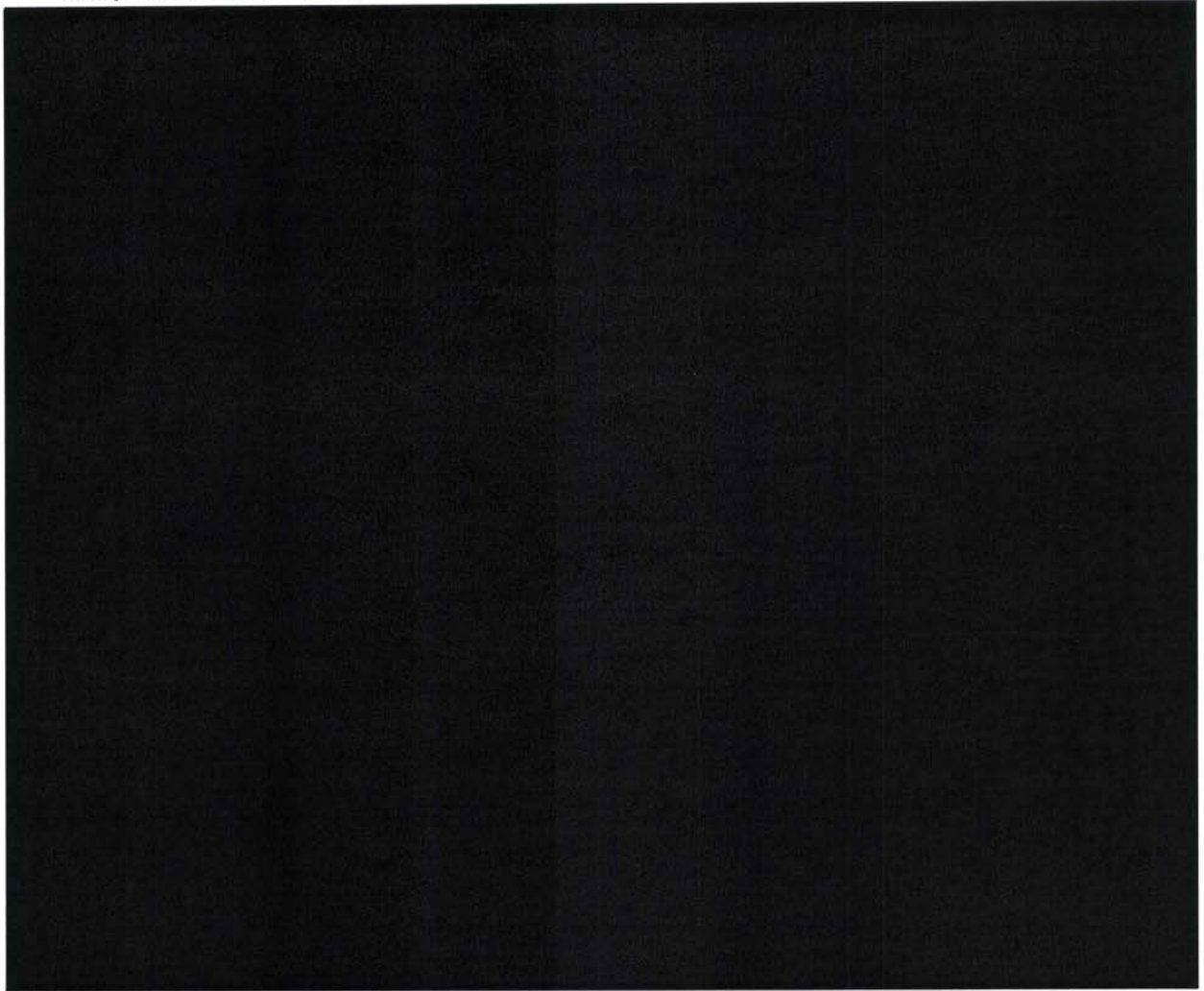
(c) Annually.

12. Description of your company's procedures for Lifeline. Include the following in your response:

- a. Internal procedures for promoting Lifeline.
- b. Outreach and educational efforts involving participation in community events.
- c. Outreach and educational efforts involving mass media (newspaper, radio, television).  
CLEC and WIRELESS Lifeline Data Request 2014 July 15, 2014 2

- d. Copies of Lifeline outreach materials of your company.
- e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

**Response: CONFIDENTIAL**



13. Description of procedures associated with enrollment of Lifeline customers by resellers of telecommunications services through resale agreements. Include the following in your response:
- a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.
  - b. Initial and annual certification procedures and requirements.

- c. Any other terms and conditions applicable to resellers offering Lifeline that are not imposed on resellers who do not offer Lifeline.

**Response: Not applicable**

14. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

**Response: i-wireless provides a comprehensive training to all of its customer service representatives that includes the following:**

1. Overview of the Lifeline program
2. Eligibility guidelines for participation in the Lifeline program by state, including qualifying programs and federal poverty household income requirements
3. One-per-household requirement
4. Annual Certification/Verification requirement
5. Activation and Usage requirement
6. Summary of Access Wireless Lifeline product offering & rate plan options
7. Step-by-step instructions on the enrollment process using the CGM Enrollment Compliance Platform application
8. Acceptable forms of Identification & Proof of Program Participation/NLAD

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See attached Training Guide for CGM Enrollment Compliance Platform application.

(Exhibit C)

15. Please provide any link on your Web site that provides Lifeline information.

**Response:**

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

[www.accesswireless.com/program/view/FL](http://www.accesswireless.com/program/view/FL)

16. Does your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

**Response: Not applicable**

**EXHIBIT A**

**CONFIDENTIAL AND PROPRIETARY**

CONFIDENTIAL AND PROPRIETARY

Exhibit A

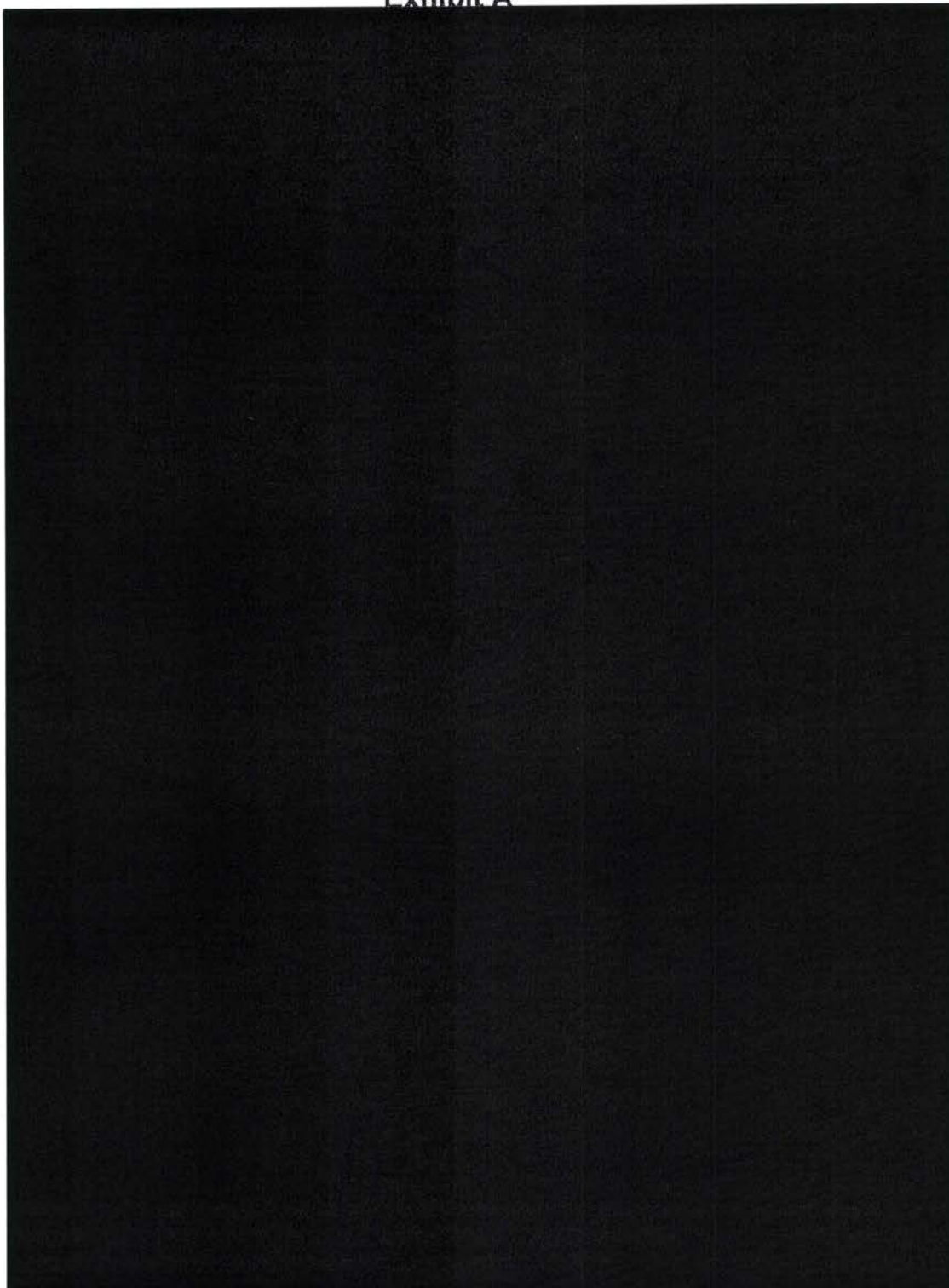
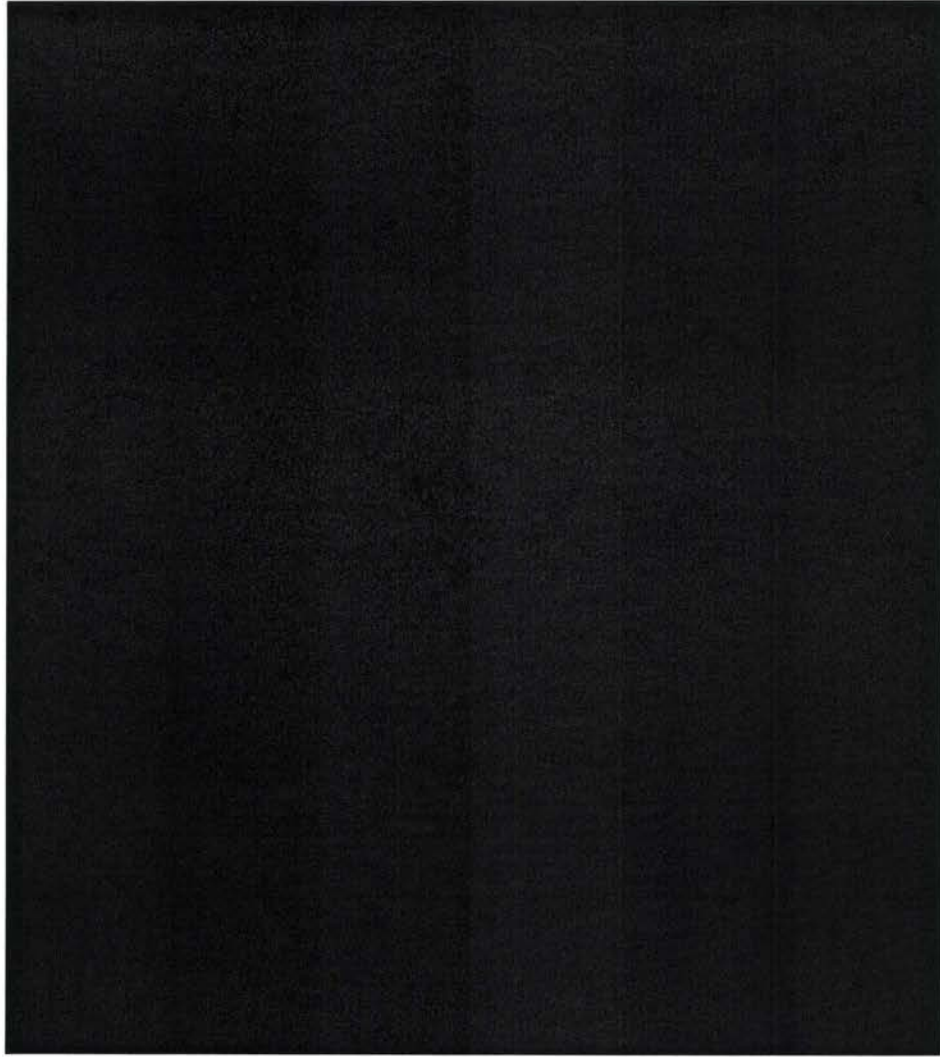
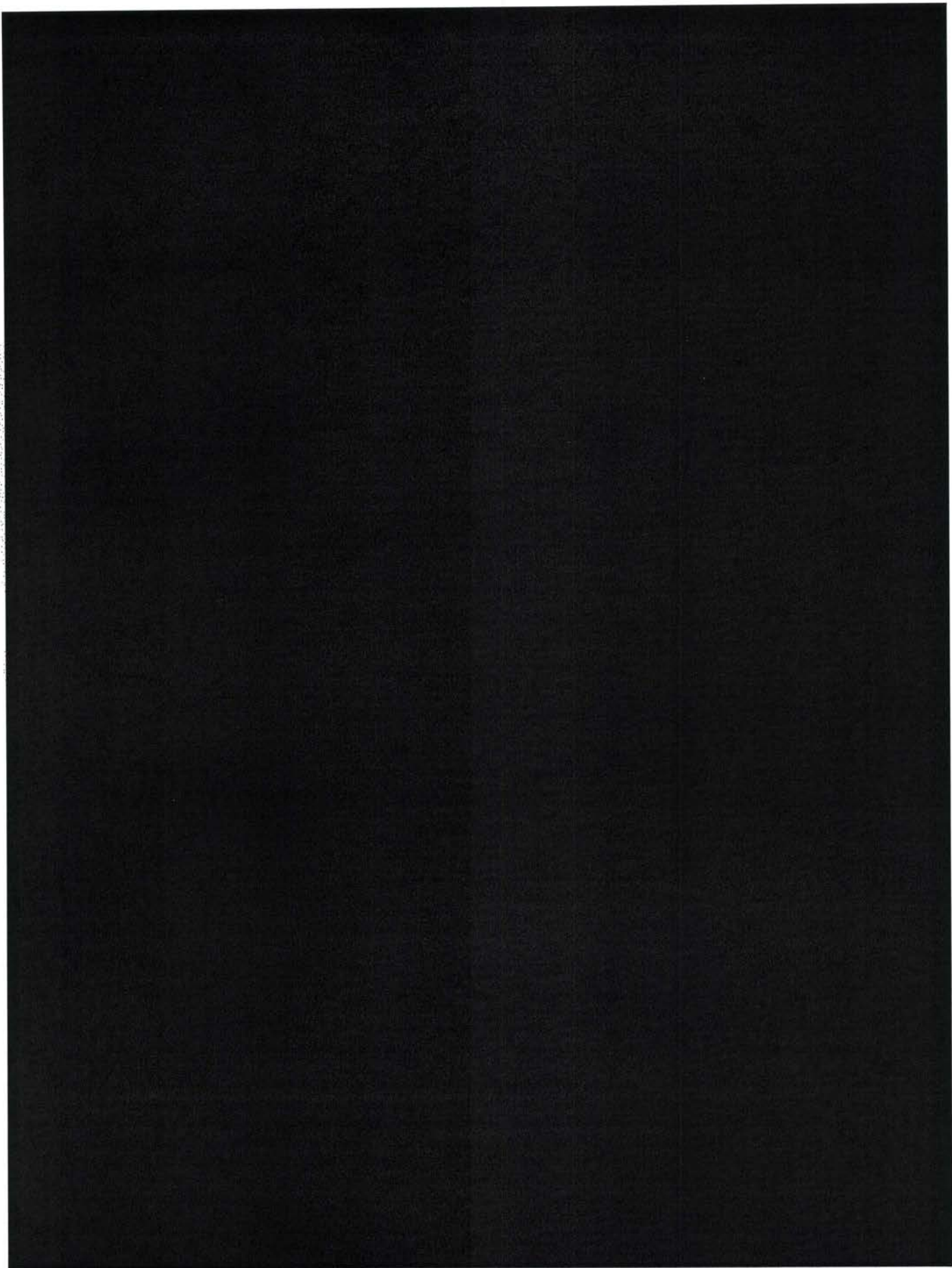




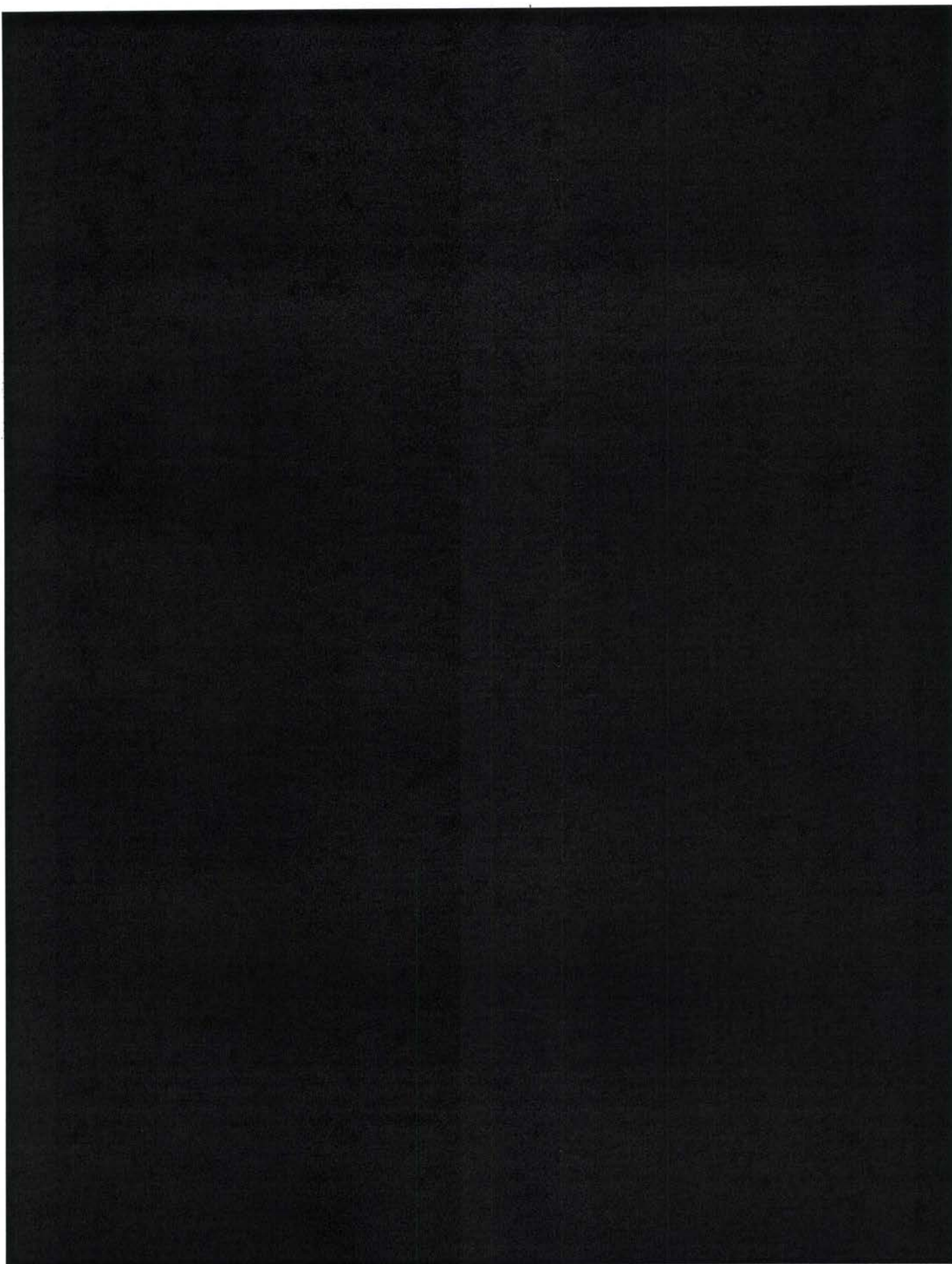
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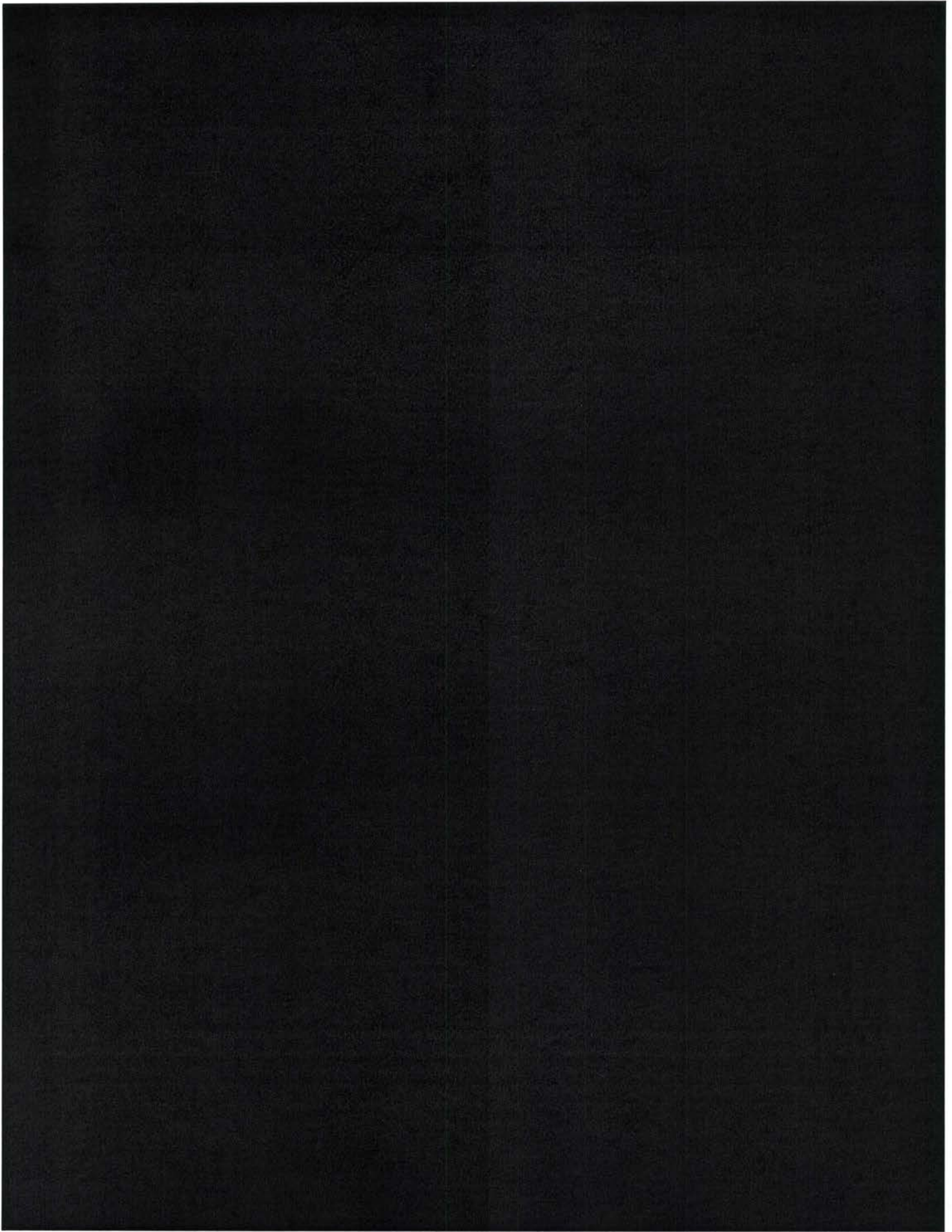


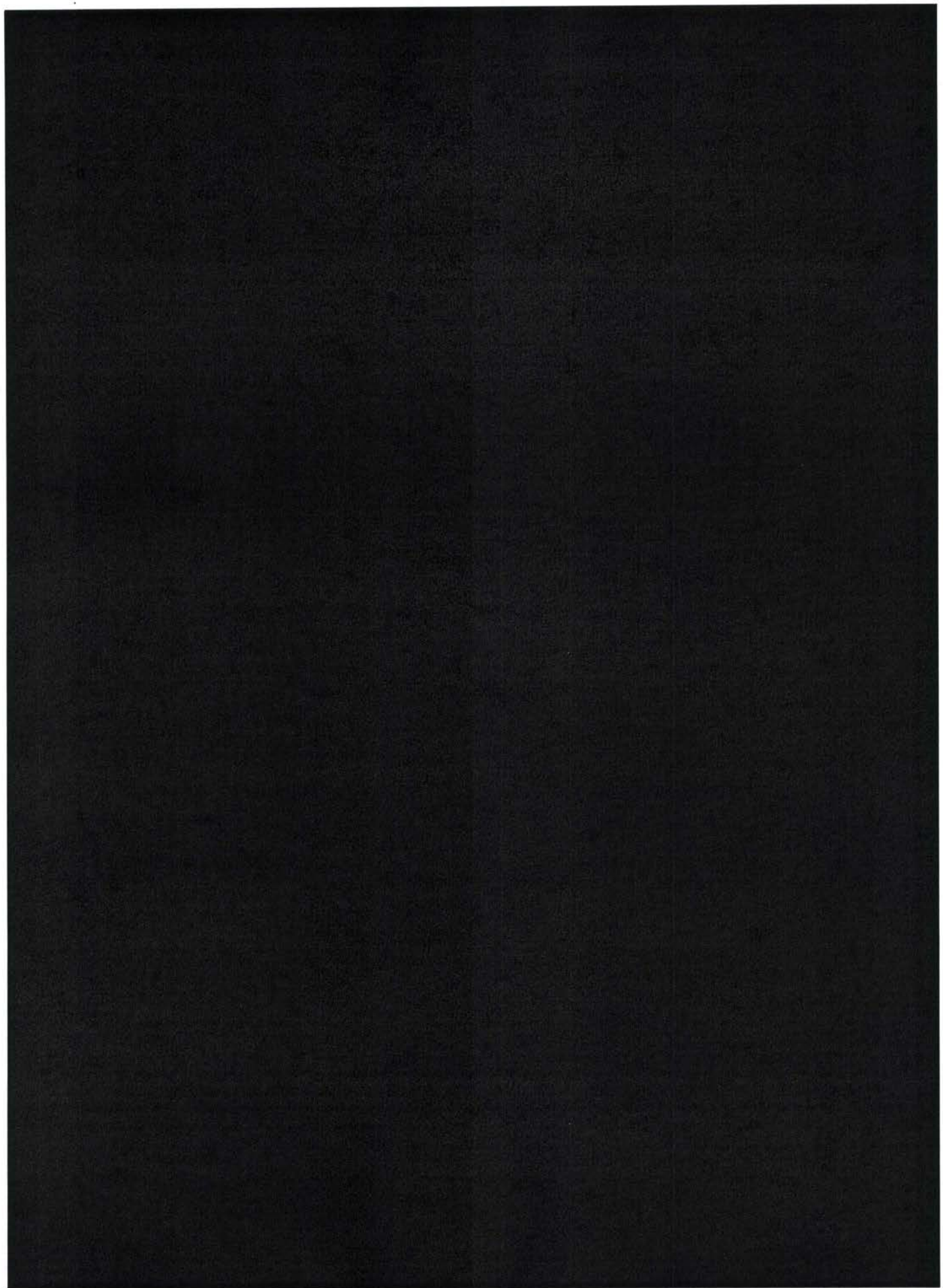
**EXHIBIT B**

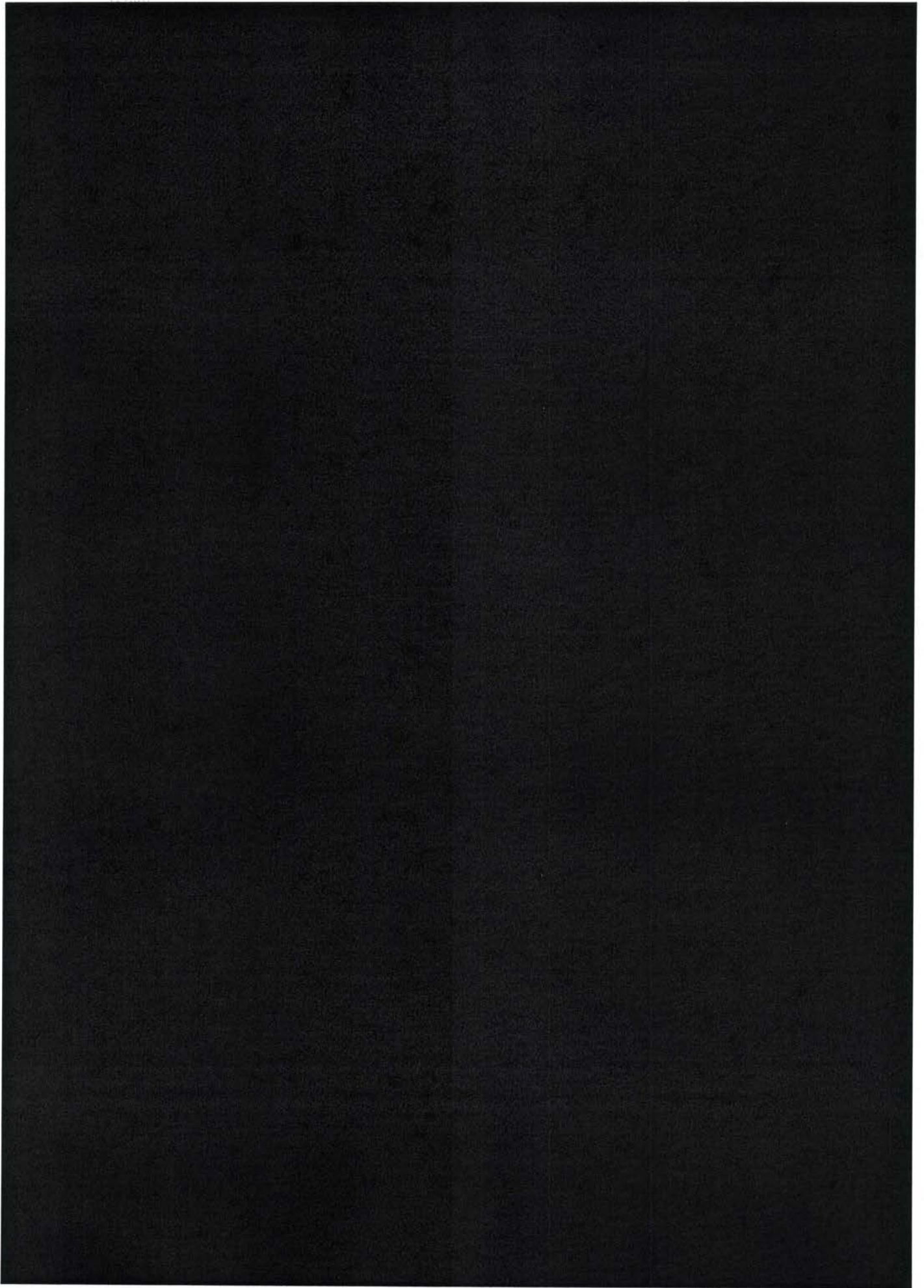


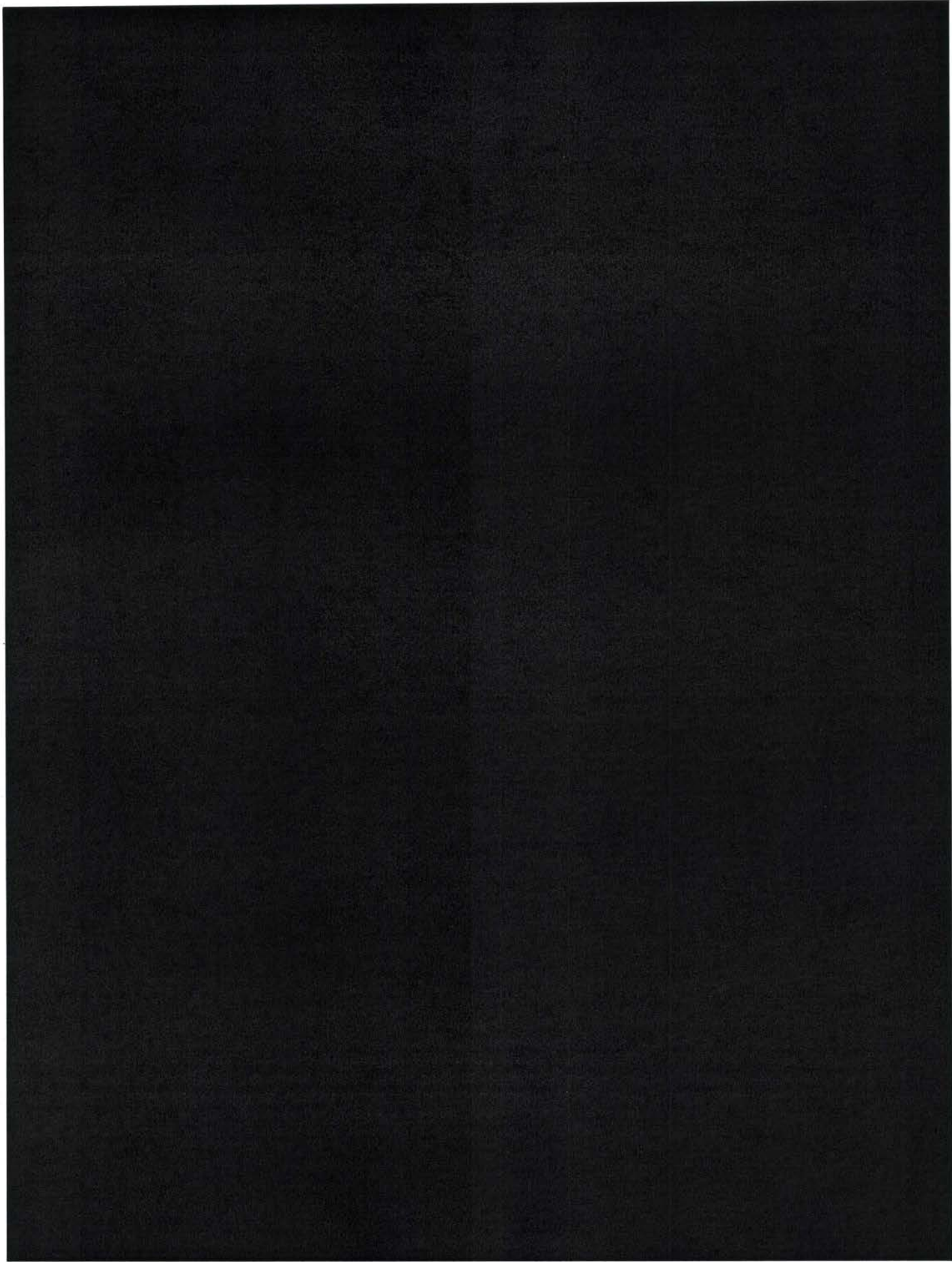
\_\_\_\_ (11) If Applicable: I reside on Federally recognized Tribal Lands.



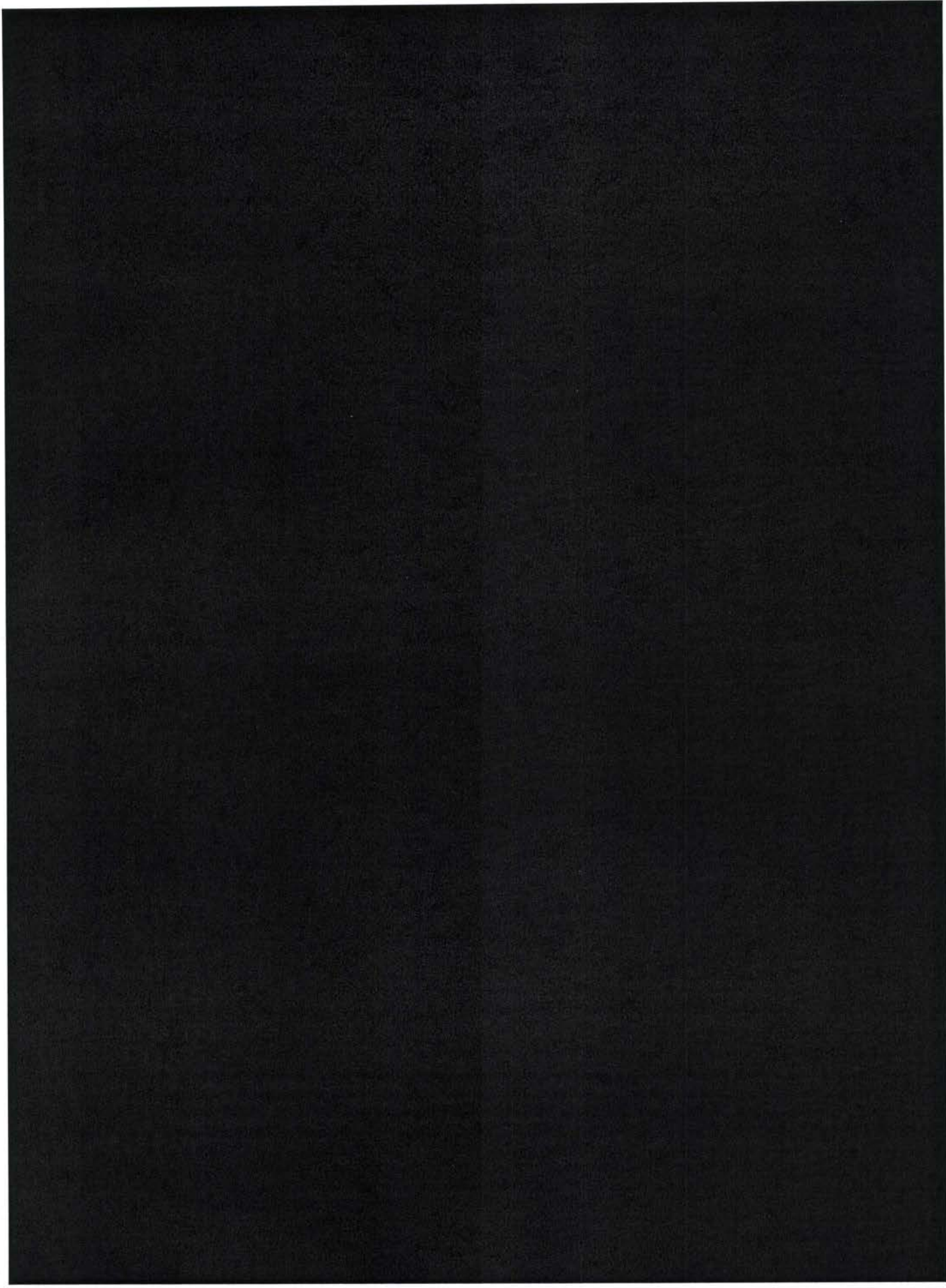


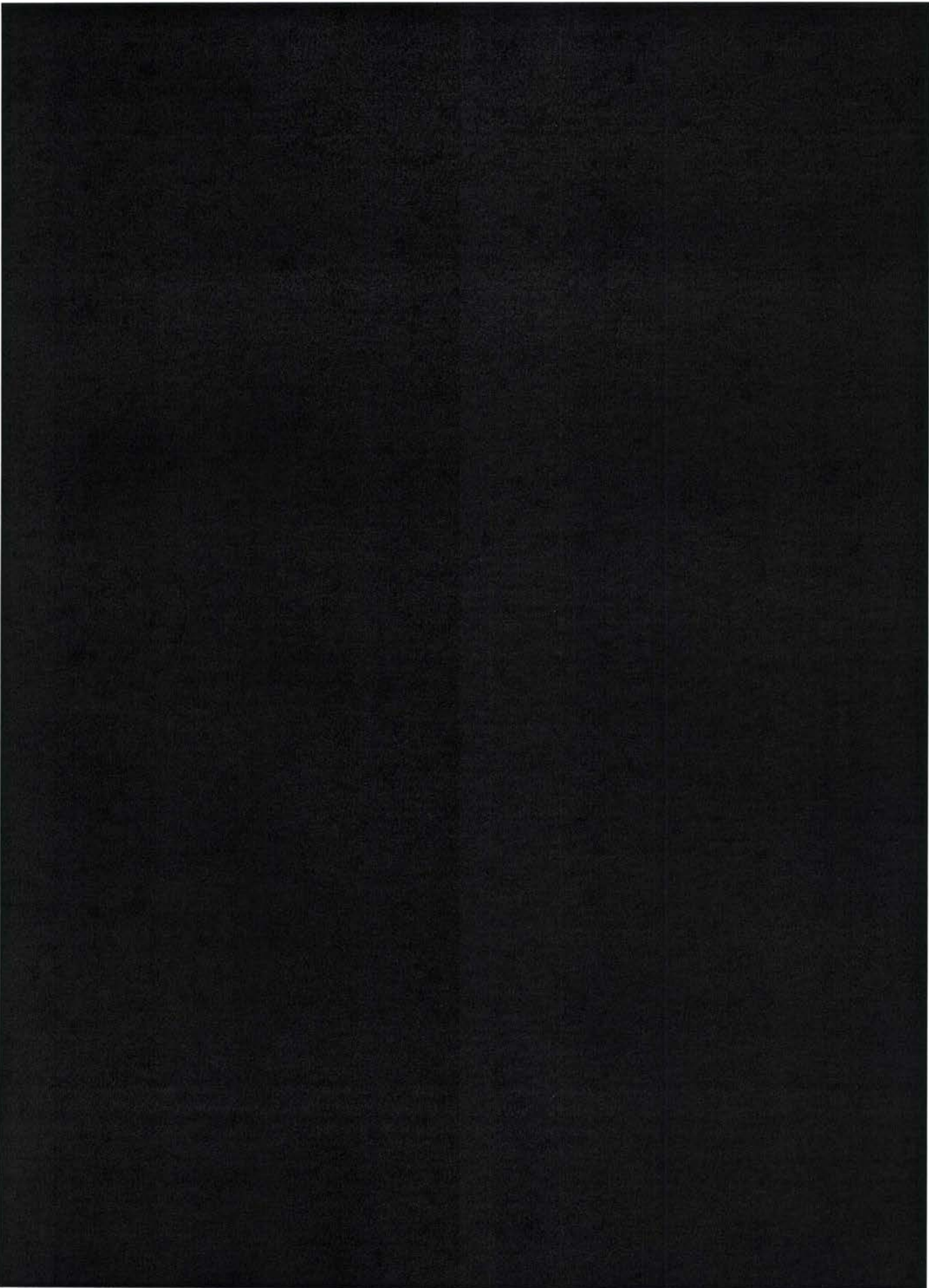


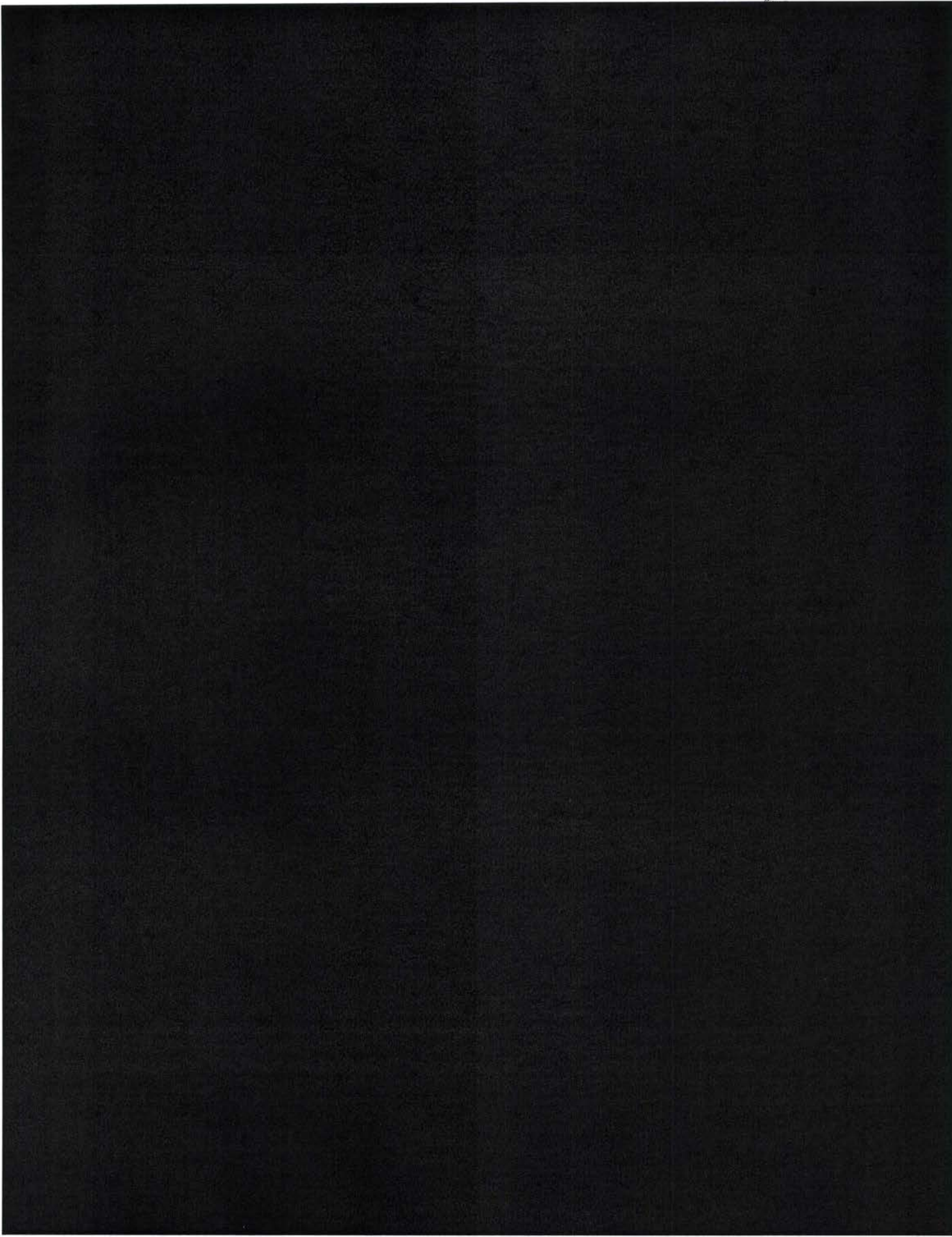


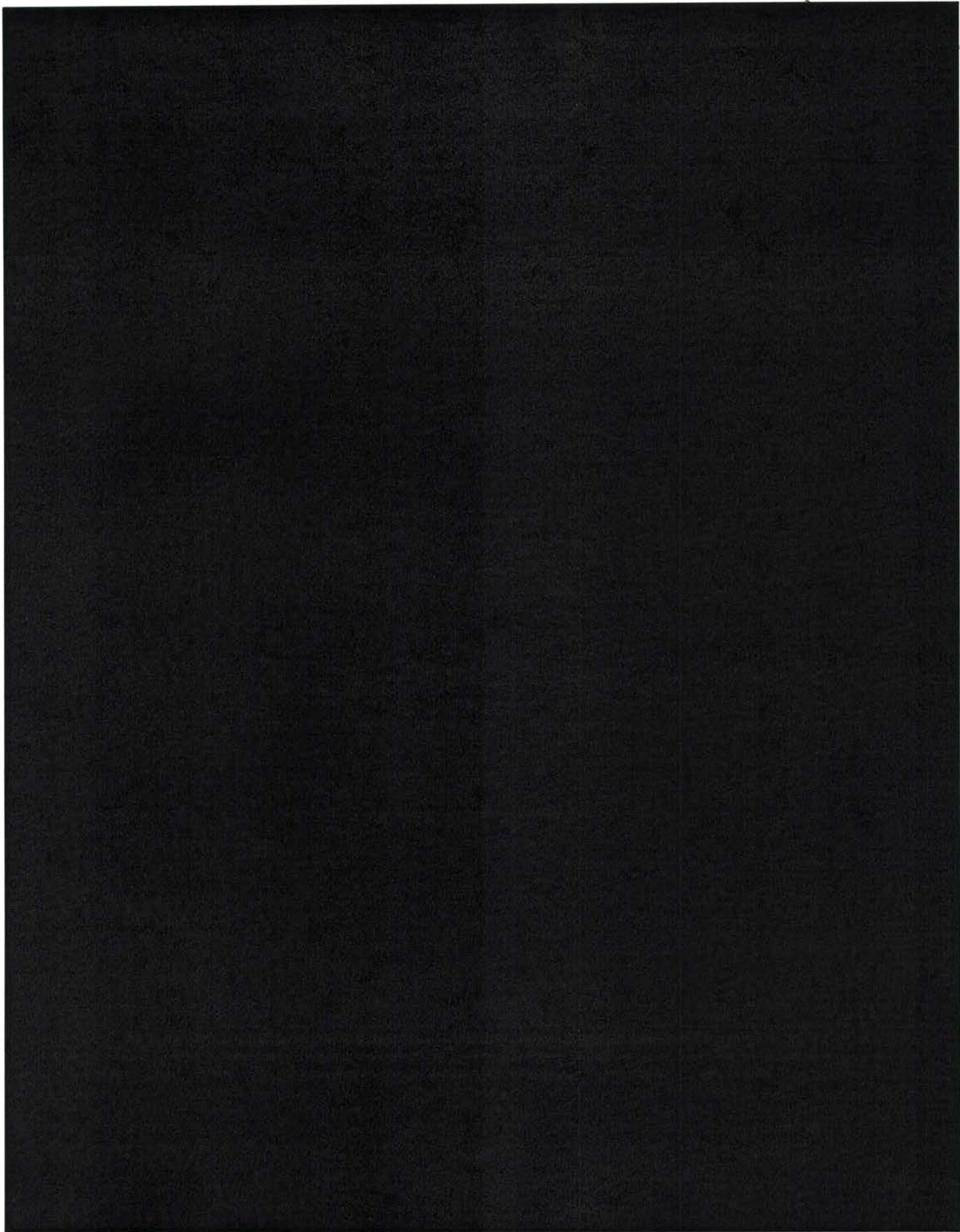


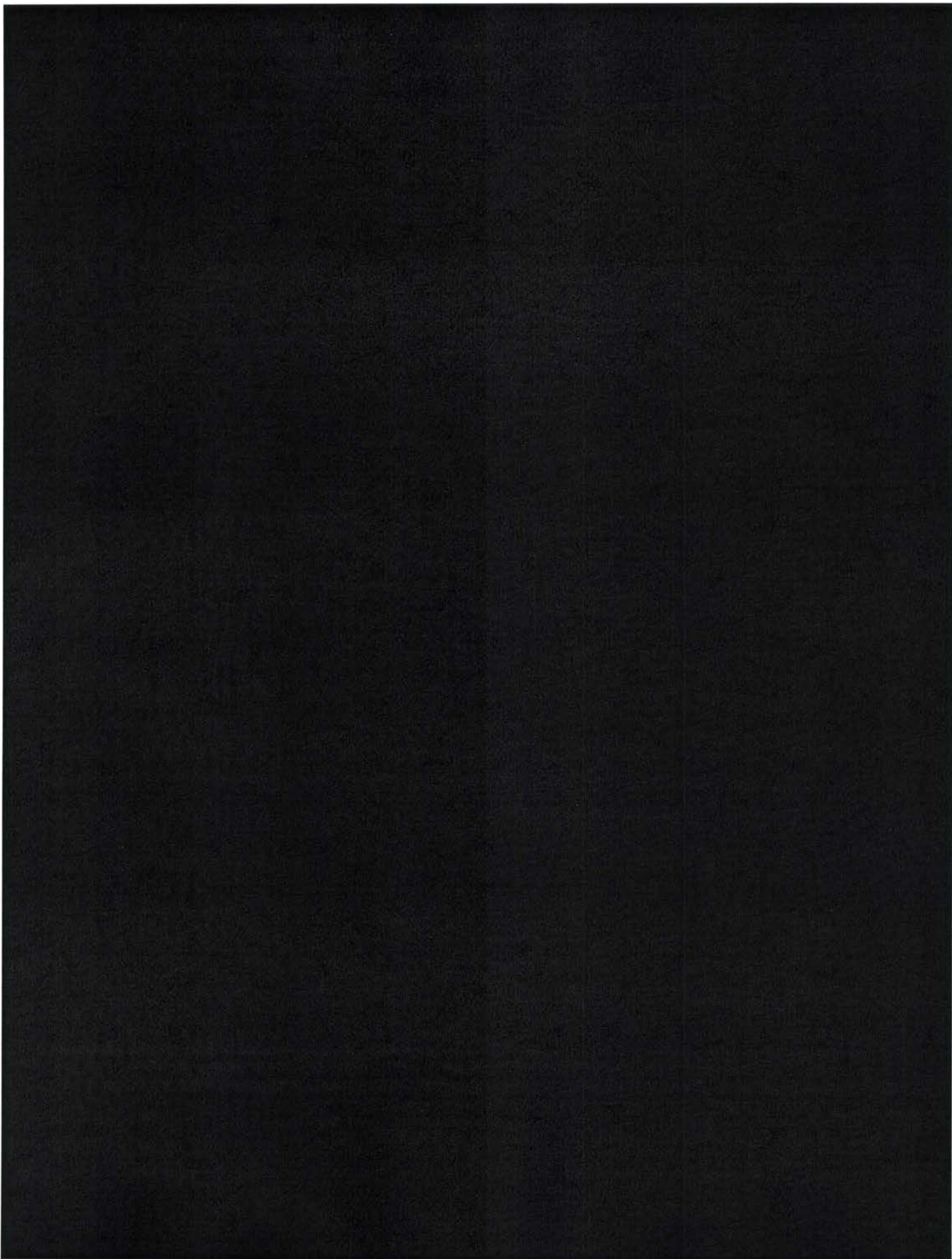






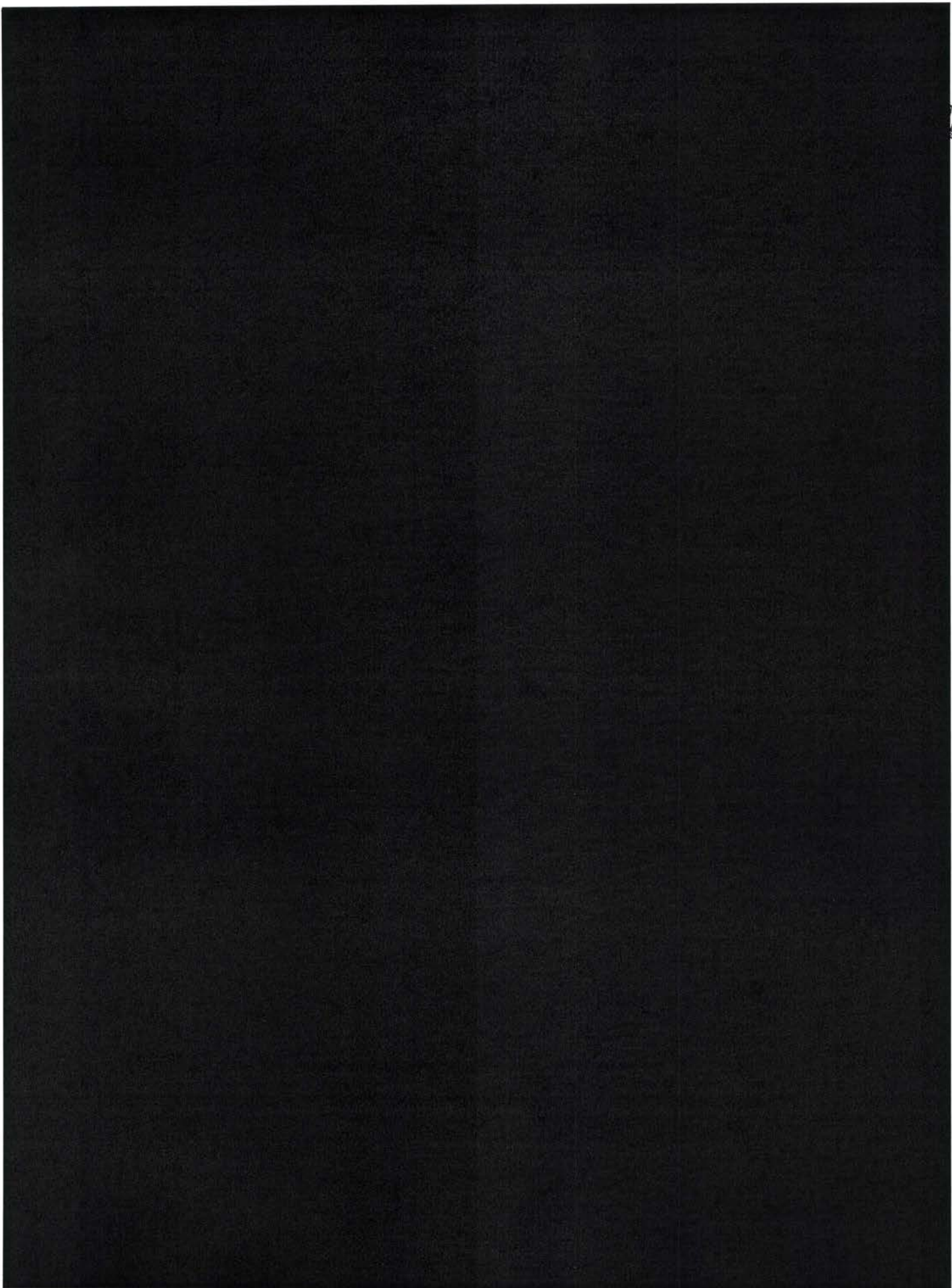


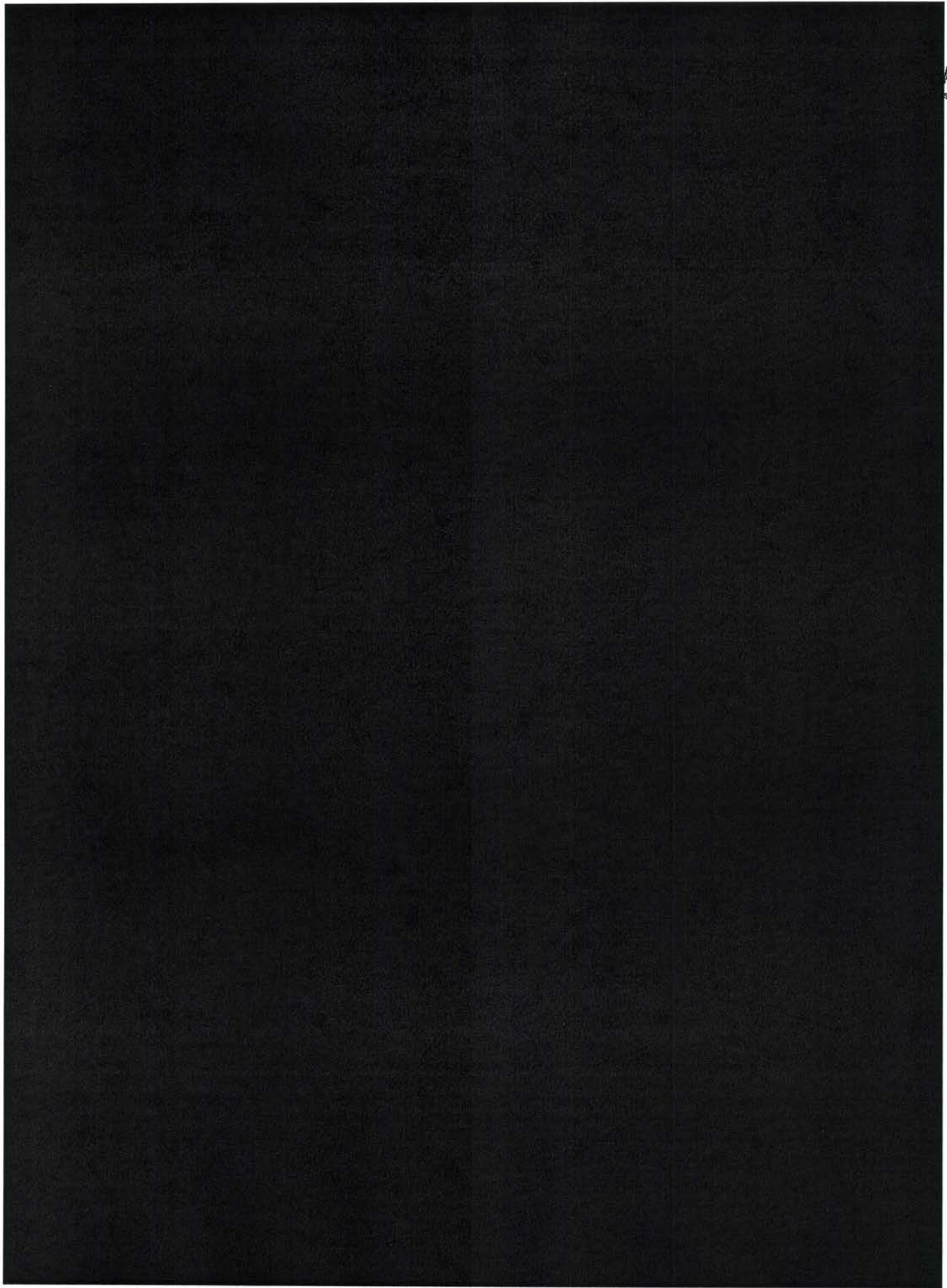




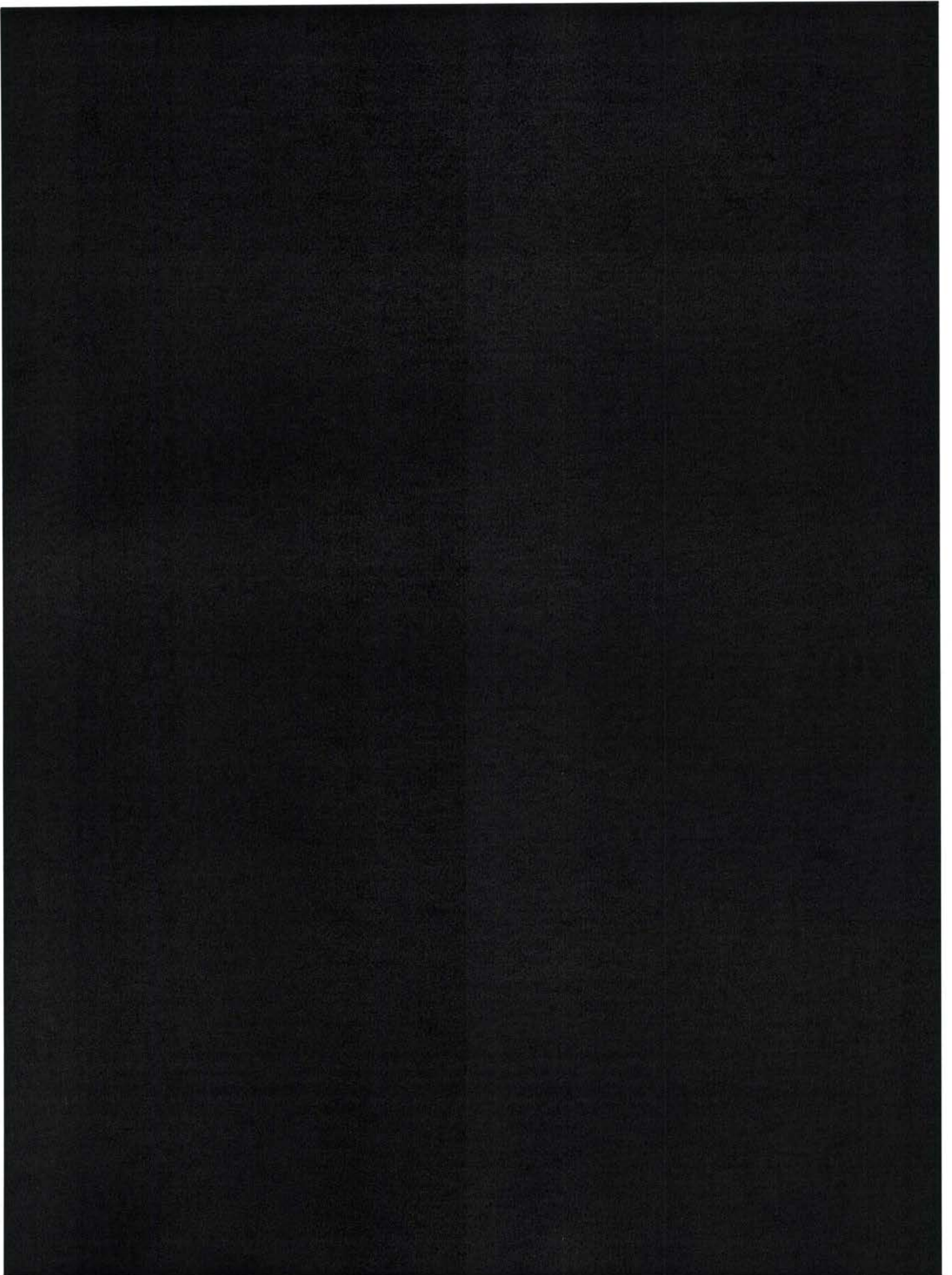


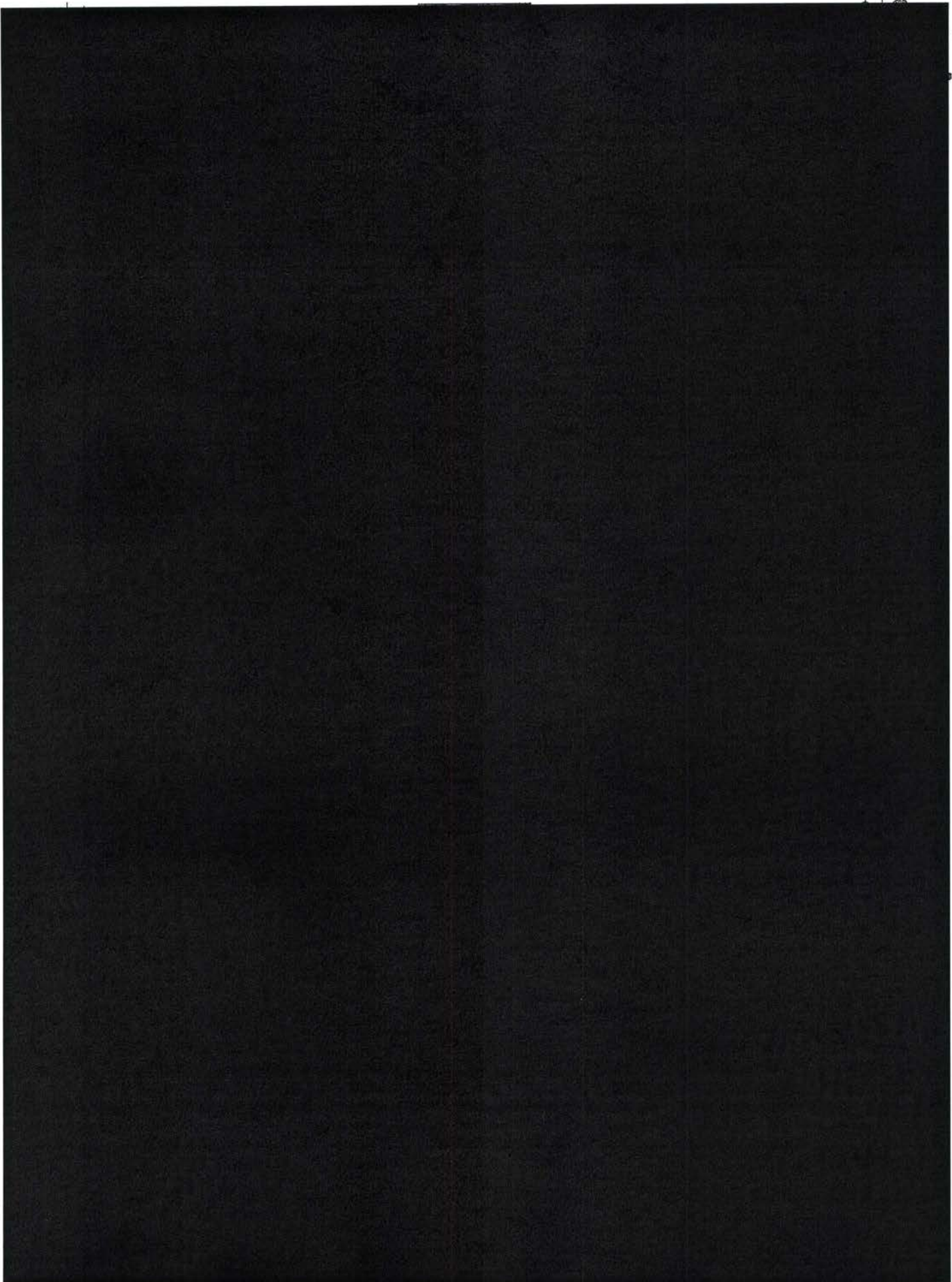
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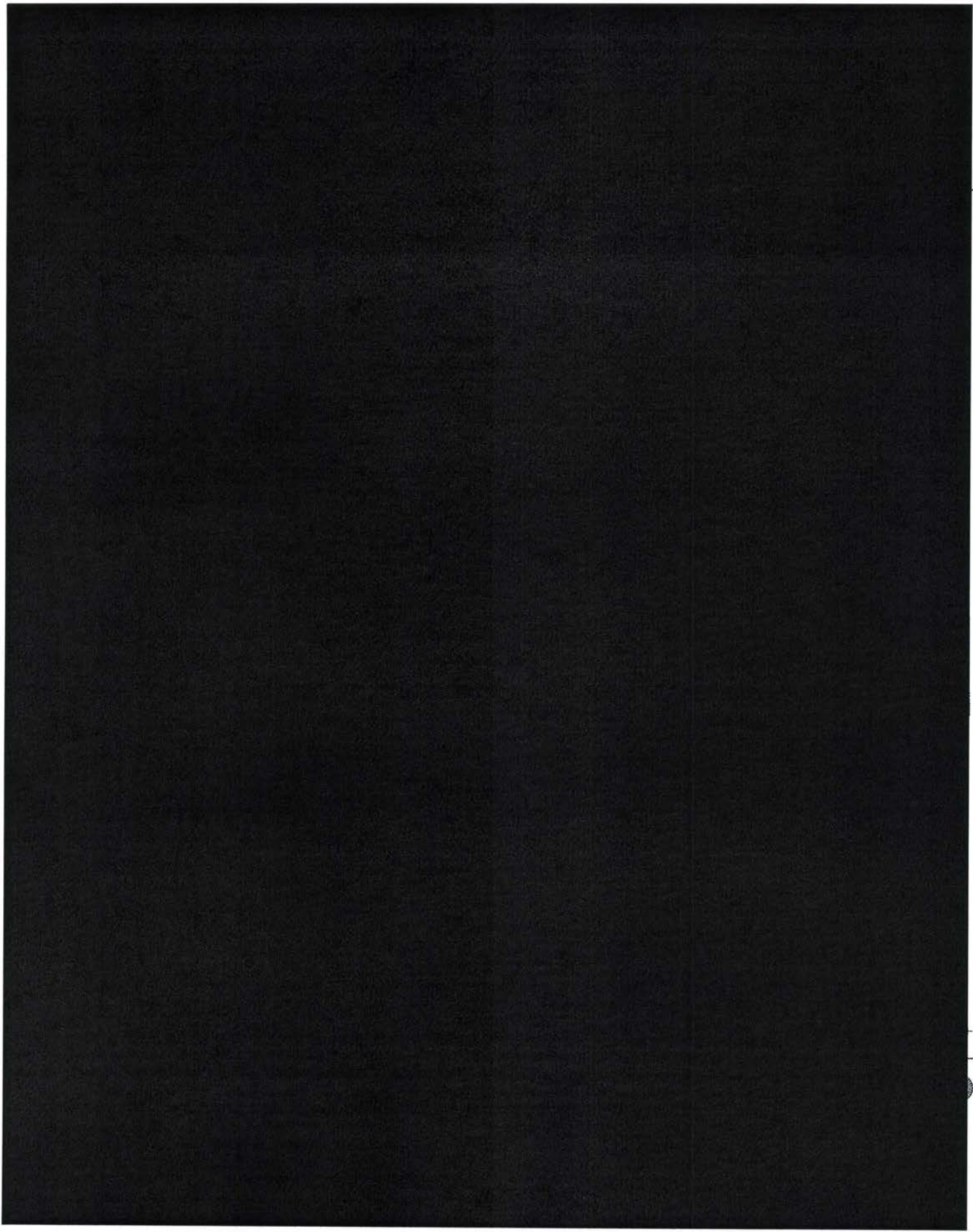




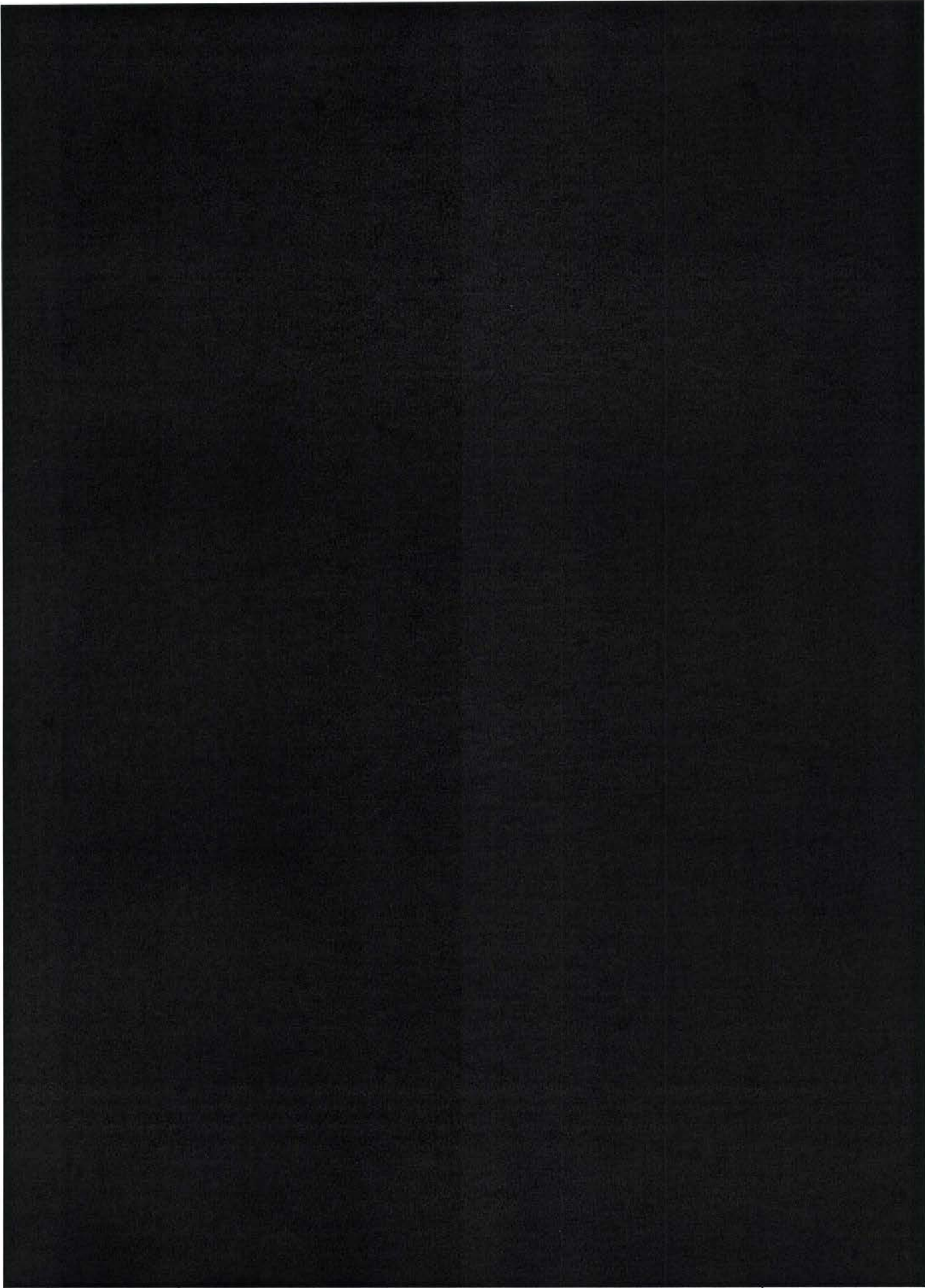






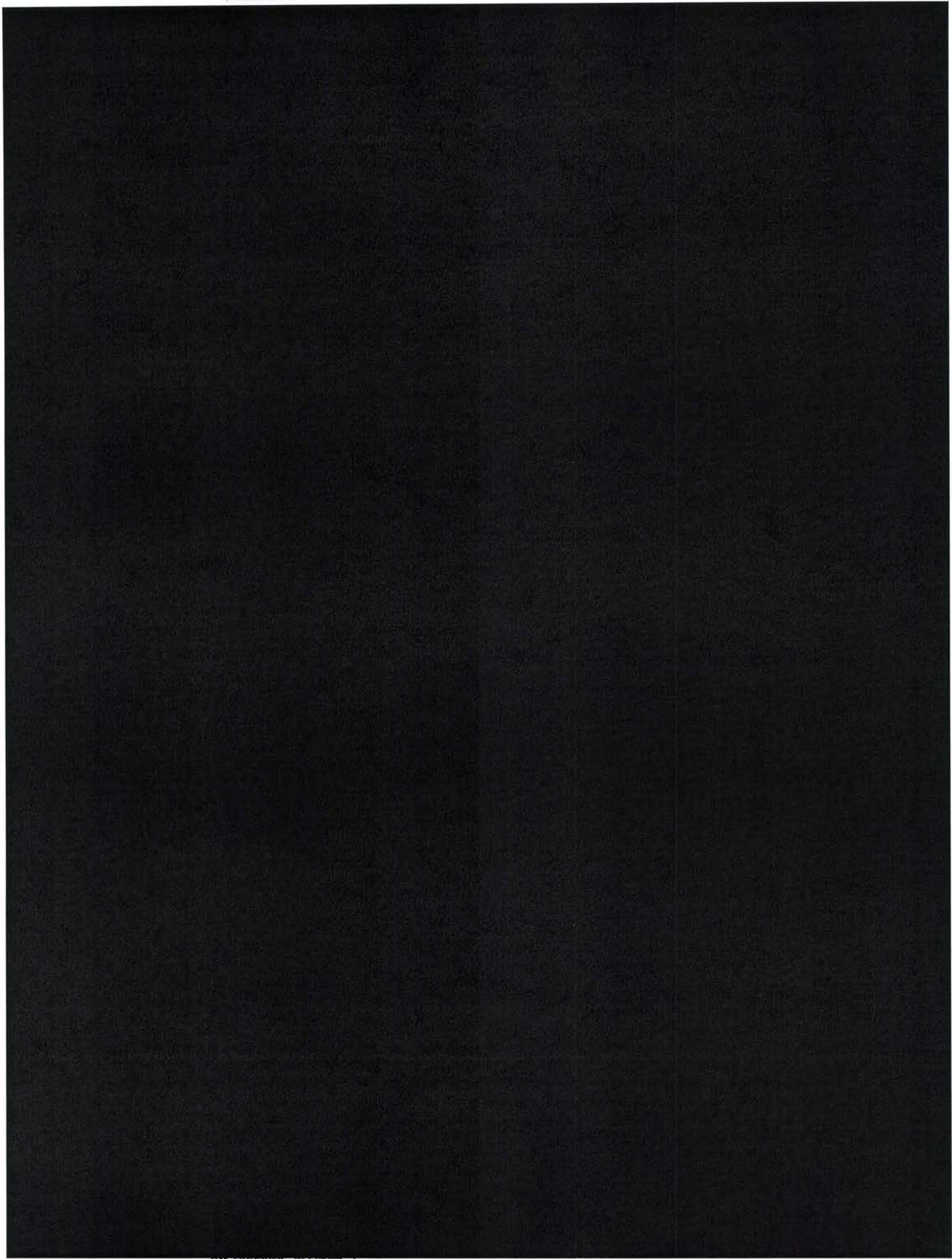


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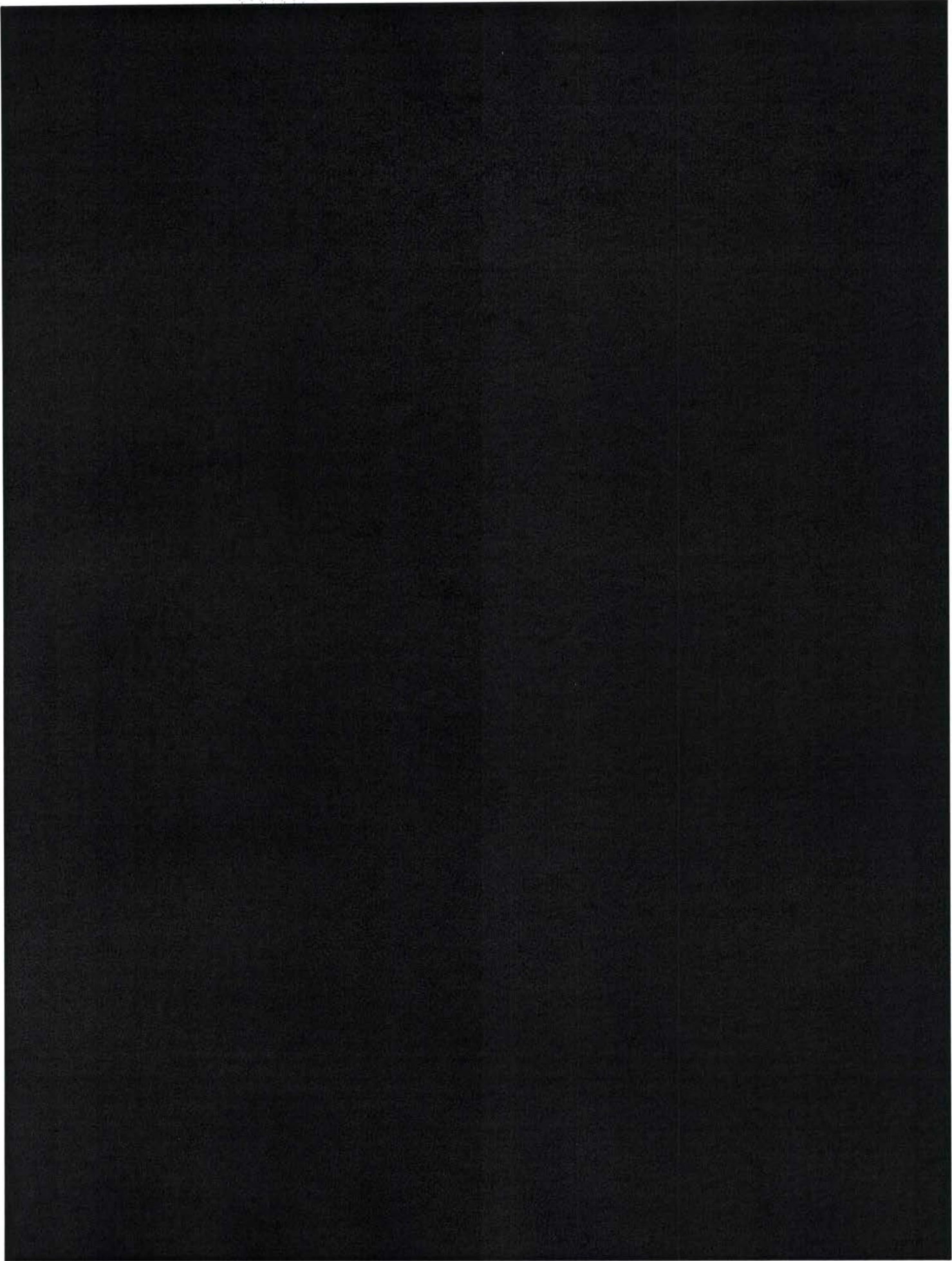


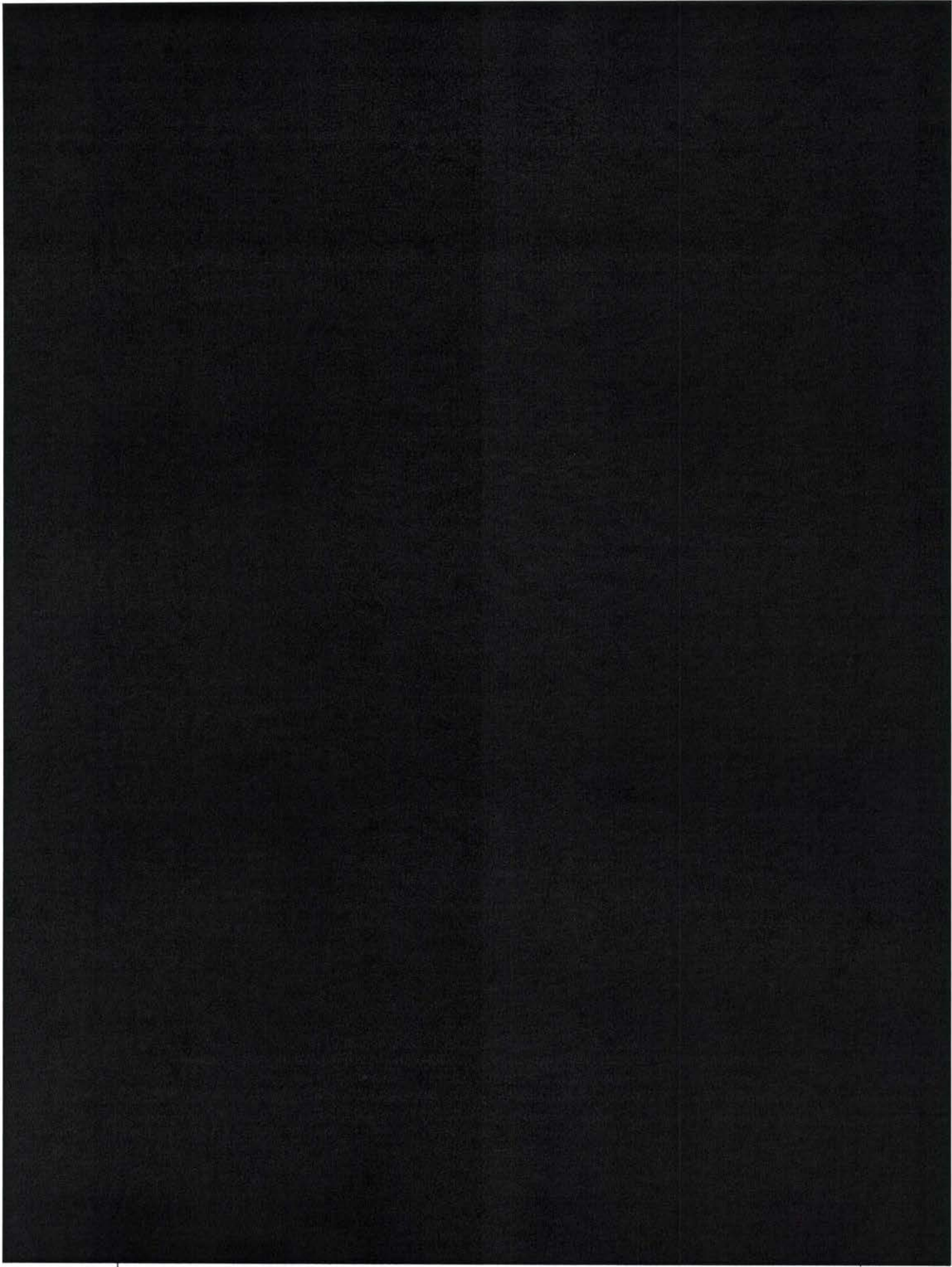


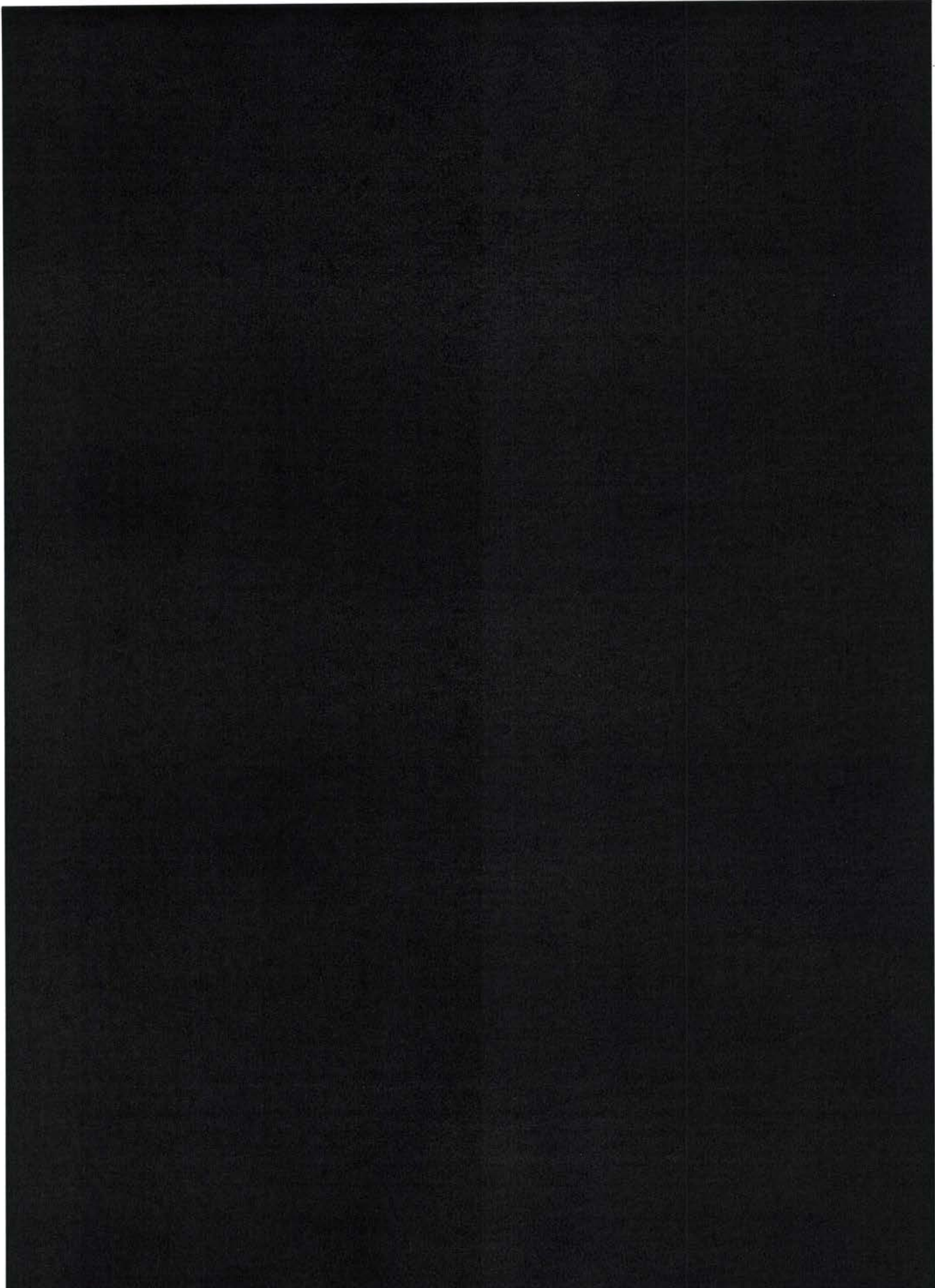


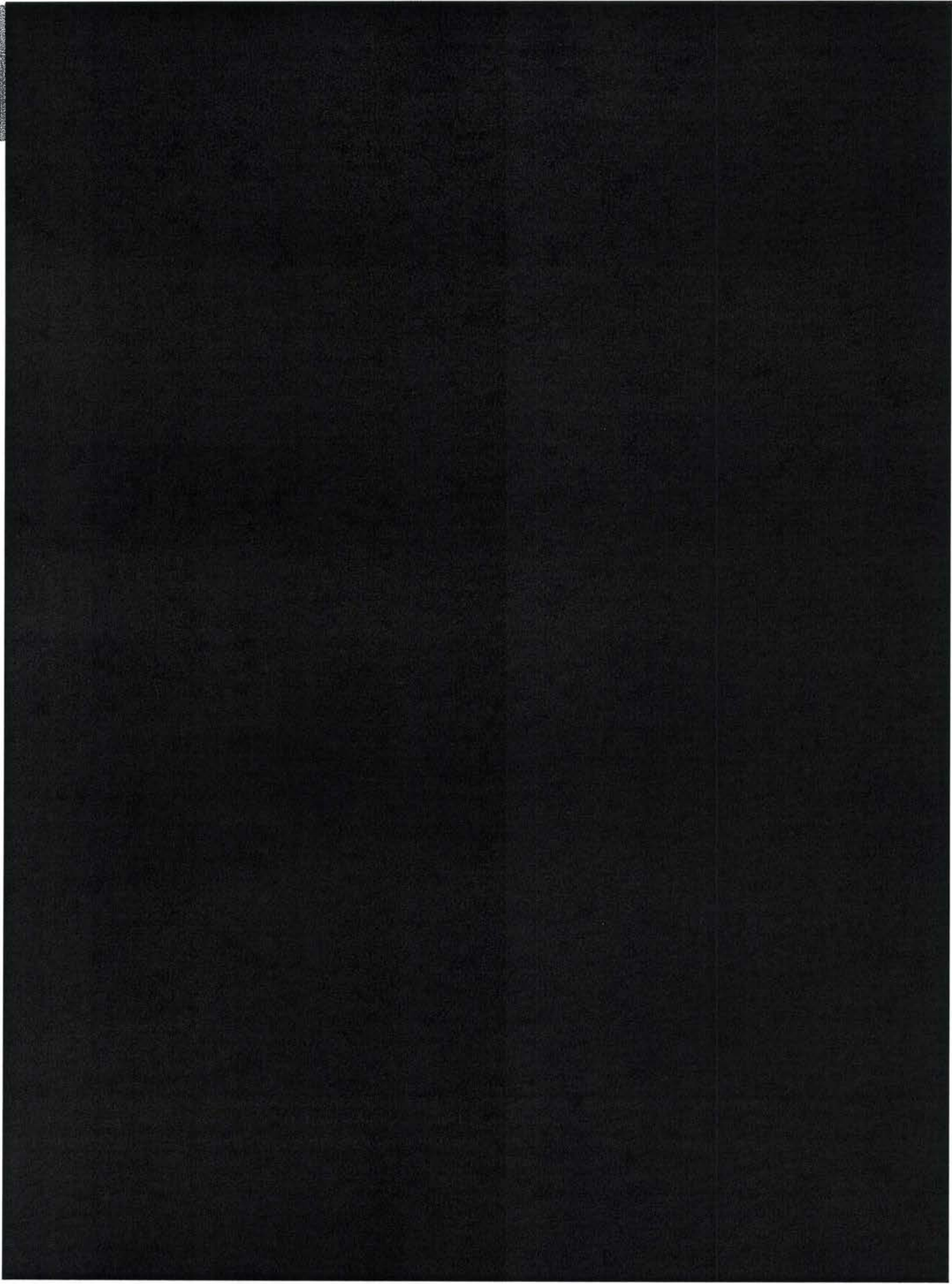












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CLEC and WIRELESS Lifeline Data Request 2014

i-wireless, LLC

EXHIBIT C

