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August 2, 2017

VIA FEDERAL EXPRESS

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

REDACTED

Re: 2017 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 2017 Annual Lifeline Data Request.

i-wireless hereby requests confidential treatment of certain information identified herein (Exhibit A and Response to No. 11) 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.

If you have any questions or need additional information, please do not hesitate to contact me at 678-672-2831 or etc@telecomcounsel.com. Thank you for your attention to this matter.

Sincerely,

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

COM _____ AFD _____ APA _____ ECO _____ ENG _____ GCL _____ IDM ____ TEL ____ CLK ____

LIFELINE DATA REQUEST 2017

To assist the Florida Public Service Commission (FPSC) in the development of our Annual Lifeline Report, staff requests that you provide responses to the following data request by July 31, 2017. This report is prepared for 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. Your response should include your company name, contact person, and email address.

For items 1 through 8, please provide the data for the fiscal year July 1, 2016, through June 30, 2017.

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.

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.

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.

Response: See Confidential Exhibit A

6. The number of customers removed from Lifeline each month. Note: Do not include 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. 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.
 - 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 daily 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 daily from the PSC-online process. Once 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 daily from the Department of Children and Family Services into the CGM Enrollment Compliance Platform (ECP) application. Once 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.

- e. All applications for in-person distribution are reviewed in real time by the Review Team. All applications taken online are reviewed within 24 hours. A customer's Lifeline benefit will automatically be credited to their account upon successful activation and use of the handset.
- Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the method(s) used to verify customer eligibility.

Response:

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.

Starting with anniversary dates on July 1, 2017, service providers must recertify all subscribers according to their anniversary date. The entire process (including deenrollment) must be completed by the customer's anniversary date.

No recertifications for the federal Lifeline benefit were required for anniversary dates that fell from January through June, 2017 (the "transition period").

- 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.
- 11. Description of your company's procedures for Lifeline. If your response has not changed from last year's response, you may indicate this below. Please 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).
 - 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





12. 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 comprehensive training to all of its customer service representatives encompassing the following:

- a. Overview of the Lifeline Assistance Program
- b. Eligibility criteria for participation in the Lifeline Assistance Program by state, including, qualifying public-assistance programs and federal poverty household income requirements
- c. Limit of one Lifeline benefit per household requirement
- d. Annual Certification requirement
- e. Activation and Use requirement
- f. Summary of Lifeline product offering and rate plan options provided by Access Wireless, Customer Care contact information
- g. Step-by-step instructions on the enrollment process using the CGM Electronic Enrollment Compliance Platform application
- h. Acceptable forms of supporting documentation for identification, income verification and qualifying program participation
- i. NLAD validation messages and resolution processes

13. Please provide any link on your website that provides Lifeline information.

Response: www.accesswireless.com

14. Have you experienced any problems implementing the FCC's 2016 Lifeline Modernization Order (FCC 16-38)? If yes, please elaborate.

Response: From a technical standpoint i-wireless has had no issues implementing the modernization order.

15. Does your company offer and seek reimbursement for Basic Internet Access Services in Florida as part of the Lifeline Program? If no, please provide the FCC forbearance order that waives this requirement for your company.

Response: Yes. As permitted by the FCC's new Lifeline Order, i-wireless plans began to offer a Lifeline Broadband service plan effective, December 2, 2016.

16. To the extent you have experienced a decline in Lifeline customers, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting the Lifeline participation in Florida are welcome.

Response: i-wireless has seen a continued decline in Florida subscribers since December of 2016, primarily due to an intentional slowdown in acquisition of new customers. With the implementing of the FCC's 2016 Lifeline Modernization Order (FCC 16-38), it is becoming increasingly difficult to profitably acquire Lifeline subscribers in a \$9.25 (subsidy) state.

EXHIBIT A

CONFIDENTIAL AND PROPRIETARY



Number of customers denied Lifeline service, by category

		NLAD Failures, Invalid Address, Name/DOB Mismatch
7	2016	
8	2016	
9	2016	
10	2016	
11	2016	
12	2016	· 新教 [1] · · · · · · · · · · · · · · · · · · ·
1	2017	
2	2017	No. 1 States
3	2017	
4	2017	
5	2017	
6	2017	

EXHIBIT B

Free Smartphone + 500 MB Data Unlimited Text 350 Minutes

* 3G high-speed data

Stay connected when you have Access.

OCCESS WIRELESS. A government-funded Lifeline Assistance Program.

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GOVERNMENT ID NUMBER Last 4 digits of Social Security Number or Tribal ID Number



QUESTIONS? Call 888-900-2608 www.accesswireless.com

Free phone is provided by Access Wrieless. Access Wreitess is a service purveder for the gavernment-handed Lifeline Association Peopsani Lifeline services provider bip / wrieless LLG dulta Access Wrieless, or assachand internet access service may be received per household. A household is defined, for the purpose of the Lifeline program, as any individual or group of individuals who live at the same address and base income and expenses. A household is not permitted to receive benefits from molitopic provides. Yealbalan of the CCS rules and will result in de-entoiment from the Lifeline program. Consumers with writelius make fasis statements in order to obtain a Lifeline benefit and be purshed by the information the Lifeline program. Consumers with writelius make fasis statements in order to obtain a Lifeline benefit and be purshed by the information terms. How we have the statement and the statement of the service with Access Wrieless on the statemation and access and access that seen the service barred from the program. Customers must prevent proper documentation confirming their eightility for the Lifeline program. Customers that seets a brandband service plan must maintain their service with Access Wrieless for Lifeline service and household and be anter the service plan documentation confirming their eightility for the Lifeline program. Customers that seets a brandband service plan must maintain their service with Access Wrieless for Lifeline the service with Access Wrieless for the set a wave service plan must maintain their service with Access Wreiess for 60 days.

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You will need:



YOU **WILL NOT QUALIFY** FOR A FREE PHONE WITHOUT THE FOLLOWING DOCUMENTS:

You may only have ONE Lifeline benefit, consisting of either landline or wireless service.





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Assistance



Driver's License Passport Tribal ID Additional forms of proof of identification may be accepted

PROOF OF ADDRESS

Driver's License or Government-Issued ID Utility Bill or Mortgage Statement Statement of Benefits or Pay Stub Additional forms of proof of address may be accepted.

PROGRAM ELIGIBILITY DOCUMENT

Medicaid Card SNAP Card Public Housing Voucher SSI Card 3 months of income verification Additional forms of qualifying documentation may be accepted.



GOVERNMENT ID NUMBER

Last 4 digits of Social Security Number or Tribal ID Number As required by state specifications.



A government-funded Lifeline Assistance Program

QUESTIONS? Call 888-900-2608 www.accesswireless.com

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Access to jobs.



You may qualify for Lifeline Assistance by Access Wireless® if you participate in public assistance programs such as SNAP/Food Stamps, Medicaid or SSI.

Call 1-888-450-1838

www.accesswireless.com



Gratis +500 MB de Datos* Textos Ilimitados 350 Minutos

Teléfono

Access a trabajos.

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Usted puede calificar para la Asistencia Lifeline que proporciona Access Wireless[®] si usted participa en programas de asistencia pública como SNAP/Cupones de Alimentos, Medicaid o el Seguro de Ingreso Suplemetario.

Llamada 1-888-450-1838

www.accesswireless.com

A government-funded Lifeline Assistance Program



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Para aplicar, visite www.accesswireless.com

* Datos de alta velocidad 3G



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500 Minutos **Textos Ilimitados** 500 MB de Datos por 30 días

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Minutos Ilimitados Textos Ilimitados 4 GB de Datos

250 Minutos Texto Ilimitados 250 MB de Datos

\$5

PIN Electronico solo en tiendas selectas



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Usted puede recibir Premios Wireless GRATIS al momento de pagar cuando compre en tiendas participantes de la cadena Kroger y use su tarjeta de compras o "Rewards Card". Por cada 100 puntos que acumule, usted recibirá un Premio Wireless GRATIS."



Llame al 611 desde su teléfono de Access Wireless para registrarse.

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You may qualify for Lifeline Assistance provided by Access Wireless' if you participate in public assistance programs such as SNAP/Food Stamps, Medicaid or Supplemental Security Income.

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To apply, visit www.accesswireless.com

* 3G high-speed data.



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