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August 10, 2017

**VIA FEDERAL EXPRESS**

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

**REDACTED**

RECEIVED-FPSC  
2017 AUG 11 PM 2:41  
COMMISSION  
CLERK

Re: 2017 Annual Lifeline Data Request (Global Connection Inc. of America)  
**CONFIDENTIAL TREATMENT REQUESTED**

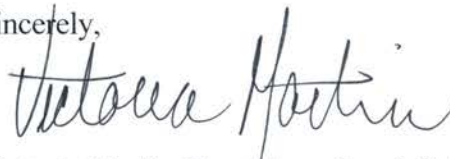
To Whom It May Concern:

Global Connection Inc. of America (herein "Global") hereby files an original and two (2) redacted copies of its responses to the 2017 Annual Lifeline Data Request.

**Global hereby requests confidential treatment of certain information identified herein (Exhibits A) pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. A confidential copy of the responses is attached hereto in a separate, sealed envelope.**

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 Global Connection Inc. of America

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
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- IDM** 2
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## 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, plus a \$3.50 Company provided credit.**
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. All denials were due to Customer unable to demonstrate Program Eligibility.**
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.
  - 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. **The State of Florida's Office of Public Counsel Lifeline application specifically states "If you are NOT a customer of AT&T, CenturyLink, T-Mobile or Verizon, please contact your telephone company to apply for Lifeline". As we are not a specified designated Company, all applications are received either directly from customers, through the PSC portal, or through the DCF direct enrollment process.**
  
- b. **The Company maintains the following procedures for self-certification applications received, regardless as to the means by which applications are received. Upon receipt of a potential subscriber's application, trained Agents handle and process each application individually to ensure compliance, efficiency and reliability. Trained Agents review subscriber applications to ensure compliance with each of the following regulatory & Company policy base objectives:**
  - 1) **The application captures all required subscriber information**
  - 2) **The applicant acknowledges understanding of all of the required disclosures.**
  - 3) **The applicant understands and completes all of the required certifications.**
  - 4) **The consumer's identity is verified through review of acceptable government identification.**

**Upon successful navigation of these objectives, the consumer's eligibility is confirmed and verified through the review of acceptable documentation and upon established access through querying of the available databases. If such eligibility is confirmed and verified, the applicant's self-certification form is retained, and processed, effectuating the connection and initiation of phone**

service under the Lifeline program. Each application is, retained in electronic form and / or hard copy, proof information is captured, and any proof documentation is destroyed or returned to each applicant. Finally, the Company maintains these records of specific data relied upon to confirm the applicant's initial eligibility for Lifeline.

- c. Upon receipt of notification of applications through the PSC system, the Company proceeds to access the PSC portal to retrieve the potential subscriber applications and download the respective applications for processing. The applications provide for the necessary customer information and the Company proceeds to contact each applicant in order to ultimately effectuate Lifeline service. Once contacted, each customer is instructed on the Company's application process and on how to most efficiently prepare, submit and prove eligibility in order to commence Lifeline service. Each customer application is processed in the manner as described above under subparagraph (b) to include but not be limited to, confirming eligibility through the review of documentation. The Company is in the final process steps of setting up access into the DCF automatic enrollment process database and upon establishing access, eligibility will be confirmed through such database for applications received through the PSC portal.
  - d. Customers that inquire about or apply for Lifeline Assistance through the Florida Department of Children and Families are routed to the PSC online process via a link on the official website (MyFLFamilies.com). At this point applicants would then follow the same procedures listed in description (c).
  - e. Applications received for wire-line subscribers are typically and ordinarily processed with wire-line services becoming active and initiated within one to five business days after application completeness and eligibility verification. Wireline services become active upon complete processing and the customer immediately receives the Lifeline credit upon initiation of service.
10. 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: Global requires Lifeline end users to recertify continued eligibility annually in accordance with FCC regulations. Global reviews Lifeline consumer proof of program participation or income eligibility as well as applications received from the state of Florida from consumers requesting service through the state's online lifeline enrollment portal.**
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: No change from last year's response, with the exception of updated Lifeline rule changes.**

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: The Company provides training to all of its customer service representatives and field agents regarding promoting, soliciting, and enrolling subscribers in the Lifeline program. The objectives of the training program offered by the Company include the following:**

**To assist Lifeline Applicants in determining eligibility**

**To answer questions about Lifeline eligibility**

**To review documentation and determine if it satisfies Lifeline Eligibility.**

**To be able to verbally explain the certifications to the consumers when enrolling**

**To be able to answer questions about the required disclosures.**

**To be able to explain the "One Lifeline Phone per Household" requirement.**

**A summary script as is used by our Customer service representatives is attached.**

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

**Response:**

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

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

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

**Response: No.**

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: No. GCIOA filed for forbearance under WC Docket No. 11-42.**

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: Customer declines due to competitive pricing continue to occur due to the fact that GCIOA is a reseller of ATT's network. As price increases continue to occur, these costs are partially passed along to the end-user, which ultimately results in customer loss.**

Lifeline Data Request 2017  
July 18, 2017

**EXHIBIT A**

**CONFIDENTIAL AND PROPRIETARY**

Global Connection Inc. of America

	2016						2017					
	7	8	9	10	11	12	1	2	3	4	5	6
1 Total residential access lines in service												
2 Total End of Period Lifeline customers												
4 Customers denied Lifeline service in month												
5 New Lifeline customers enrolled in month												
6 Lifeline customers de-enrolled in month												
7 Transitional Lifeline Participants												
8 Tribal Lifeline customers												
15 Resale Lifeline lines:												
AT&T												
Century												
Verizon												
Windstream												

Number of customers denied Lifeline service, by category

		Customer Unable to demonstrate Program Eligibility	Documents Not Acceptable	Documents Not Received	Lifeline Certification Form Not Complete	Lifeline Certification Form Not Received
7	2016					
8	2016					
9	2016					
10	2016					
11	2016					
12	2016					
1	2017					
2	2017					
3	2017					
4	2017					
5	2017					
6	2017					



# Welcome to Global Connection

Per your request we are mailing you our Lifeline Certification Form!

Please submit a copy of your eligibility documents and a valid government issued ID with a copy of your completed application.



## STEP 1: SIGN YOUR APPLICATION

### PROPERLY COMPLETE AND SIGN YOUR APPLICATION!

Sign your name on the signature line near the bottom of the form.

## STEP 2: REVIEW YOUR APPLICATION

- ❓ Is your Lifeline form enclosed?
- ❓ Is your name and address correct?
- ❓ Is the correct public assistance program which you currently participate in selected?

## STEP 3: SUBMIT YOUR APPLICATION

- 📧 Text a picture of your form to: 678-252-9983
- ✉ OR Email your form to: Lifeline@GCI0A.com
- ✉ OR Fax your form to: 1-888-878-9323
- ✉ OR Mail your signed form to:  
Global Connection Inc.  
P.O. Box 1187 Norcross, GA 30091

### PAYMENT OPTIONS



Pay with your Visa or Mastercard credit or debit card  
Online: [www.RealHomePhone.com](http://www.RealHomePhone.com) • Call: 1-877-511-3009



**SAVE \$2**

When you ENROLL IN AUTOPAY with your Visa or Mastercard credit / debit card



Pay at any MoneyGram location using receive code: 3869



Pay at any Western Union location including Kroger and BI-LO



Pay at any ACE Cash Express location.

**CHECK / MONEY ORDER:** Include account number, driver's license and date of birth. Make payable to: Global Connection Inc. MAIL TO: P.O. Box 1527 Norcross, GA 30091

**UNLIMITED LONG DISTANCE MINUTES**

**ONLY \$10**  
Per Month

**REFER A FRIEND TO GLOBAL NOW!**

**WE WILL GIVE YOU \$10.00 OFF YOUR BILL**

Call Global Connection Customer Service for details

**CUSTOMER SERVICE CONTACT INFO**

**EMAIL ADDRESS**

Email us at: [Lifeline@GCI0A.com](mailto:Lifeline@GCI0A.com)  
Your issue will be resolved promptly and courteously.

**PHONE NUMBER**

**1-877-511-3009**  
Customer Service Hours  
M-F 8:30 am to 6:00 pm EST

### IMPORTANT

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

### LIFELINE ELIGIBILITY CRITERIA

Please check your eligibility on the list below:

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

Income level of 135% of Federal Poverty Guidelines or Below; (Except MI and CA)

Income level of 150% of Federal Poverty Guidelines or Below; (Limited to MI and CA only)

State has specific qualifying Programs (Call to confirm); CA, MI  
Temporary Assistance for Needy Families (TANF)(CA and MI only; Low Income Heat and Energy Assistance (LIHEAP)(CA and MI only); National School Free Lunch Program (NSLI)(CA and MI only)

### LIFELINE WIRELINE SERVICE INFORMATION:

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

Colorado Public Utilities Commission Consumer Affairs at 303-894-2076 or 800-458-0958	Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 800-282-5813	Kansas Commission's Office of Public Affairs and Consumer Protection at 785-271-3140 or 800-662-0027 TDD 800-766-3777	Massachusetts Consumer Division Dept. of Telecommunications & Cable 617-305-3531 or 800-392-8066
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Global Connection Inc. of America d/b/a: Real Home Phone Service

SEE  
STORE AGENT  
TO  
SIGN UP NOW!

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

If you receive Government supported services,  
you may be eligible for a **Lifeline Discount** on your home telephone service.

We proudly accept Global Connection  
Real Home Phone Service payments

**1-877-511-3009**  
hablamos español

- ✔ **Unlimited Local Calls**
- ✔ **Great Plans**
- ✔ **No Credit Check**
- ✔ **No Contract**
- ✔ **No Deposit**



\*Restrictions apply. See representative for details.



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

Colorado Public Utilities  
Commission Consumer  
Affairs at 303-894-2070  
or 800-455-0254

Georgia Public Service  
Commission's Consumer  
Affairs Unit at 404-656-4501  
or 1-800-282-5813

Kalifornia Commission's Office of  
Public Affairs and Consumer  
Protection at 785-271-3140 or  
800-662-0027  
TDD 800-798-3777

Massachusetts Consumer Division  
Dept. of Telecommunications & Cable  
617-305-3531 or 800-392-6065

**IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:**

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

**LIFELINE ELIGIBILITY CRITERIA** Please check your eligibility on the list below

You may qualify if you participate in any of the following programs:

- Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Medicaid
- Federal Veterans' and Survivor Pension Benefit

You may qualify if your:

- Income is at or below 135% of Federal Poverty Guidelines (except for MI and CA)
- OR Income at or below 150% of Federal Poverty Guidelines (CA and MI only)

You may qualify if you participate in the following programs:

- Temporary Assistance for Needy Families (TANF)(MI and CA only)
- Low Income Heat and Energy Assistance (LIHEAP)(MI and CA only)
- National Free School Lunch Program (CA and MI only)

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PHONE  
SERVICE**  
www.RealHomePhone.com

Service provided by Global Connection Inc. of America

REP Agent 2008-8-5X11 REV. 01/17