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May 8, 2020

VIA ELECTRONIC DELIVERY

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: TruConnect Communications, Inc.'s Petition for Declaratory Ruling and
for Designation as an Eligible Telecommunications Carrier

To Whom it May Concern,

TruConnect Communications, Inc. (“TruConnect” or the “Company”) hereby submits the attached Petition for Declaratory Ruling and for Designation as an Eligible Telecommunications Carrier (“ETC”), asserting that the Commission can and should reassert jurisdiction over wireless providers for the purpose of ETC designation, and requesting such designation for TruConnect expeditiously.

As the Commission responds to the ever-changing state and national challenges presented by the COVID-19 pandemic, it is of utmost importance that we, as a society, ensure that the most vulnerable Americans are well served as they prepare for and respond to the COVID-19 virus conditions. Millions of low-income Americans, including residents of Florida, do not have access to affordable telecommunications services necessary to contact healthcare providers and access safe telemedicine services, obtain essential services, or survive in an online-only work and school environment—and many of these Americans are eligible for telecommunications services through the Lifeline program. At this critical time, it is vital that TruConnect have the ability to offer Lifeline in the state of Florida in order to provide telemedicine solutions, enroll more eligible subscribers, and meet the life-threatening needs of many Floridians.

Many low-income residents of Florida have limited access to healthcare in general, and specifically do not have access to telehealth solutions because they either do not have a device, such as a smart phone, to communicate with a healthcare provider, or they cannot afford the additional data required to seamlessly communicate remotely with healthcare providers. It has never been more important than now to remove barriers and open up access to communications and healthcare.

TruConnect proposes to offer Lifeline customers a plan that meets *both* minimum service standards (i.e. 1,000 voice minutes and 3 GB data as of Dec. 1, 2019) for no net cost after application of Lifeline support. Combined with TruConnect's WeFi app, which extends the life of the customer's data, TruConnect's Lifeline service is uniquely suited to meet the needs of consumers now faced with rising data needs to account for telemedicine as well as enable working and schooling from home due to the COVID-19 pandemic. Introducing TruConnect into the market as a wireless ETC provider in Florida will help to close the widening gap for wireless and broadband services and quicken the ability to ensure Lifeline-eligible Floridians have the safety net they need during this national emergency.

As detailed in the attached Petition, TruConnect meets FCC requirements for designation as an ETC and such designation would serve the public interest. TruConnect respectfully requests that the Commission expeditiously issue a determination that the Commission should reinstitute regulation of CMRS services for the purpose of wireless ETC designations, and designate TruConnect as an ETC.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/

Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for TruConnect Communications, Inc.

Attachments

cc: Nathan Johnson

**BEFORE THE
FLORIDA PUBLIC UTILITY COMMISSION**

TruConnect Communications, Inc.)
Petition for Declaratory Ruling and for)
Designation as an Eligible) Docket No. _____
Telecommunications Carrier)
_____)

PETITION

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May 8, 2020

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**BEFORE THE
FLORIDA PUBLIC UTILITY COMMISSION**

TruConnect Communications, Inc.)
Petition for Declaratory Ruling and for)
Designation as an Eligible) Docket No. _____
Telecommunications Carrier)
_____)

I. INTRODUCTION

TruConnect Communications, Inc. (“TruConnect”, or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Florida Public Utility Commission (“Commission” or “FPSC”), hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Florida. TruConnect is a provider of commercial mobile radio service (“CMRS”), which has historically been exempt from Commission regulation, except that the Commission was responsible for wireless ETC designation purposes until the Commission began deferring jurisdiction to the FCC in 2012.³ Therefore, TruConnect also hereby petitions the Commission for a declaratory ruling that the circumstances, as identified herin, now favor that the Commission can and should reassert jurisdiction over wireless providers for the purpose of ETC designation.

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ See attached Exhibit 2 for a sample letter from the Commission stating “The Florida Legislature in 2011 (HB 1231), removed the FPSC authority to designate ETC wireless providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.”

TruConnect seeks ETC designation solely to provide Lifeline service to qualifying Florida consumers; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high cost areas.⁴ As demonstrated herein, and as certified in Exhibit 1 to this Petition, TruConnect meets all the statutory and regulatory requirements for designation as an ETC, including the requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*⁵ and *Lifeline Modernization Order*.⁶ Rapid grant of TruConnect’s request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Floridians as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Petition should be addressed to:

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⁴ Given that the Company only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

⁵ *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 and Link Up Reform Order*”).

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*Third Report and Order*” or “*Lifeline Modernization Order*”).

II. COMPANY OVERVIEW

TruConnect is a Delaware corporation⁷ with its principal office located at 1149 S. Hill Street, Suite H-400, Los Angeles, California 90015. TruConnect Communications, Inc., formerly Telscape Communications, Inc., is a subsidiary of TSC Acquisition Corporation (“TSC”). TSC also owns Sage Telecom Communications, LLC d/b/a TruConnect (“Sage d/b/a TruConnect”), formerly known as Sage Telecom, Inc. before a corporate restructuring in 2012, and the owners of TSC separately own TruConnect Mobile, LLC, which sells mobile hotspot devices and low-cost monthly data plans, as well as TruConnect Technologies, LLC, a mobile data analytics company that develops data intelligence products and services for wireless carriers, cable operators, and content providers.

TruConnect provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of facilities-based providers, primarily T-Mobile USA, Inc. (“T-Mobile”), and also Sprint Spectrum, L.P. (“Sprint”), and Verizon Wireless (“Verizon”), (collectively, “Underlying Carriers”) on a wholesale basis to offer nationwide service. TruConnect obtains from its Underlying Carriers the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”), similar to TracFone Wireless, Inc. (“TracFone”) and Virgin Mobile USA, L.P. (“Virgin Mobile”) which the Commission designated as ETCs, as well as i-wireless, LLC (“i-wireless”) which was granted ETC status in Florida by the FCC.⁸ TruConnect is currently designated and operating as a wireless ETC

⁷ TruConnect was organized in the State of Delaware on June 19, 2001 and has a Certificate of Authority to operate in Florida.

⁸ See *TracFone Wireless, Inc. Application for designation as an eligible telecommunications carrier in the state of Florida for limited purpose of offering lifeline service to qualified households*, Docket No. 070586-TP, Order PSC-08-0418-PAA-TP (made effective and final by Order PSC-08-0467-CO-TP on July 21, 2008) (“*TracFone ETC Order*”); see also *Virgin Mobile USA, L.P. Petition for limited designation as eligible telecommunications carrier*, Docket No. 090245-TP, Order No. PSC-10-0323-PAA-TP (made effective and final by Order PSC-10-0444-CO-TP on July 12, 2010) (“*Virgin Mobile ETC Order*”); see also *i-wireless, LLC Amended Petition for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire,*

in California and the U.S. Virgin Islands, and Sage d/b/a TruConnect is designated and operating as a wireless ETC in Arizona, Arkansas, Colorado, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma, Pennsylvania, Puerto Rico, South Carolina, Texas, Utah, Washington West Virginia and Wisconsin. The Company has applications for ETC designation pending with state public utility commissions in New Jersey and Oregon, and under Sage d/b/a TruConnect in Hawaii and New Mexico and with the FCC (for the states of Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, North Carolina, New York, Tennessee, Virginia, and the District of Columbia, the “Non-Jurisdictional States”).⁹ Due to the FCC’s inaction with regard to ETC petitions as discussed further herein, TruConnect files the instant application with the Commission; if granted, the Company would withdraw Sage d/b/a TruConnect’s request to the FCC for ETC designation in Florida.

TruConnect’s prepaid wireless services are affordable, easy to use, and attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. TruConnect offers consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of its customers in other states, TruConnect anticipates that many of its customers will

North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia, WC Docket No. 09-197, Order, 27 FCC Rcd 6263 (2012) (“*i-wireless ETC Order*”).

⁹ *Sage Telecom Communications, LLC Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia* (Aug. 8, 2013) and *Petition for Limited Designation as an Eligible Telecommunications Carrier in Maine for the Purpose of Lifeline Service* (Dec. 13, 2013), WC Docket No. 09-197, Amended Petition filed Oct. 16, 2018 (“*FCC ETC Petition*”).

be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. TruConnect does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers, TruConnect will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

III. THE COMMISSION CAN AND SHOULD ASSERT JURISDICTION OVER DESIGNATION OF WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.¹⁰ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.¹¹ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1).

A. Background

The Commission began electing not to entertain wireless ETC designation requests in 2012 based upon a change in Florida Statutes (“F.S.”), claiming “Florida Legislature in 2011 (HB 1231), removed [Commission] authority to designate ETC wireless providers.”¹² However, CMRS (and

¹⁰ 47 U.S.C. § 214(e)(2).

¹¹ *USF Order*, at 8858–59, ¶ 145.

¹² *See supra* note 3.

all wireless telecommunications services) was already exempt from Commission jurisdiction prior to 2011, except as “specifically authorized by federal law” as specified by F.S. § 364.011 at the time. HB 1231¹³ simply deleted the quoted language from the statute, which appears to be the statutory change to which the Commission refers as having removed its authority to designate a wireless carrier as an ETC.¹⁴ Regardless, FCC rules did not change, and still *do* authorize the Commission to designate ETCs.

While CMRS remains exempt from Commission jurisdiction, to be exempt is by definition simply to be “*free from an obligation or liability imposed on others.*” Florida Statutes do not explicitly *prohibit* the Commission from entertaining petitions from wireless carriers for ETC designation purposes. In fact, given the nature of the wireless Lifeline marketplace as described below, entertaining wireless ETC petitions like TruConnect’s would accord with the legislative intent set forth in F.S. § 364.01(3):

“The Legislature finds that the competitive provision of telecommunications services...is in the public interest and has provided customers with freedom of choice, encouraged the introduction of new telecommunications service, encouraged technological innovation, and encouraged investment in telecommunications infrastructure.”

If the Commission continues to defer jurisdiction over wireless ETC petitions, then undoubtedly the opposite of the Commission’s intent will occur—as it relates to Lifeline services, competition

¹³ House Bill (HB) 1231 also repealed other portions of Florida Statutes Section 364, but most were unrelated to Lifeline, and none would have otherwise prevented Commission designation of wireless ETCs. See a summary of HB 1231 changes at <https://www.flsenate.gov/Session/Bill/2011/1231>.

¹⁴ See also *Virgin Mobile ETC Order* ¶ 2, which states: “On March 13, 2007, the [Commission] addressed the issue of whether or not the FPSC has jurisdiction to designate [CMRS] providers as [ETCs]. By Order No. PSC-07-0288-PAA-TP, issued April 3, 2007, in Docket Nos. 060581-TP and 060582-TP, we found that with the enactment of Section 364.011, Florida Statutes (F.S.), the Florida Legislature granted this Commission limited authority over CMRS providers for those matters specifically authorized by federal law. Therefore, pursuant to Section 214(e)(2) of the Telecommunications Act of 1996 (the Act), which authorizes states to designate ETC carriers, we have jurisdiction over CMRS providers for the purpose of considering ETC petitions.”

and innovation will continue to be hampered, and Lifeline-eligible consumers will continue to fall through the cracks as discussed below.

B. Lack of Wireless Lifeline Competition and Low Lifeline Penetration Rates

As is, wireless companies must petition the FCC to be designated as an ETC in Florida. There are currently thirty-five (35) wireless ETC designation petitions pending at the FCC, many of which were filed in 2012 or 2013.¹⁵ TruConnect’s own FCC ETC Petition was originally filed in August of 2013. For eight (8) years now, the FCC has created a roadblock to competition in the Non-Jurisdictional States—including Florida—by not processing pending ETC applications. Only three (3) mobile providers such as TruConnect have been approved to provide Lifeline service in Florida: TracFone Wireless (under “SafeLink Wireless”), Virgin Mobile (under “Assurance Wireless”), and i-wireless (under “Access Wireless”). The i-wireless ETC Order was the most recent ETC designation issued by the FCC in June 2012; the FCC has not processed any pending ETC petitions since that time. By this inaction, the FCC continues to favor three (3) particular providers, ultimately putting customers in Florida at a disadvantage compared to other states across the U.S. that have allowed competition. According to USAC,¹⁶ the 2017 estimated Lifeline adoption rate (“take rate”) in Florida was 29%. TruConnect estimates the current take rate to be much less (closer to 15%), and there is an estimated total of more than two (2) million unserved Lifeline-eligible customers in Florida. TruConnect is ready, capable, and willing to serve these customers. Attached Exhibit 3 contains Lifeline disbursement data showing the amount of funds received (divide by \$9.25 for an approximation of number of customers) by all Lifeline carriers in Florida, and showing the trends across 2018 and 2019. Most, if not all, carriers are

¹⁵ See <https://www.fcc.gov/general/lifeline-compliance-plans-etc-petitions>.

¹⁶ <https://www.usac.org/li/about/process-overview/stats/participation.aspx>

stagnant or declining in their numbers. Based on December 2019 data, over 97% of existing Florida Lifeline customers are served by TracFone, Virgin Mobile and i-wireless combined. Clearly, customers are interested in wireless service, and clearly, more market competition is needed in order to reach more Lifeline-eligible customers. TruConnect therefore requests that the Commission expeditiously process the instant Petition so that it can quickly begin expanding the availability of affordable Lifeline-supported wireless services to qualifying low-income customers in Florida.

C. The Commission has the Authority to Process TruConnect’s Petition Under FCC Rules

While F.S. § 364.10 only applies to “Telecommunications Compan[ies],” from which CMRS is excluded, it also only addresses requirements that apply post-ETC designation, and does not contemplate the requirements for an ETC application or Commission processing thereof except for stating, in F.S. § 364.10(1)(a), “...designated as an eligible telecommunications carrier by the commission pursuant to 47 C.F.R. s. 54.201.” The Commission thus processes ETC petitions based upon FCC (and not state-specific) regulations. 47 C.F.R. § 54.201(b) states, “A state commission *shall upon its own motion or upon request* designate a common carrier that meets the requirements of paragraph (d) of this section... .” As identified further herein, TruConnect is a common carrier and meets the requirements of 47 C.F.R. § 54.201(d) and other applicable FCC requirements.

TruConnect recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC’s Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier’s services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking

Lifeline-only ETC designation.¹⁷ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance with the FCC’s grant of forbearance, and therefore, may not apply the facilities-based requirement to TruConnect. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant TruConnect’s request for designation as an ETC throughout the State of Florida.

IV. TRUCONNECT SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201

Section 254(e) of the Act provides that, “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹⁸ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services, except where the FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.¹⁹ As detailed below, TruConnect satisfies each of the above-listed requirements.

¹⁷ See *Lifeline and Link Up Reform Order* at ¶ 368.

¹⁸ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“*USF Order*”).

¹⁹ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

A. TruConnect Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as TruConnect. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:²⁰

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) 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; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.

In accordance with the *Lifeline and Link Up Reform Order*, TruConnect filed a Compliance Plan with the FCC, which the FCC approved on December 26, 2012.²¹ A copy of its FCC-Approved Compliance Plan is attached hereto as Exhibit 4. TruConnect commits to providing Lifeline service in Florida in accordance with its FCC-approved Compliance Plan and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

²⁰ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

²¹ See FCC Public Notice DA 12-2063, https://apps.fcc.gov/edocs_public/attachmatch/DA-12-2063A1_Rcd.pdf.

B. TruConnect Is a Common Carrier

CMRS providers like TruConnect are treated as common carriers.²²

C. TruConnect Will Provide All Supported Services

Through its Underlying Carriers, TruConnect is able to provide all of the supported services required by Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) as follows:

1. Voice Telephony Service

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

Voice Grade Access to the Public Switched Telephone Network. TruConnect provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from its facilities-based underlying carriers.

Local Usage At No Additional Charge. TruConnect offers rate plans that provide its customers with minutes of use for local and long distance service alike at no additional charge beyond the monthly plan rate.

Access to Emergency Services. TruConnect provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. TruConnect also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

²² *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services.*") (emphasis added).

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.²³ “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”²⁴ Nonetheless, TruConnect’s offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. TruConnect’s service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.

2. Broadband Internet Access Services

Broadband Internet access service (“BIAS”) is a supported service as of December 2, 2016. The FCC has stated that BIAS consists of the ability for a user to receive “the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service.”²⁵ TruConnect provides BIAS to low-income consumers via resale of its underlying carriers’ mobile services.

D. TruConnect Requests Designation Throughout Its Service Area

TruConnect is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, TruConnect is required to describe the geographic area(s) within which it requests designation as an ETC. TruConnect requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current coverage map and zip code footprint is attached hereto as Exhibit 5. TruConnect understands that its service area overlaps with rural carriers in

²³ See *Lifeline and Link Up Reform Order* at ¶ 367.

²⁴ See *id.* at ¶ 49.

²⁵ See 47 C.F.R. § 8.2(a).

Florida, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. TruConnect is not eligible for and does not seek Link-Up or high-cost support.

Therefore, designation of TruConnect as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²⁶ While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement), the FCC’s *Lifeline and Link Up Reform Memorandum Opinion and Order* (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.²⁷ In light of this forbearance, the Commission has the authority to designate ETCs such as TruConnect in rural areas without concern for the service area conformance requirement.²⁸

E. TruConnect Will Advertise the Availability of Supported Services

TruConnect will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). TruConnect’s advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined

²⁶ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

²⁷ See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

²⁸ See 47 C.F.R. § 54.207(c).

in TruConnect's Compliance Plan.²⁹ The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as print advertisements, direct marketing, social media and the Internet. TruConnect will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. TruConnect may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

TruConnect will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. TruConnect will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Additionally, TruConnect will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

V. TRUCONNECT SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)

TruConnect hereby provides the additional information and certifications required for carriers seeking ETC designation as set forth in 47 C.F.R. § 54.202(a).

²⁹ See Exhibit 4, section (4). See also *Lifeline and Link Up Reform Order* at Section VII.F.

A. Service Commitment Throughout the Proposed Designated Service Area

TruConnect will provide service in Florida by reselling service which it obtains from its underlying carriers. These providers' networks are operational and largely built out. Thus, TruConnect will be able to commence offering its Lifeline service to all locations served by its underlying carriers very soon after receiving approval from the Commission.

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the certification attached in Exhibit 1, TruConnect commits to comply with the service requirements applicable to the low-income support that it receives. Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. § 54.202(a)(2), TruConnect has the ability to remain functional in emergency situations. As discussed, TruConnect will utilize the extensive and well-established T-Mobile, Sprint and/or Verizon networks and facilities to provide its Lifeline services. The Company understands that the Underlying Carrier networks have access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. Indeed, these Underlying Carriers have repeatedly certified to the FCC that their networks function in emergency situations.³⁰ The Underlying Carriers provide the same functionality to TruConnect and its customers as these carriers provide to themselves and their own customers.

³⁰ See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

C. Commitment to Consumer Protection and Service Quality

In accordance with 47 C.F.R. § 54.202(a)(3), an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. TruConnect hereby commits to comply with the CTIA Consumer Code for Wireless Service.

D. TruConnect is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), TruConnect is financially and technically capable of providing Lifeline-supported services. The Company has been offering telecommunications service since 1998 and began providing non-Lifeline wireless service in October 2012 and Lifeline-supported wireless service in May 2013. TruConnect, in combination with its affiliate Sage d/b/a TruConnect, already successfully provides wireless services nationwide, including Lifeline services in thirty (30) jurisdictions. TruConnect has not been subject to enforcement actions, and has not been subject to ETC revocation proceedings. The Company has operated as a telecommunications carrier for twenty years and has never had to file for bankruptcy protection, and is supported by the resources of its parent, TSC. TruConnect does not, and does not intend to, offer exclusively Lifeline-supported services—and is therefore not exclusively dependent on USAC for its revenue. TruConnect is fully capable of honoring all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of TruConnect has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the

Company.³¹ TruConnect will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carriers.

E. Terms and Conditions of Proposed Lifeline Offering

TruConnect has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout Florida. TruConnect intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and broadband usage. TruConnect commits that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. TruConnect's Lifeline-supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward. To the extent TruConnect provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and TruConnect will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 7 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers can receive 1,000 voice minutes, unlimited text messages, and 3 gigabytes (GB) of data per month at a net cost of \$0.00 after application of Lifeline support. TruConnect's service also includes proprietary software ("WeFi" app) that allows smartphone mobile customers to search for an open WiFi network and connect to it automatically in order to save on their carrier data usage, enabling their data allotment to last longer. Customers will also be able to purchase additional minutes or data as needed. In addition to wholly-supported

³¹ See Exhibit 6 for key management bios.

or discounted wireless services, prepaid Lifeline customers will receive a free SIM card for use in an existing or purchased device, as well as access to voice mail, caller I.D., call forwarding, 3-way calling, and call waiting features at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge, and calls to the Company's customer service are free with no deduction of available minutes. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. The Company's Lifeline offering will provide feature-rich mobile connectivity for qualifying subscribers without the burden of credit checks or service contracts. TruConnect's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

F. TruConnect Will Comply with the Lifeline Certification and Verification Requirements

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier ("National Verifier"), which transfers the responsibility of eligibility determination away from Lifeline providers.³² Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. Customers must then apply directly through the National Verifier, which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier's or Company's website) or request that a copy be mailed to them. TruConnect will rely upon the National Verifier for initial

³² See *Lifeline Modernization Order*, section III.C.

and annual eligibility determination in Florida.³³ Customers in Florida can apply to the National Verifier through a service provider like TruConnect, or on their own by mail or online. TruConnect utilizes the standard Lifeline application/certification forms as required by FCC rules, and thus complies with the disclosure and information collection requirements in 47 C.F.R. § 54.410(d).³⁴

G. Prevention of Waste, Fraud and Abuse

TruConnect recognizes the importance of safeguarding the USF. TruConnect has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. TruConnect complies with the requirements of the National Lifeline Accountability Database (“NLAD”) and section 54.404 of the FCC’s rules. TruConnect will rely on the National Verifier to determine initial and ongoing eligibility of Florida Lifeline subscribers. The National Verifier queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from TruConnect or any other ETC, and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service. In addition, Company personnel emphasize the “one Lifeline service per household” restriction in their direct sales contacts with potential customers.

Moreover, TruConnect will comply with the FCC’s *Fifth Report and Order*, which set forth reforms to strengthen the Lifeline program’s enrollment, recertification, and reimbursement processes, once the rule changes set forth therein become effective.³⁵

³³ See <https://www.usac.org/lifeline/eligibility/national-verifier/launches/national-verifier-december-2019-launch/>; see also <https://www.usac.org/lifeline/eligibility/customer-eligibility/state-eligibility-verification-processes/#d>.

³⁴ *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, “Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program,” DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC’s website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

³⁵ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, “*Fifth*

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), TruConnect will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, TruConnect has developed its own auditing system to process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; (2) Inactive lines receiving subsidy: system compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines; and (3) Subsidies for Deceased subscribers: Death Master search to ensure that subsidies are not requested for a

Report and Order). The order is effective January 27, 2020, except for section 54.406(b) [*Prohibition of commissions for enrollment representatives*], which is effective February 25, 2020, and section 54.406(a) [*Enrollment representative registration*], which is effective March 26, 2020. Revisions to Sections 54.404(b)(12) [*relating to not enrolling/claiming a subscriber unless they are verified to be alive*] and 54.410(f) [*changes to recertification*] are delayed and the FCC will publish a document announcing the effective date.

deceased subscriber. Through the processes described above, TruConnect ensures that it does not over-request from support funds.

VI. DESIGNATION OF TRUCONNECT AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.³⁶ Designation of TruConnect as an ETC in Florida will further that public interest. Whether because of financial constraints, poor credit history, or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. The FCC has in recent years expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”³⁷ Mobile Lifeline service is essential not only for access to telephone service, but also to bridging the digital divide as well as offering low-income Americans better

³⁶ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

³⁷ See *Lifeline Modernization Order* ¶ 2.

access to healthcare through telemedicine. Given this context, designating TruConnect as an ETC would significantly benefit low-income consumers eligible for Lifeline services in Florida—the intended beneficiaries of universal service.

A. Advantages of TruConnect’s Service Offering

The public interest benefits of TruConnect’s wireless service include larger local calling areas (as compared to traditional wireline carriers); the convenience, portability and security afforded by mobile telephone service; the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge; the opportunity for customers to receive both the minimum service standards for voice *and* broadband usage within the same rate plan; the ability of users to use the supported service to send and receive “SMS” or text messages; the ability for customers to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted (and the courtesy of free low-balance alerts); unlimited international calling to Canada, Mexico, and China (first 10 unique numbers each month) at no additional cost, and the option to purchase additional international calling at affordable rates; the opportunity for customers to receive service without going through a credit check or deposit requirement, or committing to a long-term service contract; and access to 911 and E911 (where available) service in accordance with current FCC requirements. Additionally, the inclusion of domestic long distance as a part of TruConnect’s flat-rate wireless offerings allows consumers to avoid the risks of becoming burdened with significant and unexpected per-minute charges for domestic telephone toll and overage charges.

Specifically, as summarized in attached Exhibit 8, TruConnect’s Lifeline rate plan provides more benefits than the plans of other ETCs currently on the market. While there are other plan options that provide either the minimum voice standard *or* the minimum data standard for \$0.00

after application of federal Lifeline support, TruConnect would be the only ETC offering both minimum service standards (i.e. 1,000 voice minutes *and* 3 GB data) for no net cost to Lifeline customers.

Low-income individuals can greatly benefit from the advantages offered by the Company's Lifeline service, which provides access to wholly-supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. It is a commonly accepted fact that in today's market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location. TruConnect's prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues. Providing TruConnect with the authority necessary to offer discounted Lifeline service to those without—or most in danger of losing—wireless service undoubtedly promotes the public interest.

Additionally, designating TruConnect as an ETC in Florida also has the potential to complement the Commission's objectives of promoting broadband adoption under F.S. § 364.0135. TruConnect's Lifeline service includes mobile broadband access that meets the federal minimum service standards in addition to TruConnect's proprietary WeFi app which extends the life of the customer's data. Furthermore, TruConnect is pairing its existing Lifeline service with pursuing telehealth initiatives to better provide medical service for the low-income populations that it already serves. TruConnect has a telehealth pilot under review with the California Public Utilities

Commission and intends to submit a pilot proposal to the FCC. Designation as an ETC in Florida would more effectively allow TruConnect to pursue similar proposals to the benefit of Florida consumers, consistent with the intent of F.S. § 364.0135(2)(d), to:

(d) Encourage the use of broadband Internet service, especially in the rural, unserved, and underserved communities of the state through grant programs having effective strategies to facilitate the statewide deployment of broadband Internet service. For any grants to be awarded, priority must be given to projects that:

1. Provide access to broadband education, awareness, training, access, equipment, and support to libraries, schools, colleges and universities, health care providers, and community support organizations.
2. Encourage the sustainable adoption of broadband in primarily unserved areas by removing barriers to entry.
3. Work toward encouraging investments in establishing affordable and sustainable broadband Internet service in unserved areas of the state.
4. Facilitate the development of applications, programs, and services, including, but not limited to, telework, telemedicine, and e-learning to increase the usage of, and demand for, broadband Internet service in the state.

Given the current national state of emergency due to the novel coronavirus (COVID-19), unprecedented actions have been taken to slow the spread of the virus; millions of Americans are having to work and school from home, and telehealth services have become essential for the safety of patients and providers alike. Unfortunately, millions of low-income Americans do not have access to affordable telecommunications services necessary to contact healthcare providers and access safe telemedicine services, obtain essential services, or survive in an online-only work and school environment—and many of these Americans are eligible for telecommunications services through the Lifeline program. At this critical time, it is vital that the Commission grant TruConnect the ability to offer Lifeline service in Florida so the Company can provide telemedicine solutions, enroll more eligible subscribers, and meet the life-threatening needs of many Floridians.

Finally, grant of TruConnect's Petition will serve the public interest in increasing the number of ETCs in Florida. By granting ETC status to TruConnect, the Commission will enable TruConnect

to increase the number of Floridians receiving Lifeline support, thereby increasing the amount of USF money flowing into Florida. In sum, ETC designation in the State of Florida would enable TruConnect to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile FCC Order*. Namely, TruConnect would provide “increased consumer choice, high-quality service offerings, and mobility,”³⁸ as well as the safety and security of effective 911 and E911 services.³⁹

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.⁴⁰ Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of TruConnect as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.⁴¹ Introducing TruConnect into the market as an additional wireless ETC provider will afford low-income Florida residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

³⁸ See *Petition of Virgin Mobile USA, L.P. for Forbearance from 47 U.C.S. § 214(e)(1)(A) and Petition for ETC Designation in New York, Virginia, North Carolina, and Tennessee*, CC Docket No. 96-45, Order, 24 FCC Rcd 3381 (2009) (“*Virgin Mobile FCC Order*”) ¶ 38.

³⁹ See *Id.* at 3391 ¶ 23.

⁴⁰ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

⁴¹ See 47 U.S.C. § 254(b)(1).

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as TruConnect or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, TruConnect will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that TruConnect's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. TruConnect's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

VII. CONCLUSION

Based on the foregoing, designation of TruConnect as an ETC in the State of Florida accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, TruConnect respectfully requests that the Commission promptly issue a determination that the Commission should reinstitute regulation of CMRS services for the purpose of wireless ETC designations, and designate TruConnect as an ETC in the State of Florida for the purpose of participating in the Lifeline program.

Respectfully submitted,

/s/

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E-Mail: lsteinhart@telecomcounsel.com

Attorneys for TruConnect Communications, Inc.

May 8, 2020

EXHIBIT 1

Certification

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I, Nathan Johnson, the Co-CEO (Co-Chief Executive Officer) of TruConnect Communications, Inc., hereby depose and state that I have read the foregoing Petition and know the contents thereof, and confirm that the statements made therein are true to the best of my knowledge and belief.



Nathan Johnson, Co-CEO

EXHIBIT 2

Commission Jurisdictional Statement

COMMISSIONERS:
ART GRAHAM, CHAIRMAN
LISA POLAK EDGAR
RONALD A. BRISÉ
EDUARDO E. BALBIS
JULIE I. BROWN

STATE OF FLORIDA



GENERAL COUNSEL
S. CURTIS KISER
(850) 413-6199

Public Service Commission

June 2, 2011

Mr. Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 115
Alpharetta, GA 30005

Re: Docket No. 110101-TP – i-wireless, LLC's ETC designation

Dear Mr. Steinhart:

We received your May 20, 2011 letter requesting a statement that the Florida Public Service Commission's jurisdiction to grant ETC designation to i-wireless, LLC changed with Governor Scott's approval of HB 1231, the telecom reform bill. In your letter, you mentioned that i-wireless, LLC is a commercial mobile radio service provider.

This letter acknowledges that Governor Scott's approval of HB 1231, the telecom reform bill, revises Chapter 364, Florida Statutes, thereby changing the Commission's jurisdiction regarding telecommunications companies. I direct your attention to Chapter 364, Florida Statutes, including the revisions by HB 1231 for the proposition that the Federal Communications Commission, rather than this Commission is the appropriate agency to consider i-wireless, LLC's bid for ETC status.

Sincerely,

A handwritten signature in black ink that reads "S. Curtis Kiser".

S. Curtis Kiser
General Counsel

cc: Beth W. Salak, Director, Division of Regulatory Analysis
Robert J. Casey, Public Utilities Supervisor, Division of Regulatory Analysis
Adam J. Teitzman, Attorney Supervisor, Office of the General Counsel
Ann Cole, Commission Clerk, Office of Commission Clerk

EXHIBIT 3

Disbursement Data

State	Company Name (Top 3)	Lifeline \$	Mo/Year
FL	TRACFONE WIRELESS INC.	\$3,407,081.00	Jan-18
FL	TRACFONE WIRELESS INC.	\$3,397,414.00	Feb-18
FL	TRACFONE WIRELESS INC.	\$3,373,733.00	Mar-18
FL	TRACFONE WIRELESS INC.	\$3,360,969.00	Apr-18
FL	TRACFONE WIRELESS INC.	\$2,460,160.00	May-18
FL	TRACFONE WIRELESS INC.	\$2,273,780.00	Jun-18
FL	TRACFONE WIRELESS INC.	\$2,191,398.00	Jul-18
FL	TRACFONE WIRELESS INC.	\$2,106,623.00	Aug-18
FL	TRACFONE WIRELESS INC.	\$2,022,134.00	Sep-18
FL	TRACFONE WIRELESS INC.	\$1,922,133.00	Oct-18
FL	TRACFONE WIRELESS INC.	\$1,897,776.00	Nov-18
FL	TRACFONE WIRELESS INC.	\$1,746,555.00	Dec-18
FL	TRACFONE WIRELESS INC.	\$1,772,596.00	Jan-19
FL	TRACFONE WIRELESS INC.	\$1,712,175.00	Feb-19
FL	TRACFONE WIRELESS INC.	\$1,664,067.00	Mar-19
FL	TRACFONE WIRELESS INC.	\$1,652,383.00	Apr-19
FL	TRACFONE WIRELESS INC.	\$1,630,160.00	May-19
FL	TRACFONE WIRELESS INC.	\$1,605,689.00	Jun-19
FL	TRACFONE WIRELESS INC.	\$1,553,686.00	Jul-19
FL	TRACFONE WIRELESS INC.	\$1,520,923.00	Aug-19
FL	TRACFONE WIRELESS INC.	\$1,472,018.00	Sep-19
FL	TRACFONE WIRELESS INC.	\$1,450,511.00	Oct-19
FL	TRACFONE WIRELESS INC.	\$1,409,681.00	Nov-19
FL	TRACFONE WIRELESS INC.	\$1,366,937.00	Dec-19
FL	VIRGIN MOBILE USA LP	\$2,857,436.00	Jan-18
FL	VIRGIN MOBILE USA LP	\$3,161,964.00	Feb-18
FL	VIRGIN MOBILE USA LP	\$3,405,452.00	Mar-18
FL	VIRGIN MOBILE USA LP	\$3,582,027.00	Apr-18
FL	VIRGIN MOBILE USA LP	\$3,680,539.00	May-18
FL	VIRGIN MOBILE USA LP	\$3,810,353.00	Jun-18
FL	VIRGIN MOBILE USA LP	\$3,874,585.00	Jul-18
FL	VIRGIN MOBILE USA LP	\$3,864,187.00	Aug-18
FL	VIRGIN MOBILE USA LP	\$3,857,131.00	Sep-18
FL	VIRGIN MOBILE USA LP	\$3,882,836.00	Oct-18
FL	VIRGIN MOBILE USA LP	\$3,856,640.00	Nov-18
FL	VIRGIN MOBILE USA LP	\$3,819,613.00	Dec-18
FL	VIRGIN MOBILE USA LP	\$3,823,617.00	Jan-19
FL	VIRGIN MOBILE USA LP	\$3,772,511.00	Feb-19
FL	VIRGIN MOBILE USA LP	\$3,732,032.00	Mar-19
FL	VIRGIN MOBILE USA LP	\$3,747,878.00	Apr-19
FL	VIRGIN MOBILE USA LP	\$3,746,944.00	May-19
FL	VIRGIN MOBILE USA LP	\$3,778,172.00	Jun-19
FL	VIRGIN MOBILE USA LP	\$3,802,806.00	Jul-19
FL	VIRGIN MOBILE USA LP	\$3,719,444.00	Aug-19
FL	VIRGIN MOBILE USA LP	\$2,248,833.00	Sep-19
FL	VIRGIN MOBILE USA LP	\$1,460,298.00	Oct-19
FL	VIRGIN MOBILE USA LP	\$1,834,479.00	Nov-19
FL	VIRGIN MOBILE USA LP	\$1,904,482.00	Dec-19

State	Company Name (Top 3)	Lifeline \$	Mo/Year
FL	I-WIRELESS LLC	\$636,557.00	Jan-18
FL	I-WIRELESS LLC	\$611,851.00	Feb-18
FL	I-WIRELESS LLC	\$583,768.00	Mar-18
FL	I-WIRELESS LLC	\$552,383.00	Apr-18
FL	I-WIRELESS LLC	\$367,299.00	May-18
FL	I-WIRELESS LLC	\$322,215.00	Jun-18
FL	I-WIRELESS LLC	\$294,835.00	Jul-18
FL	I-WIRELESS LLC	\$272,394.00	Aug-18
FL	I-WIRELESS LLC	\$252,442.00	Sep-18
FL	I-WIRELESS LLC	\$234,793.00	Oct-18
FL	I-WIRELESS LLC	\$218,060.00	Nov-18
FL	I-WIRELESS LLC	\$206,090.00	Dec-18
FL	I-WIRELESS LLC	\$194,916.00	Jan-19
FL	I-WIRELESS LLC	\$184,103.00	Feb-19
FL	I-WIRELESS LLC	\$174,547.00	Mar-19
FL	I-WIRELESS LLC	\$162,421.00	Apr-19
FL	I-WIRELESS LLC	\$153,467.00	May-19
FL	I-WIRELESS LLC	\$144,596.00	Jun-19
FL	I-WIRELESS LLC	\$136,854.00	Jul-19
FL	I-WIRELESS LLC	\$129,195.00	Aug-19
FL	I-WIRELESS LLC	\$121,971.00	Sep-19
FL	I-WIRELESS LLC	\$117,605.00	Oct-19
FL	I-WIRELESS LLC	\$109,595.00	Nov-19
FL	I-WIRELESS LLC	\$102,287.00	Dec-19

State	SAC	Name	Lifeline \$	Mo/Year
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$352.00	Jan-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$352.00	Feb-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$333.00	Mar-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$324.00	Apr-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$324.00	May-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Jun-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Jul-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Aug-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Sep-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Oct-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Nov-19
FL	210291	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$305.00	Dec-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$157.00	Jan-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$157.00	Feb-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$166.00	Mar-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$157.00	Apr-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$148.00	May-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$166.00	Jun-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$176.00	Jul-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$176.00	Aug-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$157.00	Sep-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$166.00	Oct-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$176.00	Nov-19
FL	210318	FRONTIER COMMUNICATIONS OF THE SOUTH LLC	\$185.00	Dec-19
FL	210328	FRONTIER FLORIDA LLC	\$17,335.00	Jan-19
FL	210328	FRONTIER FLORIDA LLC	\$17,141.00	Feb-19
FL	210328	FRONTIER FLORIDA LLC	\$17,122.00	Mar-19
FL	210328	FRONTIER FLORIDA LLC	\$16,318.00	Apr-19
FL	210328	FRONTIER FLORIDA LLC	\$15,447.00	May-19
FL	210328	FRONTIER FLORIDA LLC	\$15,337.00	Jun-19
FL	210328	FRONTIER FLORIDA LLC	\$15,448.00	Jul-19
FL	210328	FRONTIER FLORIDA LLC	\$15,633.00	Aug-19
FL	210328	FRONTIER FLORIDA LLC	\$15,633.00	Sep-19
FL	210328	FRONTIER FLORIDA LLC	\$15,975.00	Oct-19
FL	210328	FRONTIER FLORIDA LLC	\$15,013.00	Nov-19
FL	210328	FRONTIER FLORIDA LLC	\$14,514.00	Dec-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,055.00	Jan-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,036.00	Feb-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$999.00	Mar-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,027.00	Apr-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,008.00	May-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$897.00	Jun-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$870.00	Jul-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$879.00	Aug-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$823.00	Sep-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$833.00	Oct-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$796.00	Nov-19
FL	210329	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$796.00	Dec-19

State	SAC	Name	Lifeline \$	Mo/Year
FL	210330	SMART CITY TELECOMMUNICATIONS	\$84.00	Feb-19
FL	210330	SMART CITY TELECOMMUNICATIONS LLC	\$84.00	Apr-19
FL	210330	SMART CITY TELECOMMUNICATIONS LLC	(\$167.00)	Jun-19
FL	210330	SMART CITY TELECOMMUNICATIONS LLC	\$84.00	Jul-19
FL	210330	SMART CITY TELECOMMUNICATIONS LLC	\$84.00	Nov-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$204.00	Jan-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS	\$222.00	Feb-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$232.00	Mar-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$222.00	Apr-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$195.00	May-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$46.00	Jun-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$185.00	Jul-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$194.00	Aug-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$194.00	Sep-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$203.00	Oct-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$195.00	Nov-19
FL	210331	ITS TELECOMMUNICATIONS SYSTEMS INC.	\$204.00	Dec-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$2,091.00	Jan-19
FL	210335	NORTHEAST FLORIDA TEL. CO., INC.	\$2,183.00	Feb-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$2,229.00	Mar-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$2,183.00	Apr-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$2,174.00	May-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$2,146.00	Jun-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$2,072.00	Jul-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$889.00	Aug-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$1,906.00	Sep-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$1,934.00	Oct-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$1,897.00	Nov-19
FL	210335	NORTHEAST FLORIDA TELEPHONE COMPANY	\$1,878.00	Dec-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,562.00	Jan-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,746.00	Feb-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,664.00	Mar-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,451.00	Apr-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,349.00	May-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,136.00	Jun-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,321.00	Jul-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$9,343.00	Aug-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$24,560.00	Oct-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,220.00	Nov-19
FL	210336	WINDSTREAM COMMUNICATIONS LLC	\$12,053.00	Dec-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$980.00	Jan-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$888.00	Feb-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$953.00	Mar-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$981.00	Apr-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$972.00	May-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$2,026.00	Jul-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$1,036.00	Aug-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$916.00	Sep-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$1,064.00	Oct-19
FL	210338	QUINCY TELEPHONE COMPANY (FLORIDA)	\$1,055.00	Nov-19

State	SAC	Name	Lifeline \$	Mo/Year
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$2,193.00	Jan-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$2,183.00	Feb-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$2,174.00	Mar-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$2,156.00	Apr-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$2,081.00	May-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,924.00	Jun-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,970.00	Jul-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,999.00	Aug-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,934.00	Sep-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,998.00	Oct-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,961.00	Nov-19
FL	210339	CONSOLIDATED COMMUNICATIONS OF FLORIDA COMPANY	\$1,905.00	Dec-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$46,657.00	Jan-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$43,300.00	Feb-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$43,540.00	Mar-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$41,800.00	Apr-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$41,144.00	May-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$41,173.00	Jun-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$39,535.00	Jul-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$39,461.00	Aug-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$38,221.00	Sep-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$37,731.00	Oct-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$20,831.00	Nov-19
FL	210341	CENTURYLINK-EMBARQ FLORIDA INC. (FKA EMBARQ)	\$36,084.00	Dec-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$1,860.00	Apr-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$1,702.00	May-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$1,693.00	Jun-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$823.00	Jul-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$814.00	Aug-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$805.00	Sep-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$666.00	Oct-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$805.00	Nov-19
FL	215191	BELLSOUTH TELECOMMUNICATIONS LLC	\$759.00	Dec-19
FL	219013	T-MOBILE USA INC.	\$16,428.00	Jan-19
FL	219013	T-MOBILE USA INC.	\$18,500.00	Feb-19
FL	219013	T-MOBILE USA INC.	\$19,140.00	Mar-19
FL	219013	T-MOBILE USA INC.	\$20,481.00	Apr-19
FL	219013	T-MOBILE USA INC.	\$22,015.00	May-19
FL	219013	T-MOBILE USA INC.	\$23,024.00	Jun-19
FL	219013	T-MOBILE USA INC.	\$49,295.00	Aug-19
FL	219013	T-MOBILE USA INC.	\$25,511.00	Sep-19
FL	219013	T-MOBILE USA INC.	\$25,393.00	Oct-19
FL	219013	T-MOBILE USA INC.	\$24,984.00	Nov-19
FL	219013	T-MOBILE USA INC.	\$25,003.00	Dec-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	\$37.00	Jan-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	\$37.00	Feb-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	\$28.00	Mar-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	\$19.00	Apr-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	\$9.00	May-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	\$9.00	Jun-19
FL	219016	GLOBAL CONNECTION INC OF AMERICA	(\$601.00)	Aug-19

State	SAC	Name	Lifeline \$	Mo/Year
FL	219017	TELE CIRCUIT NETWORK CORP	\$305.00	Jan-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$296.00	Feb-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$194.00	Mar-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$268.00	Apr-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$305.00	May-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$315.00	Jun-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$324.00	Jul-19
FL	219017	TELE CIRCUIT NETWORK CORP	(\$10,841.00)	Aug-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$342.00	Sep-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$352.00	Oct-19
FL	219017	TELE CIRCUIT NETWORK CORP	\$352.00	Nov-19
FL	219019	COX FLORIDA TELCOM LP	\$4,570.00	Jan-19
FL	219019	COX FLORIDA TELCOM LP	\$4,607.00	Feb-19
FL	219019	COX FLORIDA TELCOM LP	\$4,616.00	Mar-19
FL	219019	COX FLORIDA TELCOM LP	\$4,644.00	Apr-19
FL	219019	COX FLORIDA TELCOM LP	\$4,736.00	May-19
FL	219019	COX FLORIDA TELCOM LP	\$4,264.00	Jun-19
FL	219019	COX FLORIDA TELCOM LP	\$3,783.00	Jul-19
FL	219019	COX FLORIDA TELCOM LP	\$3,071.00	Aug-19
FL	219020	PHONE CLUB CORPORATION	\$1,092.00	Jan-19
FL	219020	PHONE CLUB CORPORATION	\$1,119.00	Feb-19
FL	219020	PHONE CLUB CORPORATION	\$1,295.00	Mar-19
FL	219020	PHONE CLUB CORPORATION	\$1,388.00	Apr-19
FL	219020	PHONE CLUB CORPORATION	\$1,443.00	May-19
FL	219020	PHONE CLUB CORPORATION	\$1,462.00	Jun-19
FL	219020	PHONE CLUB CORPORATION	\$1,462.00	Jul-19
FL	219020	PHONE CLUB CORPORATION	\$1,471.00	Aug-19
FL	219020	PHONE CLUB CORPORATION	\$1,452.00	Sep-19
FL	219020	PHONE CLUB CORPORATION	\$1,462.00	Oct-19
FL	219020	PHONE CLUB CORPORATION	\$1,499.00	Nov-19
FL	219020	PHONE CLUB CORPORATION	\$1,489.00	Dec-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$370.00	Jan-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$380.00	Feb-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$416.00	Mar-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$435.00	Apr-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$463.00	May-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$454.00	Jun-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$464.00	Jul-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$473.00	Aug-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$454.00	Sep-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$463.00	Oct-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$463.00	Nov-19
FL	219904	KNOLOGY OF FLORIDA INC.	\$426.00	Dec-19

EXHIBIT 4

FCC-Approved Compliance Plan

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

_____)	
In the Matter of)	
)	
Federal-State Joint Board on)	WC Docket No. 09-197
Universal Service)	
)	
Lifeline and Link Up Reform Modernization))	WC Docket No. 11-42
)	
_____)	

REVISED COMPLIANCE PLAN OF TELSCAPE COMMUNICATIONS, INC.

Telscape Communications, Inc. dba Telscape Wireless (“Telscape”), by its attorneys, respectfully submits this Revised Compliance Plan (“Plan”). Telscape’s original Compliance Plan was filed July 2, 2012, and an initial revised version of the plan was filed September 24, 2012.

In the *Lifeline Reform Order*,¹ the Commission adopted rules and procedures through which it instituted “blanket forbearance” from the applications of the facilities requirement to all telecommunications carriers seeking a limited ETC designation to provide wireless Lifeline services. In order to qualify for this blanket forbearance, the Commission requires carriers to comply with certain 911 requirements and file and receive approval of a compliance plan providing specific information about its service offerings and procedures to safeguard against waste, fraud and abuse.

¹ *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 11-12, ¶ 172 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

Therefore, Telscape respectfully submits this Plan in accordance with the Lifeline Reform Order and instructions set forth in the Wireline Competition Bureau *Public Notice* issued on February 29, 2012.² Telscape seeks approval of this compliance plan only for the provision of Lifeline support to provide wireless services nationwide, as the company offers wireline service as a facilities-based carrier under the approval of state commissions. This Plan sets forth Telscape's service offerings and the procedures and measures it will use to safeguard against waste, fraud and abuse. In support of this request, Telscape provides the following information:

(1) Information about the carrier and the Lifeline plans it intends to offer:

(a) names and identifiers used by the carrier, its holding company, operating company and all affiliates;

Telscape is a competitive local exchange carrier ("CLEC") based in Los Angeles, California. The company has provided traditional wireline service since 1996 and wireless service in California as a non-ETC carrier since 2007. Telscape is also a provider of broadband Internet services. Telscape's service primarily focuses on offering specialized services to meet the needs of the Spanish-speaking market, as well as low-income consumers. Telscape is also an ETC in California, having provided wireline service to low income consumers under California's state low income support program. Telscape has authority to operate as a wireless ETC from the California PUC as well.

Telscape is a Delaware corporation with offices located at 355 South Grand Avenue, Ste. 3100, Los Angeles, CA 90071. Telscape has authority to provide local exchange and interstate

² Public Notice, Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, DA 12-314, (Rel. Feb. 29, 2012).

telecommunications services in California and seven other states.³ On October 6, 2011, the California Public Utilities Commission designated Telscape as an ETC for both wireless and wireline services in the state of California for purposes of participating in the Lifeline program. Telscape provides its wireless service under the name “Telscape Wireless” and does not offer wireless services under any other brand or company names.

Telscape is wholly-owned by TSC Acquisition Corporation (“TSC”). On July 2, 2012, TSC completed its acquisition of Sage Telecom, Inc. (“Sage”), a CLEC that provides service in numerous states including Arkansas, California, Connecticut, Illinois, Kansas, Michigan, Missouri, Ohio, Oklahoma, Nevada, Texas and Wisconsin. Sage’s service to customers in these 12 states complements, in part, Telscape’s focus on the southwestern United States. As a result of the acquisition, Telscape, through its common ownership with Sage, has gained collective access to a broader market and combined subscriber growth. The majority of Sage’s current customers are non-Lifeline customer, but Sage currently has wireline Lifeline customers in five states for which it is reimbursed through both state and federal programs, depending upon the state and the customer.⁴ In addition, through this combined ownership, Telscape has also gained access to the expertise of Sage’s managers and operations.⁵

Telscape is also affiliated with TruConnect Mobile, LLC (“TruConnect”), through partial common ownership. TruConnect is 40% owned by TSC, Telscape’s parent company as described above. TruConnect provides mobile broadband data services and does not provide any services supported by the low income program.

³ These states are Arizona, Florida, Illinois, Nevada, New York, New Jersey and Texas.

⁴ In California, Sage receives support only from the CPUC’s Low Income Programs. Sage also receives support from state programs in Kansas, Texas and Wisconsin. Sage receives support on a federal level for service in these three states and Oklahoma.

⁵ Additional information concerning TSC ownership structure and qualifications is set forth in its application to acquire Sage Telecom, Inc. filed in WC Docket No. 12-119.

(b) detailed information demonstrating the carrier is financially and technically capable of providing the supported Lifeline services in compliance with the Commission's rules;

As a long-time provider of both wireline and wireless services in California, Telscape has a proven record of technical and financial qualifications. For example, Telscape owns and operates its own switching facilities back-office and operations support systems ("OSS"), which allows it to operate at lower costs and pass those savings on to its subscribers. Throughout the years, Telscape has invested substantial revenue to develop, integrate and maintain its systems.

As a carrier who has provided service in California for over 15 years, Telscape possesses the financial viability, as well as the expertise to continue to provide affordable and quality service to customers and has the proven experience to maintain its compliance with all applicable federal and state regulatory guidelines. Telscape derives the majority of its revenue from the telecommunications services it provides to its customers. Telscape does not and will not rely exclusively on the Universal Service Fund ("USF") disbursements to operate, but rather relies on revenues it receives from providing non-Lifeline wireline and wireless service, the payment for service by Lifeline customers,⁶ as well as high-speed Internet services. In addition, Telscape is a fully audited corporation and has not been subject to any type of enforcement action or ETC revocation proceeding by the FCC or California.

Telscape is already working with Sprint Spectrum and resells Sprint's wireless services to its non-Lifeline customers in California. As a Lifeline service provider, Telscape will continue to work with Sprint, who provides the necessary network infrastructure and wireless facilities necessary for the operation of Telscape's services as a Mobile Virtual Network Operator ("MVNO"). As the Commission is aware, Sprint is a large, nationwide carrier who provides

⁶ All of Telscape's Lifeline wireline customers currently pay a monthly fee for the discounted service.

similar service to other wireless Lifeline providers operating as MVNOs. Telscape's agreement and partnership with Sprint further demonstrates its financial and technical capability to provide these services.

(c) detailed information, including geographic locations, of the carrier's current service offerings if the carrier currently offers service;

As detailed in response to Question 1(a) above, Telscape currently provides local and interstate wireline and wireless services in California as well as broadband Internet services in that state.

(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided and additional charges, if any, for toll calls;

At this time, Telscape plans to offer the following Lifeline plans and services to customers in California and eventually similar plans nationwide. The California service plans are listed below and were approved by the CPUC as part of the ETC application process. The basic plan provides 300 minutes a month to Lifeline customers for \$2.50 a month. A similar plan is marketed to non-lifeline customers at \$15.00, but would be discounted to \$2.50 for Lifeline eligible customers (after reimbursement). All plans require a monthly payment by the customer.

Plan 1 – 300 Minutes \$2.50 a month	
Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
Voicemail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	\$1.50 per call

Plan 2 – 1,100 Minutes \$20.00 a month

Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
Voicemail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	\$1.50 per call

Additional Minutes. For both Plans above, if the subscriber wishes to purchase additional minutes, they may do so at any time during a given month and such minutes will be available at \$0.03 per minute, with a minimum purchase of 200 minutes. For example, 200 additional minutes will cost \$6.00 and 500 additional minutes will cost \$15.00.

Text Messages. Plans above include text messaging and text messages will be assessed at a rate of 1 minute per text message sent and 1 minute per text message received. In other words, each text message is the equivalent of one minute of calling.

Other. Telscape's plans will include a free handset and the customer calling features listed above. Customers are not limited by a local calling area and may use the minutes for any type of call other than international calls. Calls to 911 are free and customers may call 911 regardless of the availability of minutes. There is a \$30.00 activation fee for Telscape wireless service.

Outside of California, Telscape will offer plans similar to the following, subject to state specific requirements or requests from state PUCs. As with California, these plans are offered to both Lifeline and non-Lifeline subscribers, with a discount applied to the Lifeline customer. Services will be offered on a prepaid basis, and potentially also on a postpaid basis, as is done in California. All services will normally have an activation fee and will likely require a monthly payment from the customer. The prices listed below show the basic, non-Lifeline price and the price to the consumer with the \$9.25 Lifeline credit applied. All plans will likely require a monthly payment by the customer. Telscape commits to providing a minimum of 250 minutes per month for the \$9.25 subsidy.

Telscape is still determining the exact plans it will offer (reiterating the condition that plans will provide a minimum of 250 minutes for the \$9.25 subsidy), but a sample plan would be as follows:

ValuMobile Plus Price: \$24.25 per month/Lifeline Price: \$15.00

Features	Cost
500 minutes Voice/Text	Included
Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
VoiceMail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	\$1.50

Activation Fee: \$25.00

Additional Minutes: For all service plans the customer can purchase additional voice, data, MMS, text minutes for \$0.05 per minute with a minimum purchase of \$5.00. For example, 100 additional minutes will cost \$5.00. The customer will have the ability to purchase 100 minutes (\$5.00); 200 minutes (\$10.00); 300 minutes (\$15.00) and 500 minutes (\$25.00). For Unlimited service plans the customer will not need additional voice or text but will need to purchase additional minutes for data and MMS. MMS is priced at \$0.15 per minute and Data is \$0.05 per MB.

Text Messages: The service plans include text messaging; text messaging rates are assessed at 1 minute per text message sent and 1 minute per text message received.

Other: Plans do not permit rollover minutes. Top Ups are available for a 30 day period as long as the customer renews the service at the normal plan rate. Plans do not allow roaming. The \$25.00 Activation Fee includes selection of a basic handset which is activated and provided ready for use. Customers are allowed to call internationally but will be assessed the international rates. International text rates are \$0.20 per minute for messages sent or received. Special Promotional offer: 10 MB data FREE for 3 months with the selection of a data capable phone.

(e) all other certifications required under newly amended section 54.202 of the Commission's rules.

Section 54.202 requires ETCs to (1) certify that it will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the

network unless the ETC is receiving only Lifeline support; (3) demonstrate that it will continue to function in emergency situations including reasonable back-up backup power and emergency traffic management; (4) demonstrate that the carrier will comply with applicable consumer protection and service quality standards; (5) demonstrate that it is financially and technical qualified to provide Lifeline services that comply with the applicable rules; and (6) provide information concerning the terms and conditions of the service plans offered to Lifeline customers.

In response to item (1), Telscape certifies that it will comply with applicable service requirements and regulations for Lifeline support.

In response to item (2), Telscape is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers.

In response to item (3), as a CLEC provider in California for over 15 years, Telscape has significant experience with emergency preparedness. Telscape has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies.. In addition, Telscape's agreement with Sprint provides for the continuation of services during emergencies and sets forth obligations for the service to remain functioning during disasters and similar emergency situations. In addition, as a nationwide carrier and provider of wireless service, Sprint also remains subject to the Commission's authority and must, and does, comply with federal outage reporting requirements.

In response to item (4), Telscape certifies that it will comply with the applicable consumer protection and service quality standards. As a CLEC operating in California, Telscape is already subject to that state's consumer protection and service quality requirements. Telscape's Lifeline customers will also receive the same quality service and protections.

Telscape's response to items (5) and (6) are provided above and in the provided exhibits

(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all consumer eligibility, consumer enrollment and re-certification procedures as required by Section VI and Appendix C of the Lifeline Reform Order, and a copy of the carrier's certification form;

Under the *Lifeline Reform Order*, ETCs must comply with eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, Telscape must also comply with all certification and verification requirements for Lifeline eligibility established by states where Telscape is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certifications and annual certifications, Telscape certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification.

In states where there is a third party entity acting as the Lifeline administrator (also referred to as the "Certifying Agent" in California) who is responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the appropriate approval of a potential

subscriber's eligibility for Lifeline, Telscape will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator.

Based on Telscape's history of providing Lifeline and non-Lifeline customers in wireline products, Telscape's primary source of signing up Lifeline customers will be via telephone, although some customers (entirely in California at this point) will be signed up in person at the retail locations staffed by Telscape employees. Visitors to Telscape's website will be given information about the program but are required to contact Telscape directly via telephone to complete the sign-up process. These callers speak to Telscape employees who are specially trained on the Lifeline programs. Telscape's customer services representatives will review income- and program-based requirements with applicants via telephone contact or point of sale contact at one of Telscape's retail locations.⁷ During the initial sign up for service, Telscape will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.

Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. If, after the verification process is completed, the customer is deemed eligible, they are credited with the

⁷ For example, Telscape has retail store locations called "Telemercados" throughout its service areas in the Los Angeles and San Diego, California areas to provide its subscribers the opportunity to walk in and deal with a Telscape representative directly, as well as over 380 authorized payment locations throughout all of Southern California.

Lifeline discount back to the date service was initiated. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed.

The Verification process varies by state, in states with a Lifeline administrator, if a new applicant indicates that he or she is eligible for Lifeline service, Telscape will provide the applicant's relevant information to the administrator in conformance with any state or Lifeline administrator specific rules. The Lifeline administrator will provide the requisite forms and will be responsible for processing those forms when returned and ensuring the documentation is satisfactory as set forth in state regulations. Telscape will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility from the Lifeline administrator.

In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, Telscape will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Sections 54.409(a)(1) or (a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, Telscape will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. Telscape will inform the applicant that any information provided

will be submitted to USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support.

After confirming initial eligibility either in person or over the phone, Telscape will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation.

Specifically, Telscape's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's full name; (ii) the subscriber's full residential street address (P.O. Boxes will not be acceptable); (iii) whether the residential address is permanent or temporary; (iv) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (vii) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, Telscape will require all Lifeline applicants to certify, under penalty of perjury, that:

- the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;
- the applicant has provided documentation to Telscape that correctly and accurately confirms the subscriber's household income or participation in the above-listed

program(s);

- the applicant will notify its carrier within thirty (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 subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify Telscape;
- if the applicant moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within thirty (30) days;
- if the applicant provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every ninety (90) days;
- the applicant acknowledges that the subscriber will 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 his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- the applicant's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- the information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per-household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- the applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- the applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not receive more than one Lifeline benefit and consenting to the inclusion of that information into a Lifeline database.

A sample Telscape application is attached hereto as Exhibit A.

This application is mailed by Telscape to the customer for completion and is returned to Telscape for review and certification. All applications are reviewed by Telscape employees or

by employees of their affiliate Sage. Should Telscape engage sales agents to assist in signing up customers, those applications will also be reviewed by employees to ensure the applicant's eligibility.⁸ This review includes a review to determine eligibility as well as a duplicate review process described below. Telscape will make itself available as a direct point of contact with all Lifeline applicants, either in person through its employees, or by telephone. In addition, all Telscape employees who have contact with potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If Telscape cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, Telscape personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then Telscape will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income-eligibility or program-based eligibility, Telscape will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility.⁹ In addition, if the subscriber provides Telscape with a temporary address, it will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Telscape within 30 days, the subscriber will be de-enrolled from the Lifeline program.

Procedures for Annual Re-Certification. Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is

⁸ In states with a Lifeline Administrator, this process would be handled pursuant to the procedures of the Administrator.

⁹ 47 C.F.R. §§ 54.410(b)(1)(ii)-(iii) and 54.410(c)(1)(ii)-(iii).

responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certifications, Telscape will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to Telscape that a current subscriber did not re-certify, then Telscape will comply with the de-enrollment requirements required by the FCC's rules. Telscape will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures.

In states where there is not a Lifeline administrator, Telscape will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.410(f)(2) and (f)(5) and 54.405(e)(4). Telscape may complete the re-certification process on a rolling basis throughout the year. If Telscape cannot determine on-going eligibility by accessing a qualifying database, Telscape will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone, by text message, by email or otherwise through the Internet.¹⁰ Alternatively, beginning in 2013, Telscape may elect to have the USAC administer the annual self-certification process.¹¹

As part of the re-certification process, Telscape will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact Telscape for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, Telscape will

¹⁰ *Lifeline Reform Order*, ¶ 130.

¹¹ *Id.*, ¶ 133.

send a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.¹²

(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access;

The Commission conditioned its grant of forbearance on an ETC (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) 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.¹³ Telscape's wireless service currently complies with these requirements and will continue to comply with these conditions.

Specifically, Telscape provides its wireless subscribers with 911/E911 access at the time their service is initiated, regardless of activation status and availability of minutes and provides its subscribers with E911-compliant handsets. It is the company's practice to provide access to 911/E911 to the extent these services are available from the underlying carrier, Sprint. Telscape also enables 911 emergency calling from all properly activated handsets regardless of whether the account associated with the handset is active, suspended to terminated. Telscape will transmit all 911 calls initiated from any of its handsets even if the associated account has no remaining minutes.

In addition, all phones provided by Telscape are 911/E911 compliant. Telscape uses phones from Sprint that, based on representations made to Telscape by Sprint, have been through the applicable certification process in the company's labs. In the event that a customer does not have an E911-complaint handset, Telscape will replace it with a compliant handset at no charge.

¹² 47 C.F.R. § 54.405(e)(4).

¹³ *Lifeline Reform Order*, ¶ 373.

All new customers who qualify for Lifeline services with Telscape will receive a 911/E911-compliant handset free of charge.

(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;

Telscape has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline to its customers. Given the make-up of its customer base, primarily limited English speaking consumers, some of whom are of lower income, Telscape strives to use language that is easily understandable so as to avoid customer confusion. With respect to its wireless services, Telscape will emphasize in clear, easily understood language: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. Telscape will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Telscape has and will continue to clearly disclose its name (Telscape or Telscape Wireless) on all marketing materials. A sample advertisement that was approved for use in California by the California PUC is attached hereto as Exhibit B. Marketing outside of California will contain similar disclosures.

(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.

Telscape fully understand and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program. This is part of the reason that Telscape has

focused on providing excellent service for low-income customers, many of whom speak only Spanish. Moreover, Telscape has taken a focused approach and offering service initially only in California, as compared to launching services into several states or on a nationwide basis. This approach has allowed Telscape to refine its business practices and to implement policies consistent with the Commission's goal of minimizing waste, fraud and abuse before launching its service nationwide at some time in the future.

Prevention of Duplicates In Telscape's Subscriber Base. At time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits the Telscape subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, Telscape can check it in available databases or provide it to the Lifeline administrator, where applicable, to be checked against addresses for all Lifeline customer addresses for the entire state. For example, if an existing Lifeline subscriber, regardless of the carrier providing service, is receiving service at the same address, Telscape understands that the California Lifeline administrator will provide Telscape with a denial and that Lifeline applicant will be denied. Telscape further understands, for example purposes, that the California Lifeline administrator also has a process to check its database for the same subscriber name, date of birth and the last four digits of the person's social security number.

In addition, while it is anticipated that Telscape and its affiliate, Sage will only operate in different states, to the extent that they have Lifeline customers in the same state, customers can be checked against each company's records to further avoid duplication.

Activation and Non-Usage Policy. In California, Telscape does not consider a wireless subscriber activated until the customer has chosen a *non-Lifeline* service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this “prequalification guideline” prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer’s eligibility has been confirmed and approved by the Lifeline administrator. As such, Telscape will not seek reimbursement for any wireless subscriber until the subscriber activates service and is approved by the Lifeline administrator or by Telscape, in states without a third party Lifeline administrator. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive their handset and service until they have an order processed and the activation fee is paid, customers receive activated handsets. Thus, there is no possibility of Telscape receiving reimbursement for a customer who does not have an active handset. After the order is processed, Telscape personnel activate, configure and test the handsets before they are sent to the consumer. Thus all customers receive an activated handset.

As required by the *Lifeline Reform Order*, Telscape has implemented a non-usage policy under which it will de-enroll Lifeline customers that have not used the Telscape’s Lifeline service for 60 consecutive days. When consumers sign-up for Telscape’s service, Telscape will inform them about the usage requirement. If a Telscape Lifeline customer’s account does not reflect any usage during any consecutive 60-day period, Telscape will deactivate the customer’s Lifeline service. Accounts will be deemed active if the Lifeline subscriber: (a) completes an outbound call; (b) purchases minutes or an additional month of service to add to the subscriber's

Lifeline service plan; (c) answers an incoming call from a party other than Telscape, its agent or representative; or (d) responds to a direct contact from Telscape and confirms that he or she wants to continue receiving the Lifeline service.¹⁴

For Lifeline subscribers failing to use their Lifeline service for a 60-day consecutive period as described above, Telscape will provide a clear, easily understood notice that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage. Telscape will not terminate service to Lifeline subscribers that use their Lifeline service within 30 days of Telscape providing said notice.¹⁵

Cooperate with Federal and State Regulators and Lifeline Administrators. Telscape will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. Telscape will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a Telscape Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability Database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service; and
- Comply with federal and state audit requirements.

¹⁴ See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

¹⁵ 47 C.F.R. § 54.405(e)(3).

CONCLUSION

Telscape respectfully submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*. Accordingly, Telscape respectfully requests approval of this Compliance Plan so that Telscape can provide essential Lifeline wireless service to eligible low-income customers nationwide.

Respectfully submitted,

/s/ electronically signed

Douglas D. Orvis II
Kimberly A. Lacey
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006

Date: December 19, 2012

EXHIBIT 5

Coverage Area

TruConnect – Current Zip Code Coverage in Florida

32003	32086	32149	32221	32315	32407	32512
32004	32087	32157	32222	32316	32408	32513
32006	32091	32158	32223	32317	32409	32514
32007	32092	32159	32224	32318	32410	32516
32008	32094	32160	32225	32320	32411	32520
32009	32095	32162	32226	32321	32412	32521
32011	32096	32163	32227	32322	32413	32522
32013	32097	32164	32228	32323	32417	32523
32024	32099	32168	32229	32324	32420	32524
32025	32102	32169	32231	32326	32422	32526
32026	32105	32170	32232	32327	32424	32530
32030	32110	32173	32233	32328	32425	32531
32033	32111	32174	32234	32330	32426	32533
32034	32112	32175	32235	32331	32427	32534
32035	32113	32176	32236	32332	32428	32535
32038	32114	32177	32237	32333	32430	32536
32040	32115	32178	32238	32334	32431	32537
32041	32116	32179	32239	32335	32433	32539
32042	32117	32180	32240	32336	32434	32540
32043	32118	32181	32241	32337	32435	32541
32044	32119	32182	32244	32340	32437	32542
32046	32120	32183	32245	32341	32438	32544
32050	32121	32185	32246	32343	32439	32547
32052	32122	32187	32247	32344	32440	32548
32054	32123	32189	32250	32345	32442	32549
32055	32124	32190	32254	32346	32444	32550
32056	32125	32192	32255	32347	32446	32559
32058	32126	32193	32256	32348	32449	32560
32059	32127	32195	32257	32350	32452	32561
32060	32128	32198	32258	32351	32455	32562
32061	32129	32201	32259	32352	32456	32563
32062	32130	32202	32260	32353	32457	32564
32063	32131	32203	32266	32355	32459	32565
32064	32132	32204	32277	32356	32461	32566
32065	32133	32205	32301	32357	32462	32567
32066	32134	32206	32302	32358	32463	32568
32067	32135	32207	32303	32359	32465	32569
32068	32136	32208	32304	32360	32466	32570
32071	32137	32209	32305	32361	32501	32571
32072	32138	32210	32306	32362	32502	32572
32073	32139	32211	32307	32395	32503	32577
32079	32140	32212	32308	32399	32504	32578
32080	32141	32214	32309	32401	32505	32579
32081	32142	32216	32310	32402	32506	32580
32082	32143	32217	32311	32403	32507	32583
32083	32145	32218	32312	32404	32508	32588
32084	32147	32219	32313	32405	32509	32591
32085	32148	32220	32314	32406	32511	32601

TruConnect – Current Zip Code Coverage in Florida

32602	32686	32757	32818	32906	32978	33062
32603	32692	32759	32819	32907	33001	33063
32604	32693	32762	32820	32908	33002	33064
32605	32694	32763	32821	32909	33004	33065
32606	32696	32764	32822	32910	33008	33066
32607	32697	32765	32824	32911	33009	33067
32608	32701	32766	32825	32912	33010	33068
32609	32702	32767	32826	32919	33011	33069
32610	32703	32768	32827	32920	33012	33070
32611	32704	32771	32828	32922	33013	33071
32612	32706	32772	32829	32923	33014	33072
32614	32707	32773	32830	32924	33015	33073
32615	32708	32774	32831	32925	33016	33074
32616	32709	32775	32832	32926	33017	33075
32617	32710	32776	32833	32927	33018	33076
32618	32712	32777	32834	32931	33019	33077
32619	32713	32778	32835	32932	33020	33081
32621	32714	32779	32836	32934	33021	33082
32622	32715	32780	32837	32935	33022	33083
32625	32716	32781	32839	32936	33023	33084
32626	32718	32783	32853	32937	33024	33090
32627	32719	32784	32854	32940	33025	33092
32628	32720	32789	32855	32941	33026	33093
32631	32721	32790	32856	32948	33027	33097
32633	32722	32791	32857	32949	33028	33101
32634	32723	32792	32858	32950	33029	33102
32635	32724	32793	32859	32951	33030	33106
32639	32725	32794	32860	32952	33031	33109
32640	32726	32795	32861	32953	33032	33111
32641	32727	32796	32862	32954	33033	33112
32643	32728	32798	32867	32955	33034	33114
32644	32730	32799	32868	32956	33035	33116
32648	32732	32801	32869	32957	33036	33119
32653	32733	32802	32872	32958	33037	33122
32654	32735	32803	32877	32959	33039	33124
32655	32736	32804	32878	32960	33040	33125
32656	32738	32805	32885	32961	33041	33126
32658	32739	32806	32886	32962	33042	33127
32662	32744	32807	32887	32963	33043	33128
32663	32745	32808	32891	32964	33045	33129
32664	32746	32809	32896	32965	33050	33130
32666	32747	32810	32897	32966	33051	33131
32667	32750	32811	32899	32967	33052	33132
32668	32751	32812	32901	32968	33054	33133
32669	32752	32814	32902	32969	33055	33134
32680	32753	32815	32903	32970	33056	33135
32681	32754	32816	32904	32971	33060	33136
32683	32756	32817	32905	32976	33061	33137

TruConnect – Current Zip Code Coverage in Florida

33138	33189	33316	33416	33473	33558	33619
33139	33190	33317	33417	33474	33559	33620
33140	33191	33318	33418	33475	33563	33621
33141	33192	33319	33419	33476	33564	33622
33142	33193	33320	33420	33477	33565	33623
33143	33194	33321	33421	33478	33566	33624
33144	33195	33322	33422	33480	33567	33625
33145	33196	33323	33424	33481	33568	33626
33146	33197	33324	33425	33482	33569	33629
33147	33198	33325	33426	33483	33570	33630
33149	33199	33326	33427	33484	33571	33631
33150	33206	33327	33428	33486	33572	33633
33151	33222	33328	33429	33487	33573	33634
33152	33231	33329	33430	33488	33574	33635
33153	33233	33330	33431	33493	33575	33637
33154	33234	33331	33432	33496	33576	33646
33155	33238	33332	33433	33497	33578	33647
33156	33239	33334	33434	33498	33579	33650
33157	33242	33335	33435	33499	33583	33655
33158	33243	33336	33436	33503	33584	33660
33160	33245	33337	33437	33508	33585	33661
33161	33247	33338	33438	33509	33586	33662
33162	33255	33339	33440	33510	33587	33663
33163	33256	33340	33441	33511	33592	33664
33164	33257	33345	33442	33513	33593	33672
33165	33261	33346	33443	33514	33594	33673
33166	33265	33348	33444	33521	33595	33674
33167	33266	33349	33445	33523	33596	33675
33168	33269	33351	33446	33524	33597	33677
33169	33280	33355	33448	33525	33598	33679
33170	33283	33359	33449	33526	33601	33680
33172	33296	33388	33454	33527	33602	33681
33173	33299	33394	33455	33530	33603	33682
33174	33301	33401	33458	33534	33604	33684
33175	33302	33402	33459	33537	33605	33685
33176	33303	33403	33460	33538	33606	33686
33177	33304	33404	33461	33539	33607	33687
33178	33305	33405	33462	33540	33608	33688
33179	33306	33406	33463	33541	33609	33689
33180	33307	33407	33464	33542	33610	33694
33181	33308	33408	33465	33543	33611	33701
33182	33309	33409	33466	33544	33612	33702
33183	33310	33410	33467	33545	33613	33703
33184	33311	33411	33468	33547	33614	33704
33185	33312	33412	33469	33548	33615	33705
33186	33313	33413	33470	33549	33616	33706
33187	33314	33414	33471	33550	33617	33707
33188	33315	33415	33472	33556	33618	33708

TruConnect – Current Zip Code Coverage in Florida

33709	33782	33859	33927	34107	34230	34428
33710	33784	33860	33928	34108	34231	34429
33711	33785	33862	33929	34109	34232	34430
33712	33786	33863	33930	34110	34233	34431
33713	33801	33865	33931	34112	34234	34432
33714	33802	33867	33932	34113	34235	34433
33715	33803	33868	33935	34114	34236	34434
33716	33804	33870	33936	34116	34237	34436
33729	33805	33871	33938	34117	34238	34441
33730	33806	33872	33944	34119	34239	34442
33731	33807	33873	33945	34120	34240	34445
33732	33809	33875	33946	34133	34241	34446
33733	33810	33876	33947	34134	34242	34447
33734	33811	33877	33948	34135	34243	34448
33736	33812	33880	33949	34136	34249	34449
33738	33813	33881	33950	34137	34250	34450
33740	33815	33882	33951	34138	34251	34451
33741	33820	33883	33952	34139	34260	34452
33742	33823	33884	33953	34140	34264	34453
33743	33825	33885	33954	34141	34265	34460
33744	33826	33888	33955	34142	34266	34461
33747	33827	33890	33956	34143	34267	34464
33755	33830	33896	33957	34145	34268	34465
33756	33831	33897	33960	34146	34269	34470
33757	33834	33898	33965	34201	34270	34471
33758	33835	33901	33966	34202	34272	34472
33759	33836	33902	33967	34203	34274	34473
33760	33837	33903	33970	34204	34275	34474
33761	33838	33904	33971	34205	34276	34475
33762	33839	33905	33972	34206	34277	34476
33763	33840	33906	33973	34207	34278	34477
33764	33841	33907	33974	34208	34280	34478
33765	33843	33908	33975	34209	34281	34479
33766	33844	33909	33976	34210	34282	34480
33767	33845	33910	33980	34211	34284	34481
33769	33846	33911	33981	34212	34285	34482
33770	33847	33912	33982	34215	34286	34483
33771	33848	33913	33983	34216	34287	34484
33772	33849	33914	33990	34217	34288	34487
33773	33850	33915	33991	34218	34289	34488
33774	33851	33916	33993	34219	34290	34489
33775	33852	33917	33994	34220	34291	34491
33776	33853	33918	34101	34221	34292	34492
33777	33854	33919	34102	34222	34293	34498
33778	33855	33920	34103	34223	34295	34601
33779	33856	33921	34104	34224	34420	34602
33780	33857	33922	34105	34228	34421	34603
33781	33858	33924	34106	34229	34423	34604

TruConnect – Current Zip Code Coverage in Florida

34605	34731	34958
34606	34734	34972
34607	34736	34973
34608	34737	34974
34609	34739	34979
34610	34740	34981
34611	34741	34982
34613	34742	34983
34614	34743	34984
34636	34744	34985
34637	34745	34986
34638	34746	34987
34639	34747	34988
34652	34748	34990
34653	34749	34991
34654	34753	34992
34655	34755	34994
34656	34756	34995
34660	34758	34996
34661	34759	34997
34667	34760	
34668	34761	
34669	34762	
34673	34769	
34674	34770	
34677	34771	
34679	34772	
34680	34773	
34681	34777	
34682	34778	
34683	34785	
34684	34786	
34685	34787	
34688	34788	
34689	34789	
34690	34797	
34691	34945	
34692	34946	
34695	34947	
34697	34948	
34698	34949	
34705	34950	
34711	34951	
34712	34952	
34713	34953	
34714	34954	
34715	34956	
34729	34957	

TruConnect – Florida Coverage Map

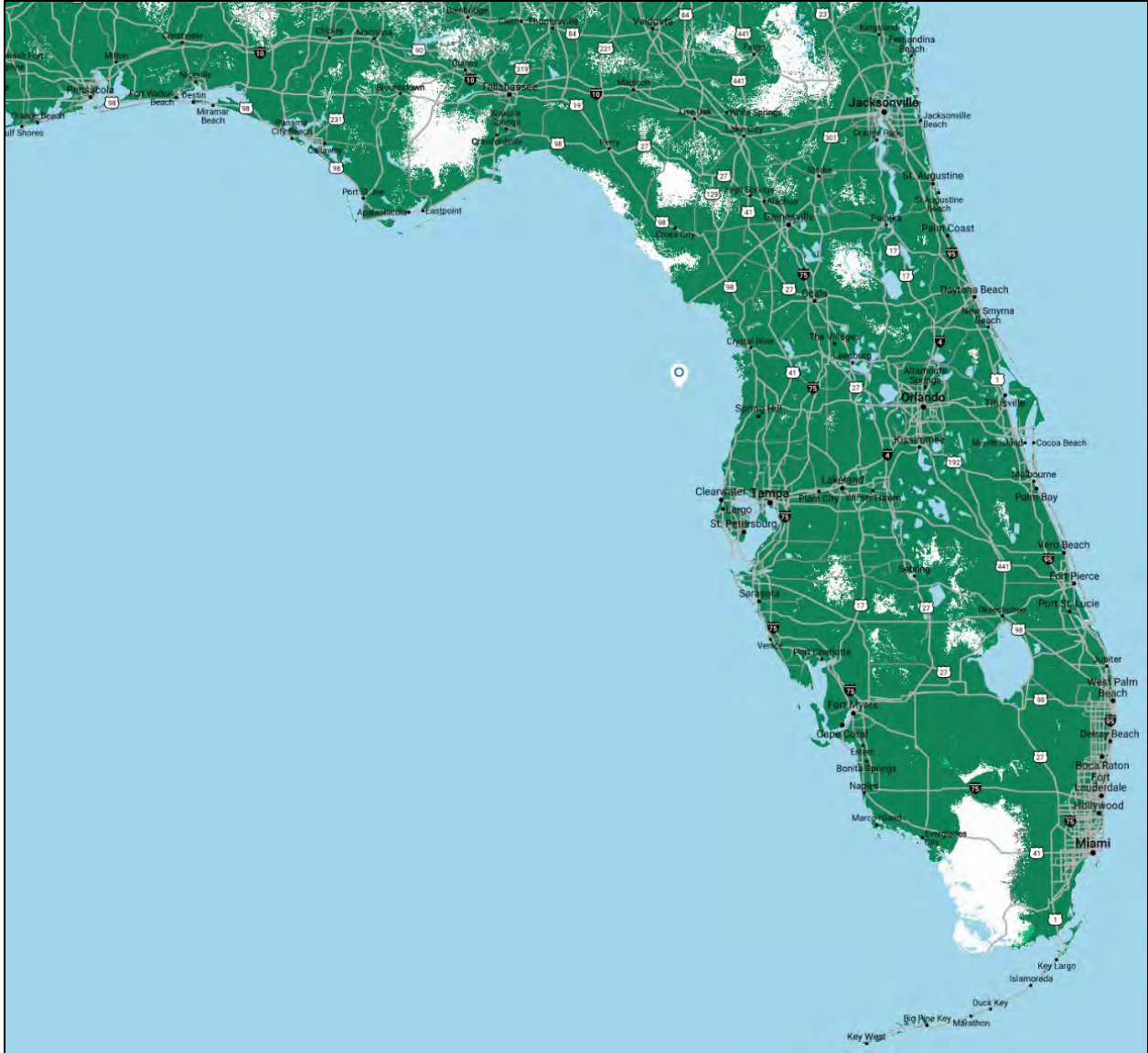


EXHIBIT 6

Key Management Bios

TruConnect Communications, Inc.
Executive Bios

Nathan R. Johnson, Co-Chief Executive Officer

Nathan Johnson is Executive Chairman of the Board and an investor in TruConnect Communications, Inc., where he oversees the strategic vision and effective governance of the organization. Mr. Johnson is also a Managing Partner of Gemini Partners, a middle-market investment bank, where he has financed, sold, and advised several small- and middle-market telecommunications companies including Telemac, Distributive Networks, and Pulse Entertainment, among others. Prior to Gemini Partners, Mr. Johnson served as Vice President in investment banking at Deutsche Bank, where he advised several Latin American companies including Telefonos de Peru and a Venezuelan phone company in their efforts to take the companies private. Mr. Johnson received his MBA from the Wharton School at the University of Pennsylvania with a concentration in Finance and Multinational Management. He also received his MA from the University of Pennsylvania with concentrations in Latin America and Spanish.

Matthew H. Johnson, Co-Chief Executive Officer

Matthew Johnson is Managing Partner of Gemini Partners and a Board Member and investor of TruConnect Communications, Inc. At Gemini Partners, a middle-market investment bank, Mr. Johnson has financed, sold, and advised several small- and middle-market telecommunications companies including Telemac, Distributive Networks, and Pulse Entertainment, among others. Previously, Mr. Johnson served as Vice President in investment banking at Credit Suisse First Boston where he financed numerous telecommunications companies specifically located in Latin America, including Bestel Communications, a company that operated fiber loops stretching from the U.S. to Mexico, and Globopar, a telecommunications and media conglomerate based in Brazil. Mr. Johnson holds an MBA from Northwestern University's Kellogg School of Management.

Jeffrey Misthal, Chief Financial Officer

Mr. Misthal is the Chief Financial Officer responsible for all accounting and finance functions for the company. He has 20 years of finance experience working with technology companies, including Leaf Group and Yahoo, and as an investment banker for GCA Savvian and JPMorgan where he was an advisor for technology companies responsible for mergers and acquisitions and arranging financing for his clients. Mr. Misthal holds a BS in Economics from the Wharton School at the University of Pennsylvania and an MBA from UCLA Anderson.

Lucy Sung, General Manager, Global Operations

Ms. Sung is the General Manager of Global Operations and leads the Legal, Compliance, Customer Care, Sales Operations, Human Resources, and Billing Operations teams. She has over 30 years of experience in the wireless carrier industry, and has 15 years of experience managing the operations and expansion of wireless ETCs. She has held senior management positions in companies that include AT&T, among others. Ms. Sung holds a Bachelor of Science Degree in Business Administration.

Aleksandr Gudkov, Chief Technology Officer

Mr. Gudkov is the Chief Technology Officer and leads all Business Intelligence, data warehouse, and technology related initiatives. Mr. Gudkov has over 18 years of experience in information technology supporting private, state and local governments. He has managed several large-scale integration and migration initiatives for the California Lifeline program, CEL child care eligibility system, and Arizona APS energy income eligibility program. Mr. Gudkov holds a Master of Science degree in Nuclear Engineering from National Research Nuclear University, Moscow Russia.

Danielle Perry, Chief Information Officer

Danielle Perry is the Chief Information Officer and is responsible for leading all technology related aspects of the business; from software development to data analytics. Ms. Perry has over 20 years of experience in the telecommunications field, with 8 of those years being focused on Lifeline. In her previous position she was the Chief Information Officer at Blue Jay Wireless.

EXHIBIT 7

Proposed Lifeline Offering

TruConnect Communications, Inc.
Lifeline Offering

Terms & Conditions maintained at www.truconnect.com

Plan	Minutes	Text	Data	Net Cost to Lifeline Customer
Basic Lifeline Plan	1,000	Unlimited	3.0 GB	\$ 0.00

Plans Include:

- Free SIM card
- Free calls to Company Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, Call Waiting, Call Forwarding, and 3-Way Calling
- Free Domestic Long Distance
- Unlimited Calls to Canada, Mexico, and China (first 10 unique numbers each month)
- Data at 3G speeds or higher

Additional airtime available for purchase

Voice, Data, and International Talk refill options are maintained on the Company's website:
<https://www.truconnect.com/international>

EXHIBIT 8

Rate Plan Comparisons

	Plan	Voice Minutes	Text Messages (SMS)	Broadband Usage	Net Lifeline Cost
TruConnect	Option 1	1,000	Unlimited	3 GB	\$0.00
Virgin Mobile USA, L.P. d/b/a Assurance Wireless	Option 1	350	Unlimited	3 GB	\$0.00
i-wireless, LLC d/b/a Access Wireless	Option 1	250	Unlimited	3 GB	\$0.00
Tracfone Wireless, Inc. d/b/a Safelink Wireless	Option 1	350	Unlimited	3 GB	\$0.00
T-Mobile	Option 1 ("Essentials")	Unlimited	Unlimited	Unlimited smartphone data on network (speeds vary)	\$50.75 for 1 line (plus taxes/fees)

Competitor rates as advertised on respective websites:

<https://www.assurancewireless.com/legal/terms-and-conditions>

<https://www.accesswireless.com/lifeline>

<https://www.safelinkwireless.com/Enrollment/Safelink/en/Web/www/default/index.html#!/planFeatures>

<https://www.t-mobile.com/cell-phone-plans>