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October 4, 2021

BY HAND DELIVERYAdam Teitzman, Commission Clerk
Room 152, Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850Re: Assurance Wireless USA, L.P., Lifeline Data Request, CLEC and Wireless Lifeline
Data Request 2021

Dear Mr. Teitzman:

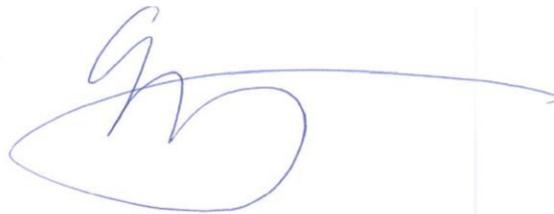
Assurance Wireless USA, L.P. (“Assurance”), pursuant to Section 364.183(1), Florida Statutes, hereby claims that the information provided in the attached CLEC and Wireless Lifeline Data Request 2021 contains confidential customer information that should be held exempt from public disclosure. Pursuant to Rule 25-22.006(5), Florida Administrative Code, the attached sealed envelope contains the documents with the confidential information.

Please acknowledge receipt of this letter by stamping the extra copy of this letter and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

BERGER SINGERMAN LLP

Floyd R. Self
Counsel for Assurance Wireless USA, L.P.FRS/am
Enclosurecc: Mr. Cayce Hinton, Director, Office of Industry Development & Market Analysis
Ms. Michelle Painter Lama, Esq.

Redacted Version for Public Inspection

Assurance Response to
CLEC AND WIRELESS LIFELINE
DATA REQUEST 2021

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Customers Participating in the Transition
Service

CLEC AND WIRELESS LIFELINE DATA REQUEST 2021

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, **please provide responses to the following questions by August 16, 2021. Your responses should include your company name, contact person, and email address.**

Please answer the following questions as they relate to your company's Florida Lifeline customers, providing data for fiscal year July 1, 2020, through June 30, 2021. For those items requesting the data be reported monthly, 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: As a wireless-only provider, Assurance Wireless does not have any "residential access lines."

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

RESPONSE: This information was included in the Lifeline Claims Worksheets previously filed.

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

RESPONSE: The Lifeline Claims Worksheets previously filed provide number of customers for each month.

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

RESPONSE: The Lifeline Claims Worksheets previously filed provide number of customers for each month.

5. 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: Yes, Assurance Wireless offers Transitional Lifeline service. The number of participating customers per month is shown in the table below. The Transitional Lifeline service is disclosed on the Assurance Wireless website under the terms of service section.

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Month/Year	# of customers participating in the transition service
07/2020	██████
08/2020	██████
09/2020	██████
10/2020	██████
11/2020	██████
12/2020	██████
01/2021	██████
02/2021	██████
03/2021	██████
04/2021	███
05/2021	██████
06/2021	██████

END CONFIDENTIAL

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

RESPONSE: This information is included in the Lifeline Claims Worksheets previously provided.

7. 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.

a. Internal procedures for promoting Lifeline.

RESPONSE: Assurance Wireless has multiple toll-free numbers as contact points for Lifeline inquiries with the ability to be transferred for Spanish language information. Specialized call center advisors have information regarding Lifeline service available.

b. Outreach and educational efforts involving participation in community events.

RESPONSE: From time to time, Assurance Wireless promotes its Assurance Wireless-branded Lifeline service at community events that are targeted to potential Lifeline eligible customers.

c. Outreach and educational efforts involving mass media (newspaper, radio, television).

RESPONSE: In addition to the Assurance Wireless website, Assurance engages in digital advertising through tactics like search engine marketing, social media, and partnerships.

d. Copies of Lifeline outreach materials of your company.

RESPONSE: In addition to our website, please see Attachment 1 for copies of Assurance Wireless outreach materials.

e. Any links on your company Web site that provides Lifeline information.

RESPONSE: Please refer to our website www.assurancewireless.com.

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: Currently, Assurance Wireless is partnering with Medicaid providers in select states. We also have partnerships with other companies that service the low-income population, such as Propel which targets customers who use SNAP.

8. 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 Lifeline service was provided through resale agreements.

9. Please identify how your company is satisfying the FCC's minimum service standards requirement.

RESPONSE: Assurance Wireless offers 1,000 voice minutes, unlimited texts and 4.5 GB of data to all new customers in Florida, along with an Android phone.

10. 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: In compliance with the federal Lifeline de-enrollment requirements, within the last year Assurance Wireless experienced a decline in Lifeline customers in the State of Florida.

11. Please identify any issues you have experienced utilizing the National Verifier.

RESPONSE: Assurance Wireless sometimes runs into issues with addresses when trying to enroll customers in the National Lifeline Accountability Database (NLAD), even though the customer was approved by the National Verifier. These are usually cases where the consumer fails because of a Duplicate Address and was not prompted by the National Verifier to complete the Independent Economic Household (IEH) worksheet.

12. Are you assisting customers with their Lifeline program applications through the National Verifier portal? If yes, please describe any issues you have experienced. If no, please describe your process for directing customers to apply with the National Verifier.

RESPONSE: Assurance Wireless continues to use field agents who assist consumers with the Lifeline application process. We have implemented the National Verifier API, which allows for a streamlined application process and better customer experience.

13. Are the majority of your new Lifeline customers already enrolled in the National Verifier before requesting Lifeline service from your company?

RESPONSE: No.

14. Since the hard launch of the National Verifier in Florida, how has your company used the customer information received from Florida's Coordinated Enrollment Process?

RESPONSE: No, Assurance Wireless does not participate in the Coordinated Enrollment Process.

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: No.

16. Within the last two years, has your company been involved in any FCC enforcement actions relating to Florida Lifeline customers? If yes, please provide the date and FCC docket number.

RESPONSE: On November 4, 2020 Assurance Wireless USA, LP ("Assurance," f/k/a Virgin Mobile USA, L.P.), Sprint Corporation, and T-Mobile US, Inc. and the Federal Communications Commission entered into a consent decree. A copy of the consent decree is publicly available at <https://docs.fcc.gov/public/attachments/DA-20-1295A1.pdf>.

17. Did you observe an increase in new Lifeline customers related to COVID-19 unemployment? Additionally, please provide or describe any form of promotion your company conducted to customers newly eligible for Lifeline due to COVID-19. Any additional general comments or information on how COVID-19 has affected your Lifeline customers in Florida are welcome.

RESPONSE: Assurance Wireless saw an increase in website visits and applications in March and in April 2020. In response to COVID-19, Assurance Wireless provided new and existing Lifeline customers added benefits from March 21, 2020 to July 6, 2020. The added benefits are as follow:

- All Lifeline customers received unlimited domestic calling, unlimited texting and an extra data (extra 6GB from March 21 – April 8 and then the data was increased to 20GB from April 9 – July 6)
- Customers with smartphone devices had the option to switch to a hotspot plan starting April 9

Additionally, the Assurance Wireless website has an FAQ relating to the impact of COVID-19:

▼ If I'm newly unemployed due to COVID-19 am I eligible for Assurance Wireless Lifeline service?

You may be eligible based on your income. You can use your Unemployment Benefit Letter as proof of eligibility through 09/30/21. It must include your name, address, effective date or end date and amount of benefit.

18. Is your company participating in the Emergency Broadband Benefit (EBB) program? If yes, are the majority of your EBB customers in Florida existing Lifeline customers?

RESPONSE: Yes. The majority of EBB customers in Florida are not existing Lifeline customers.