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August 9, 2019

VIA FEDERAL EXPRESS

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

REDACTED

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2019 AUG 13 AM 10:18
COMMISSION CLERK

Re: 2019 Annual Lifeline Data Request (i-wireless, LLC)
CONFIDENTIAL TREATMENT REQUESTED

To Whom It May Concern:

i-wireless, LLC ("i-wireless") hereby files an original and two (2) redacted copies of its responses to the 2019 Annual Lifeline Data Request.

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

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. If you have any questions or need additional information, please do not hesitate to contact me at 678-672-2831 or etc@telecomcounsel.com. Thank you for your attention to this matter.

Sincerely,



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

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM 2
CLK _____

CLEC AND WIRELESS LIFELINE DATA REQUEST 2019

To assist the Florida Public Service Commission in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 15, 2019. Your response should include your company name, contact person, and email address.**

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

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

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

Response: See Confidential Exhibit A

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

Response: See Confidential Exhibit A

3. The amount of Lifeline credit per line provided to Lifeline customers on their monthly bill.

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

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

Response: See Confidential Exhibit A

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

Response: See Confidential Exhibit A

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

Response: See Confidential Exhibit A

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

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

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

Response: See Confidential Exhibit A

9. Describe the amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

Response: All applications for in-person distribution are reviewed in real-time by the Review Team. All applications taken online or received by mail are reviewed within 24 hours by the Review Team. A customer's Lifeline benefit will automatically be credited to their account upon successful activation and use of the handset.

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

- a. Internal procedures for promoting Lifeline.
- b. Outreach and educational efforts involving participation in community events.
- c. Outreach and educational efforts involving mass media (newspaper, radio, television).
- d. Copies of Lifeline outreach materials of your company.
- e. Any links on your company Web site that provides Lifeline information.
- f. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Response: See Confidential Exhibit B.

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

Response: No, i-wireless did not provide Lifeline services using resale Lifeline lines obtained from an underlying carrier.

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

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

13. Is your company currently providing Lifeline in any of the first six States that have transitioned to the National Verifier? If yes, please identify any issues you have experienced utilizing the National Verifier.

Response: Yes, i-wireless is currently providing Lifeline in the states that have transitioned to the National Verifier. The National Verifier currently does not have an API which has made it difficult to process enrollments in these states.

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

Response: Yes, i-wireless is using the National Lifeline Application/Recertification forms in Florida.

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

Response: i-wireless has not filed for any form of bankruptcy.

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

Response: i-wireless has not been involved in any FCC enforcement actions.

EXHIBIT A

PUBLIC VERSION

PUBLIC VERSION

	Total residential access lines in service	Total End of Period Lifeline customers	New Lifeline customers enrolled	Lifeline customers de-enrolled	Transitional Lifeline Participants	Tribal Lifeline customers
7 2018						
8 2018						
9 2018						
10 2018						
11 2018						
12 2018						
1 2019						
2 2019						
3 2019						
4 2019						
5 2019						
6 2019						

Number of customers denied Lifeline service, by category

	NLAD Failures, Invalid Address, Name/DOB Mismatch
7 2018	
8 2018	
9 2018	
10 2018	
11 2018	
12 2018	
1 2019	
2 2019	
3 2019	
4 2019	
5 2019	
6 2019	

PUBLIC VERSION

EXHIBIT B

PUBLIC VERSION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. Copies of sample Access Wireless outreach materials are attached for reference.

e. www.accesswireless.com/lifeline

[REDACTED]



Free Smartphone

Two Rate Plans to Choose From:

250 Minutes		750 Minutes
Unlimited Text	OR	Unlimited Text
1 GB of Data		50 MB of Data

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

To apply, visit www.accesswireless.com

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WIRELESS®

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Need More Airtime?



Redeem an Access Wireless or i-wireless PIN or use a debit or credit card to purchase data.



\$10

500 Minutes, Unlimited Text
& 500 MB of Data for 30 days
Electronic PIN; at select locations



\$25

Unlimited Minutes, Unlimited
Text & 1 GB of Data for 30 days



\$35

Unlimited Minutes, Unlimited
Text & 2.5 GB of Data for 30 days



\$50

Unlimited Minutes, Unlimited
Text & 4 GB of Data for 30 days

\$5

250 Minutes, Unlimited Text
& 250 MB of Data for 30 days
Electronic PIN; at select locations

Earn Free Wireless Rewards



You can earn FREE Wireless Rewards in the checkout line when you shop at participating Kroger-owned stores and use your Shopper's or Rewards Card. For every 100 points you earn, you'll receive a FREE Wireless Reward.**



Call 611 from your Access Wireless phone to register.

Unlimited does not mean unreasonable. If you subscribe to rate plans, services or features that are described as unlimited, you should be aware that such "unlimited" plans are subject to the Prohibitive Network Uses policy. Subscribers in approved LifeLine status will receive a monthly LifeLine credit applied on the same date each month. The account will reset each month when the monthly LifeLine credit is applied. Any unused minutes or data from the monthly LifeLine credit will not carry over to the next month.

Minutes, texts or data added as a result of a top-up payment will be used after the monthly LifeLine credit has been exhausted. Any unused minutes, texts or data will last for 30 days from the date that the funds were applied to the account.

Subscribers must be registered for the Wireless Rewards program in order to be eligible to receive Wireless Rewards on qualifying purchases at participating Kroger family store locations. Wireless Rewards will be applied in increments of 20 voice minutes or 20 megabytes of data as determined by rate plan type, for every 100 points earned in-store on qualifying purchases. Any unused Wireless Rewards will carry over each month until the voice minute (2,000) cap or data cap (5 GB) is met. Some restrictions apply. For details on the Wireless Rewards program, visit www.accesswireless.com/rewards. Subscribers in a non-approved LifeLine status will be moved to the Access Basic plan. Any unused minutes or data from the monthly LifeLine credit will be lost. Minutes, texts or data added as a result of a top-up payment or earned Wireless Reward will automatically carry over for 30 days from the date of status change.

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless, LLC, d/b/a Access Wireless, which is an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount, consisting of either wireline or wireless, or broadband internet access service, may be received per household. Violation of the one-per-household rule constitutes a violation of the FCC's rules and will result in the customer's de-enrollment from Lifeline and potentially prosecution from the United States government. Only eligible customers may enroll in the program. Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Customers must present proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records, and any discrepancies could result in delays in your approval or rejection of service.

Free phone is provided by Access Wireless in accordance with its Handset Policy. Phone model may vary based on inventory availability and is at the discretion of i-wireless LLC. Access Wireless network services are provided on the Nationwide Sprint Network. Sprint is a trademark of Sprint Nextel. Android is a trademark of Google Inc.

** FREE Wireless Rewards are earned on qualifying purchases only. SNAP/Food Stamp purchases may be eligible for loyalty rewards program. Access Wireless users must be registered for the FREE Wireless Rewards program in order to receive rewards. Some restrictions apply. For details on the FREE Wireless Rewards program, visit www.accesswireless.com/rewards.

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Smartphone**

**1000 Minutes
Unlimited Text
50 MB of Data**

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To apply, visit www.accesswireless.com/lifeline

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WIRELESS**®

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Need More Airtime?



Redeem an Access Wireless or i-wireless PIN or use a debit or credit card to purchase data.



\$10

500 Minutes, Unlimited Text & 500 MB of Data for 30 days
Electronic PIN; at select locations



\$25

Unlimited Minutes, Unlimited Text & 2 GB of Data for 30 days



\$35

Unlimited Minutes, Unlimited Text & 3 GB of Data for 30 days



\$50

Unlimited Minutes, Unlimited Text & 10 GB of Data for 30 days



\$5

250 Minutes, Unlimited Text & 250 MB of Data for 30 days
Electronic PIN; at select locations

Earn Free Wireless Rewards



You can earn FREE Wireless Rewards in the checkout line when you shop at participating Kroger-owned stores and use your Shopper's or Rewards Card. For every 100 points you earn, you'll receive a FREE Wireless Reward.**



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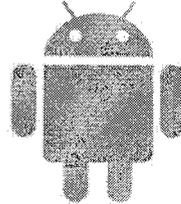
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Free Smartphone

1000 Minutes
Unlimited Text
50 MB of Data

Access to jobs.

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

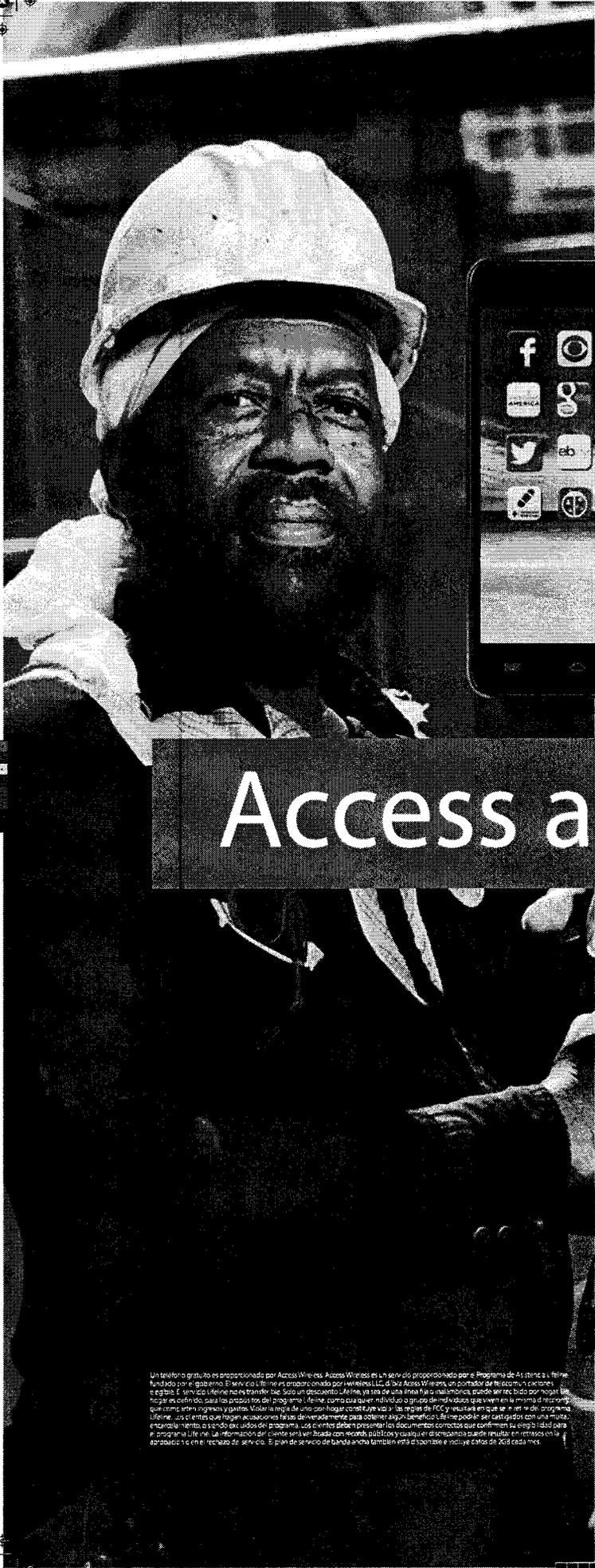
Call
1-888-450-1838

www.accesswireless.com/lifeline

Free phone is provided by Access Wireless. Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by Access Wireless, an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount, consisting of wireless, wireless, or broadband internet access service, may be received per household. A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live at the same address and share income and expenses. A household is not permitted to receive benefits from multiple providers. Violation of the FCC rules and will result in disqualification from the Lifeline program. Customers who willfully make false statements, in order to obtain a Lifeline benefit, can be punished by fine, imprisonment, or both. Customers must present proper documentation confirming the eligibility for the Lifeline program. Customer information will be shared with public, private, and other agencies to assist in eligibility determination. Broadband service is also available and includes 2GB data each month.

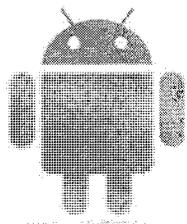
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WIRELESS**

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Teléfono Gratis

1000 Minutos
Textos Ilimitados
50 MB de Datos



Access a trabajos.

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

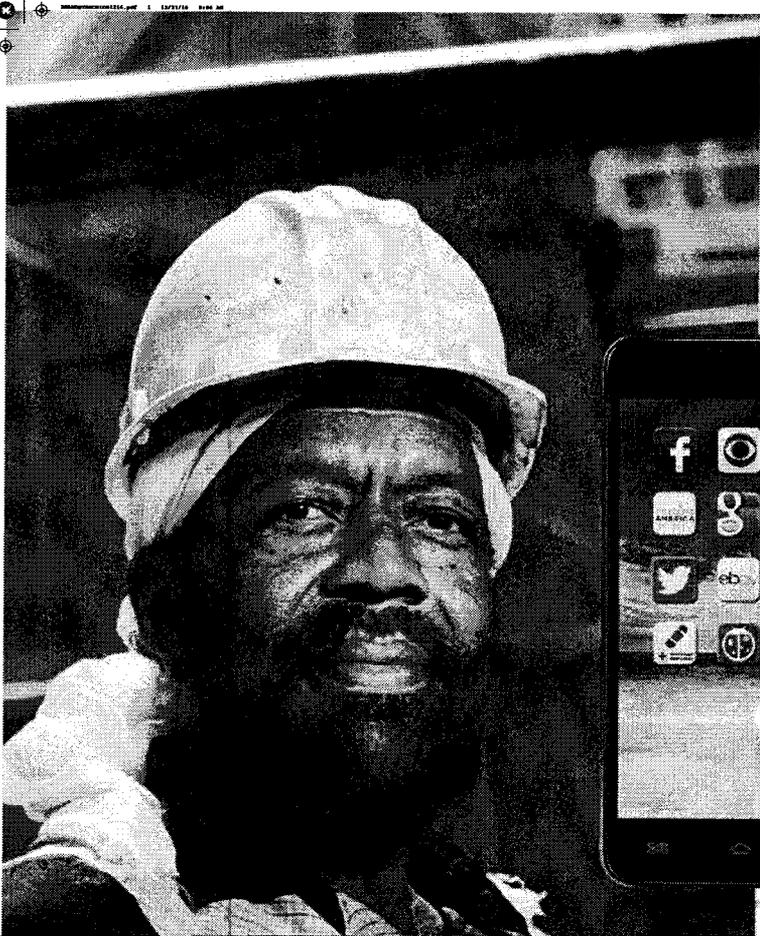
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1-888-450-1838

www.accesswireless.com



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Un teléfono gratuito es proporcionado por Access Wireless. Access Wireless es un servicio proporcionado por el Programa de Asistencia a la Línea, fundado por el gobierno. El servicio Lifeline es proporcionado por IWT Wireless, LLC, una Access Wireless, un portador de telecomunicaciones. El servicio Lifeline no es transferible. Solo un descuento Lifeline, ya sea de una línea fija o inalámbrica, puede ser recibido por hogar. El hogar es definido para los propósitos del programa Lifeline como cualquier individuo o grupo de individuos que viven en la misma dirección que el hogar y pagan los gastos. Violar la regla de uno por hogar constituye una violación de las reglas de FCC y resultará en que se le retire el programa Lifeline. Los clientes que hagan acusaciones falsas de manera deliberada para obtener algún beneficio Lifeline pueden ser castigados con una multa, encarcelamiento o ambos. Los clientes deben proporcionar los documentos correctos que confirmen su elegibilidad para el programa Lifeline. La información del cliente será verificada con records públicos y cualquier discrepancia puede resultar en retrasos en la aprobación o en el rechazo de servicio. El plan de servicio de banda ancha también está disponible e incluye 2GB de 2GB cada mes.

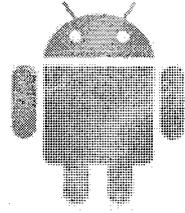


Free Smartphone

750 Minutes
Unlimited Text
50 MB of Data

OR

250 Minutes
Unlimited Text
1 GB of Data



Access to jobs.

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

Call

1-888-450-1838

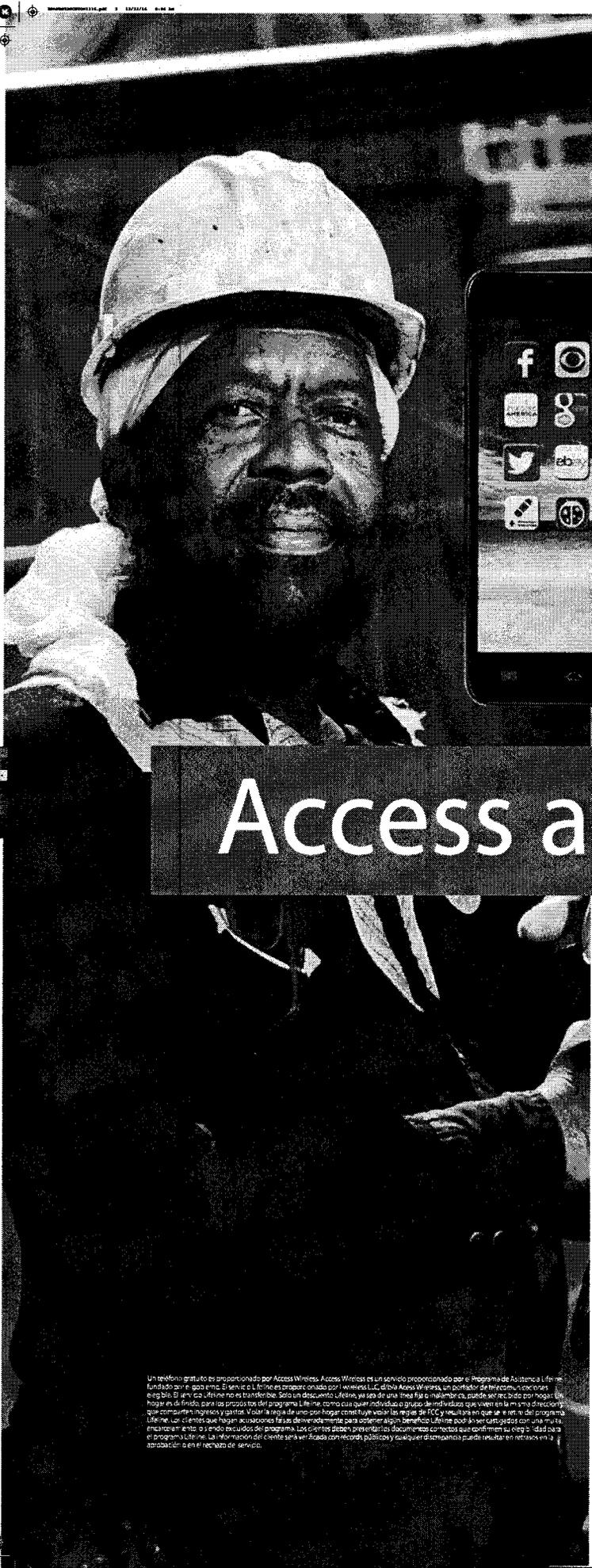
www.accesswireless.com

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BRANDSTATION/12/15

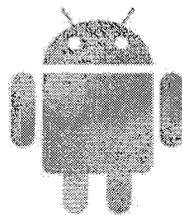


Teléfono Gratis

750 Minutos
Textos Ilimitados
50 MB de Datos

OR

250 Minutos
Textos Ilimitados
1 GB de Datos



Access a trabajos.

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

Llamada

1-888-450-1838

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Un teléfono gratuito es proporcionado por Access Wireless. Access Wireless es un servicio proporcionado por el Programa de Asistencia Lifeline fundado por el gobierno. El servicio Lifeline es proporcionado por iWireless LLC, d/b/a Access Wireless, un portador de telecomunicaciones regulado por el FCC. El servicio Lifeline no es transferible. Solo un documento Lifeline, ya sea de una línea fija o inalámbrica, puede ser recibido por hogar. Un hogar es el domicilio para los propósitos del programa Lifeline, como cualquier individuo que vive en el domicilio que vive en la misma dirección y que comparte ingresos y gastos. Violación de una regla de uno por hogar constituye violar las reglas de FCC y resultará en que se le retire el programa Lifeline, así como que haga responsable de pago de devoluciones para cualquier servicio inalámbrico que no sea proporcionado con una multa. Encienda el teléfono si está buscando el programa. Los clientes deben proporcionar documentos de identidad que confirmen la elegibilidad para el programa Lifeline. La información del cliente será verificada con registros públicos y cualquier discrepancia puede resultar en retrasos en la aprobación o en el rechazo de servicio.