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August 27, 2019

VIA FEDERAL EXPRESS

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

REDACTED

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2019 AUG 28 AM 9:51
COMMISSION CLERK

Re: 2019 Annual Lifeline Report 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 2019 Annual Lifeline Data Request.

Global hereby requests confidential treatment of certain information identified in Exhibits A and B 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.

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

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CLEC AND WIRELESS LIFELINE DATA REQUEST 2019

To assist the Florida Public Service Commission 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, 2019. Your response should include your company name, contact person, and email address.**

RESPONSES OF GLOBAL CONNECTION INC. OF AMERICA
Contact: Jennifer Carter, Chief Compliance Officer
Email: compliance@standupwireless.com

For items 1 through 16, please provide the data for the fiscal year July 1, 2018, through June 30, 2019.

For those items requesting 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 per line provided to Lifeline customers on their monthly bill.

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.

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. In accordance with Section 364.105, Florida Statutes, are you offering Transitional Lifeline service? If yes, what is the number of customers participating per month and what are your advertising efforts for Transitional Lifeline service?

Response: Global Connection offers Transitional Lifeline service to former Lifeline customers upon their request, with 0 customers participating. Global Connection does not have advertising efforts specific to Transitional Lifeline service.

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

Response: See CONFIDENTIAL Exhibit A.

9. Describe 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: Applications received for wireline subscribers are typically and ordinarily processed with wireline 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 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).
- d. Copies of Lifeline outreach materials of your company.
- e. Any links on your company Web site that provides Lifeline information.
- f. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Response: See CONFIDENTIAL Exhibit B.

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

Response: Yes. See CONFIDENTIAL Exhibit A.

12. To the extent you have experienced a decline in Lifeline customers since last year, 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 Lifeline participation in Florida are welcome.

Response: Customer declines due to competitive pricing continue to occur due to the fact that Global Connection Inc. of America is a reseller of ATT local and long distance customers. As price increases continue to occur, these costs are partially passed along to the end-user, which ultimately results in customer loss. On March 11, 2019, Global Connection Inc. of America filed a petition with the Florida Public Service Commission for relinquishment of its Eligible Telecommunications Carrier (ETC) designation in Florida and the relinquishment was approved on June 28, 2019.

13. Is your company currently providing Lifeline in any of the states where the National Verifier has been implemented? If yes, please identify any issues you have experienced utilizing the National Verifier.

Response: Yes, the Global Connection Inc. of America is currently providing Lifeline in the states that have transitioned to the National Verifier. The National Verifier currently does not have an API which has made it difficult to process enrollments in these states.

14. Are you using the National Lifeline Application/Recertification forms in Florida?

Response: Yes.

15. In the last year, has your company filed for any form of bankruptcy? If yes, please identify the chapter and date filed.

Response: No.

16. Within the last two years, has your company been involved in any FCC enforcement actions? If yes, please provide the FCC docket number.

Response: No.

EXHIBIT A




CONFIDENTIAL AND PROPRIETARY

| | | 2018 | | | | | | 2019 | | | | | |
|----|--|------|---|---|----|----|----|------|---|---|---|---|---|
| | | 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 | | | | | | | | | | | | |

| | | 7 | 8 | 9 | 10 | 11 | 12 | 1 | 2 | 3 | 4 | 5 | 6 |
|--|--|------|------|------|------|------|------|------|------|------|------|------|------|
| | | 2018 | 2018 | 2018 | 2018 | 2018 | 2018 | 2019 | 2019 | 2019 | 2019 | 2019 | 2019 |
| Customer Unable to demonstrate Program Eligibility | | | | | | | | | | | | | |

EXHIBIT B

PUBLIC VERSION

- a. 
- b. 
- c. 
- d. 
- e. 