



August 19, 2010  
Via Overnight and Electronically

Ms. Darlene Standley  
Utilities Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

filed electronically in docket office on 08/19/10

**RE: Global Connection Inc. of America – Response to Data Request  
Docket No. 09-00187**

Dear Ms. Standley:

Enclosed please find the original and four (4) copies of a response to Staff's data request for the above-mentioned docket submitted on behalf of Global Connection Inc. of America.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope enclosed for this purpose.

Any questions you may have regarding this filing may be directed to me at 407-740-3006 or via email to [croesel@tminc.com](mailto:croesel@tminc.com).

Sincerely,

Carey Roesel  
Consultant to Global Connection Inc. of Tennessee

CR/gs  
Enclosure

file: Global Connection – TN Local  
tms: TNx0900c

**In the Matter of the Global Connection Inc. of America (GCI) Application for  
Designation of Eligible Telecommunications Carrier (ETC)  
Docket 09-00187  
Response to Tennessee Data Request – 8/19/2010**

2. List all exchange service areas by name, rather than by Company Language Location Identifier (CLLI) as provided in Appendix B of GCI's petition, for which GCI is requesting ETC designation.

*Please see **Exhibit A** for a list of all exchange service names for which Global is requesting ETC designation.*

3. Indicate the Tennessee exchanges in which GCI is currently providing facilities based services using its own facilities and/or a combination of resale and UNEs. Identify the rate centers where service is being provided through resale only.

*Please see **Exhibit B** for a list of exchanges in which Global is currently providing facilities-based services using our own soft switch facility and/or a combination of resale and UNEs. As all Global customers are provided three of the nine services supported by federal universal support mechanisms using Global's facilities, there are no rate centers where services are provided through resale only.*

4. Please identify the additional telecommunication services offered by GCI, alluded to in paragraph 4 of the petition.

*In addition to local exchange services, Global currently offers domestic and international long distance services and prepaid dial up internet connection.*

5. Provide the TRA Docket number for GCI's Interconnection Agreement (s) that provides GCI's leasing of UNEs.

*Global was able to identify the following TN docket numbers pertaining to our interconnection agreements:*

*03-00282, 04-00076, and 08-00158*

6. Provide a copy of GCI's Application to be used by Lifeline Applicants. Also describe the annual re-verification process for Lifeline customers.

*Global Connection requires lifeline applicants to complete the attached form (**Exhibit C**) designating their eligibility to participate in the program. Global's proprietary customer management system provides reporting capability for customers approaching the anniversary of their lifeline enrollment. Systems are in place to generate mailing lists for customers requiring annual re-verification of eligibility, and verification forms are sent to each customer. In addition, our compliance group maintains records of each document and can access customers requiring re-verification.*

7. Identify and provide copies of Global Connection Inc. of America's current advertisements clearly showing Lifeline services, discounts, and connection fees. Include newsprint, fliers, posters, etc., and provide plans detailing how and where the advertisements are distributed to Tennesseans, especially to those most likely to qualify for lifeline services.

*Global maintains a significant advertising presence via TV advertising, print media, agent networks, and payment center agreements. Advertising saturation, media, and specific ad distribution is dependent on several factors. ETC designation is a key factor in determining ad market saturation and media type. Currently, Global Connection has focused our television advertising solely in our ETC markets and plans to expand our TV advertising footprint as we gain additional certifications.*

*Global maintains an extensive network of payment centers and agent relationships throughout our service areas. In TN, our relationship with the Kroger grocery store chain allows point of sale merchandising in each of their 128 in state locations. Customers can receive information, order service, and make payments at the customer service desk in each Kroger location providing significant marketing presence to a core customer base. Global also has approximately 45 independent agents offering our services and providing customers convenient payment locations.*

*Copies of advertising used in various markets is attached for reference (see **Exhibit D**), however it should be noted that some ads are area specific and content may be adjusted as needed by the market.*

8. For the last USF payment period, provide the total amount contributed to the fund by Global Connection Inc. of America as stated in paragraph 27 of GCI's petition.

*For the last USF payment period, Global Connection contributed \$8,970.15 to the fund. A copy of our USAC invoice is attached for verification purposes (**Exhibit E**).*

9. In the petition 12 (f) states, "An ETC shall certify that the carrier acknowledges that the FCC may require it to provide equal access to long distance carriers if all other ETCs withdraw from the market." Provide Global Connection's process for providing equal access for long distance service.

*In the event that all ETCs withdraw from the market and the FCC required Global to provide equal access to long distance carriers, Global acknowledges it would need to do so. Lifeline customers that chose free Toll Blocking would continue to be provisioned in that fashion and by their own choice would not have 1+ dialing on their lines, but would have access to Global's long distance network via Global Local DID's if they chose to subscribe to it. Customers that chose to forgo the free Toll Blocking could do so and choose an Interexchange Carrier for 1+ long distance. Global would require that the customer demonstrate that they have direct billing arrangements with that carrier. Global would also require a security deposit to insure against post paid long distance calls getting billed to Global. Global would then PIC their line to the CIC code of their choice.*

10. The Petition explains Global Connection Inc. of America's plans for ensuring its customers continue receiving telecommunications services should AT&T- Tennessee relinquish a particular service area that results in Global Connection Inc. of America assuming the Carrier of Last Resort obligations referred to in paragraph 13 of the ETC Application. Provide a detailed explanation of how Global Connection would be able to assume carrier of last resort obligations in the service area in the situation where AT&T directly relinquishes its service area.

*Global would provision all new customers and re-provision any existing customers on a resale platform to the Unbundled Network Element Platform. In addition, Global's soft switch platform can be enabled to provide Local Exchange Services using Voice over Internet Protocol technology.*

11. Please explain and clarify how the following statements relate to wireline telecommunications local service in paragraph (13):
- "network" already passes or covers the" ....customer's premise..." as to how this relates to wireline local services and service area.
  - Describe the meaning of the term "outside...existing network coverage..." as it relates to CLEC authorized local service area.
  - Explain the relationship of its CLEC authorized local service area and services which modifying or replacing.....customer' equipment; "deploying a roof-mounted antenna"; 'adjusting network or customer facilities."
  - "Network that already passes or covers the customer's premise" are customer addresses where Global is able to order resold dial tone or UNE-P from AT&T, CenturyTel or Frontier.
  - "Outside existing network coverage" are customer addresses where Global is not able to order resold dial tone or UNE-P from AT&T, CenturyTel or Frontier.
  - Providing services within the authorized CLEC area but outside existing network coverage are customer addresses in Global's designated area, where Global is not able to order resold dial tone or UNE-P from AT&T, CenturyTel or Frontier; and customer requests service, Global will provide service in a reasonable time if it can be provided at a reasonable cost.
12. Provide the Tennessee location and type of GCI's back-up power referred to in paragraph 15 of the petition.

*Six of the nine services that are supported by federal universal support mechanisms are backed up by power facilities in TN that are owned and operated by AT&T, CenturyTel, and Frontier and are available to Global via resale and UNE-P interconnection agreements. Three of the nine supported services are provided on Global's own soft switch collocated in Atlanta and Tampa data facilities operated by Sago Networks. Each of these data centers are served via dual power grids, battery backups and multiple diesel generators. Please see response to #16 below for further clarification.*

13. Provide the Tennessee location where GCI's network is monitored, where its technicians are based, and where spare parts are stored referred to in paragraph 16 of the petition.

*The six supported services obtained from AT&T, CenturyTel and Frontier through resale or UNE-P are monitored by their respective companies' technicians. They also stock spare parts for the facilities that provide those services. The three supported services delivered on Global's facilities are monitored by Global employees. Global has personnel in Georgia and Florida that monitors and troubleshoots the soft switch 24/7/365. All systems are physically and geographically redundant and load balanced. They are collocated in highly secure and redundant facilities. Please see response to #16 below for further clarification.*

14. Please provide details about GCI's customer care programs stores referred to in paragraph 17 of the petition.

*Global operates a 60-seat call center in Norcross, GA with full service customer support available from 8:30 AM to 9:00 PM M-F and 10 AM to 2:00 PM on Saturdays. Global provides technical assistance, maintenance scheduling, billing assistance, payment processing, and general customer service are available by reaching out to our call center. Global's payment center and agent network provides convenient payment processing at Kroger locations and 45 independent agents in TN. Each of Global's customers also receives automatic, no-charge participation in our GlobalCares program, a discount prescription drug plan accepted at over 50,000 pharmacies nationwide (**Exhibit F**).*

15. Describe procedures Global Connection Inc. of America's has in place for reporting to the Universal Service Administration Company, with appropriate examples (copies of reports).

*Global submits monthly form 497 filings to USAC for Lifeline and Link Up reimbursements. Line count information is available via reporting from our customer management system. Multiple checks are in place to ensure proper line provisioning and appropriate submissions to USAC. I have attached form 497 submissions (**Exhibit G**) completed for current ETC certified states as an example of our filings.*

16. Describe Global Connection Inc. of America's method of provisioning access and/or how local service switching is obtained. If local switching is obtained from another carrier by lease, please describe Global Connection Inc.'s plans for transition to its own switch facilities and the switch type GCI is planning to deploy as stated in paragraph 4 of its petition.

*Please find attached Section 12.2 of our current commercial agreement with AT&T which references our status as a facilities-based carrier (**Exhibit H**). Furthermore, our interpretation of 47 C.F.R. §54.101 copied below confirms our switch deployment meets the guidelines for consideration as facilities based:*

*FCC requirements established under of 47 C.F.R. § 54.101 outlines the nine services supported by federal universal service support mechanisms;*

- 1. Voice grade access to the public switched network*
- 2. Local Usage*
- 3. DTMF*
- 4. Single Party Service*
- 5. Access to Emergency Services*
- 6. Access to operator services*
- 7. Access to an interexchange service*
- 8. Access to directory assistance*
- 9. Toll-limitation for qualifying low-income consumers*

*Global uses its own soft switch to deliver 6, 7, and 8 above. Global uses a combination of resale and UNE facilities to deliver 1, 2, 3, 4, 5, and 9 above. By doing so, Global meets the litmus test for ETC eligibility as outlined in 47 U.S.C. §214 (e) (I) which states "Eligible telecommunications carriers - A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received - (A) offer the services that are supported by federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier)."*

Furthermore, Global's soft switch can be used as proof of its own facilities to provide services to lifeline customers as **47 C.F.R. §54.201 in part states (bold for emphasis):**

(e) For the purposes of this section, the term **facilities means any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part.**

(f) For the purposes of this section, the term **own facilities includes, but is not limited to, facilities obtained as unbundled network elements pursuant to part 51 of this chapter, provided that such facilities meet the definition of the term facilities under this subpart.**

(g) **A state commission shall not require a common carrier, in order to satisfy the requirements of paragraph (d)(1) of this section, to use facilities that are located within the relevant service area, as long as the carrier uses facilities to provide the services designated for support pursuant to subpart B of this part within the service area.**

(h) **A state commission shall designate a common carrier that meets the requirements of this section as an eligible telecommunications carrier irrespective of the technology used by such carrier.**

Global provides three of the nine supported services on its own soft switching facilities. The soft switch consists of highly scalable server stacks, running open source operating systems and proprietary service architecture supporting SIP origination and termination in addition to TDM interfaces to the PSTN. They are physically and geographically redundant and load balanced. They are collocated in highly secure and redundant facilities.

The server stacks run a MySQL database that grants permissions to end users. Global operates a national network of local DID's that allow an end user to place a free local call into the nationwide Global network. All of those DID's terminate via an IP (Internet Protocol) hand off to redundant servers in the stack that run an Asterisk based solution. Those same Asterisk based servers originate interexchange calls on an end user's behalf using an IP handoff to several domestic and international wholesale long haul providers. The Asterisk servers in the cluster also enable IP handoffs for end users to a free directory assistance service and direct free handoffs to Global's owned and operated Call Center in Norcross, GA for operator services and customer care. Global designed, built, and deployed the soft switch. Global will continue to invest in its network architecture to provide additional advanced cost effective services for its customers.

The Atlanta switch is collocated in a data center operated by Sago Networks. The address of that facility is: 4311 Communications Drive, Norcross GA 30093. Global also operates disaster recovery network servers collocated in a data center also operated by Sago Networks in Tampa. The address of that facility is: 4465 W. Gandy Blvd., Suite 800 Tampa FL 33611. Each of these facilities provide; security, multiple layers of backup power, climate control, fire suppression, 24/7/365 always available personal support, and access to a highly scalable 10 Gigabit fiber optic transport solution from Atlanta to Miami to Tampa with over 15 additional POPs throughout Georgia and Florida.

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT A**

**List of Exchange Service Areas**

<u>CLLI</u>	<u>LEC</u>	<u>ST</u>	<u>Loc</u>
ACHLTNMTRS0	AT&T Areas	TN	ADMSCDARHL
ARTNTNMTRS0	AT&T Areas	TN	ARLINGTON
ASCYTNMADS0	AT&T Areas	TN	ASHLAND CY
ATHNTNMADS0	AT&T Areas	TN	ATHENS
BGSNTNMARS0	AT&T Areas	TN	BIG SANDY
BLGPTNMARS0	AT&T Areas	TN	BULLS GAP
BLLSTNMARS0	AT&T Areas	TN	BELLS
BLNCTNMTRS5	AT&T Areas	TN	BLANCHE
BLVRTNMADS0	AT&T Areas	TN	BOLIVAR
BLVRTNMADS1	AT&T Areas	TN	BOLIVAR
BNTNTNMTRS0	AT&T Areas	TN	BENTON
BTSPNTMARS0	AT&T Areas	TN	BETHEL SPG
BWVLTNMADS1	AT&T Areas	TN	BROWNSVL
CHRLTNMTDS0	AT&T Areas	TN	CHARLOTTE
CHTGTNBRDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNDTDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNHTDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNMVDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNNS84T	AT&T Areas	TN	CHATTNOOGA
CHTGTNNSDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNNSDS1	AT&T Areas	TN	CHATTNOOGA
CHTGTNRBDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNRODS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNSEDS0	AT&T Areas	TN	CHATTNOOGA
CHTGTNSMRS0	AT&T Areas	TN	CHATTNOOGA
CHTNTNMTRS0	AT&T Areas	TN	CHARLESTON
CLDGTMADS1	AT&T Areas	TN	CUMBERLDGP
CLEVTNMADS0	AT&T Areas	TN	GEORGETOWN
CLMATNMADS0	AT&T Areas	TN	COLUMBIA
CLTNTNMADS0	AT&T Areas	TN	CLINTON
CLVLTNMADS0	AT&T Areas	TN	CLARKSVL
CMCYTNMTRS5	AT&T Areas	TN	CUMBERLDCY
CMDNTNMADS0	AT&T Areas	TN	CAMDEN
CNHMTNMARS5	AT&T Areas	TN	SCUNNINGHA
CNVLTNMARS0	AT&T Areas	TN	CENTERVL
CRHLTNCBRS0	AT&T Areas	TN	COPPERBSIN
CRNTMSMADS2	AT&T Areas	MS	MICHIE
CRPLTNMARS0	AT&T Areas	TN	CRSPLORLND
CRHTNMARS5	AT&T Areas	TN	CARTHAGE
CRVLTNMADS0	AT&T Areas	TN	COLLIERVL
CULKTNMARS5	AT&T Areas	TN	CULLEOKA
CVTNTNMTDSD1	AT&T Areas	TN	COVINGTON
DCTRTNMTRS5	AT&T Areas	TN	DECATUR
DKSNTNMTDSD0	AT&T Areas	TN	DICKSON



DNRGTNMADSO	AT&T Areas	TN	DANDRIDGE
DOVRTNMTRS5	AT&T Areas	TN	DOVER
DYBGTNMADSO	AT&T Areas	TN	DYERSBURG
DYERTNMTRS0	AT&T Areas	TN	DYER
DYTNTNMADSO	AT&T Areas	TN	DAYTON
EAVLTNMARS5	AT&T Areas	TN	EAGLEVILLE
ETWHTNMTRS0	AT&T Areas	TN	ETOWAH
FIVLTNMARS5	AT&T Areas	TN	FRIENDSVL
FKLNTNCCRS5	AT&T Areas	TN	FRANKLIN
FKLNTNMADSO	AT&T Areas	TN	FRANKLIN
FLTNTKYMADSO	AT&T Areas	KY	SO FULTON
FLVLTNMARS5	AT&T Areas	TN	FLINTVILLE
FRDNTNMARS5	AT&T Areas	TN	SOFREDONIA
FRVWTNMTRS5	AT&T Areas	TN	FAIRVIEW
FYVLTNMADSO	AT&T Areas	TN	FAYETTEVL
GALLTNMADSO	AT&T Areas	TN	GALLATIN
GBSNTNMTRS0	AT&T Areas	TN	GIBSON
GDJTTNMARS0	AT&T Areas	TN	GRAND JCT
GDVLTNMARS0	AT&T Areas	TN	GOODLETSVL
GLSNTNMARS0	AT&T Areas	TN	GLEASON
GNBRTNMARS5	AT&T Areas	TN	GREENBRIER
GNFDTNMTDSD0	AT&T Areas	TN	GREENFIELD
GRNBTNMARS5	AT&T Areas	TN	GREENBACK
GTBGTNMTDSD0	AT&T Areas	TN	GATLINBURG
GTHRKYMADSO	AT&T Areas	KY	SO GUTHRIE
GTWSTNSWRS5	AT&T Areas	TN	MEMPHIS
HDVLTNMADSO	AT&T Areas	TN	HENDERSNVL
HHNWTNMARS5	AT&T Areas	TN	HOHENWALD
HIMNTNMADSO	AT&T Areas	TN	HARRIMAN
HLLSTNMTRS5	AT&T Areas	TN	HALLS
HMBLTNMADS1	AT&T Areas	TN	HUMBOLDT
HMPSTNMARS5	AT&T Areas	TN	HAMPSHIRE
HNLDTNMADSO	AT&T Areas	TN	HUNT LAND
HNNGTNMARS5	AT&T Areas	TN	HENNING
HNSNTNMTRS0	AT&T Areas	TN	HENDERSON
HNTGTNMADSO	AT&T Areas	TN	HUNTINGDON
HRFRTNMARS0	AT&T Areas	TN	HARTFORD
HRNBTNMTRS5	AT&T Areas	TN	HORNBEAK
HTVLTNMARS5	AT&T Areas	TN	HARTSVILLE
JCSNTNMADSO	AT&T Areas	TN	JACKSON
JCSNTNNSDS0	AT&T Areas	TN	JACKSON
JFCYTNMADS1	AT&T Areas	TN	JEFFERSNCY
JLLCTNMARS0	AT&T Areas	TN	JELICO
JSPRTNMTDSD0	AT&T Areas	TN	JASPER
KGTNTNMTDSD0	AT&T Areas	TN	KINGSTON
KNTNTNMARS5	AT&T Areas	TN	KENTON
KNVLTNBEDSO	AT&T Areas	TN	KNOXVILLE

KNVLTNFCDS0	AT&T Areas	TN	KNOXVILLE
KNVLTNMA84T	AT&T Areas	TN	KNOXVILLE
KNVLTNMADS0	AT&T Areas	TN	KNOXVILLE
KNVLTNMADS1	AT&T Areas	TN	KNOXVILLE
KNVLTNWHDS0	AT&T Areas	TN	KNOXVILLE
KNVLTNYHDS0	AT&T Areas	TN	KNOXVILLE
LBNNTNMADS0	AT&T Areas	TN	LEBANON
LFLTNTMADS0	AT&T Areas	TN	LAFOLLETTE
LKCYTNMADS0	AT&T Areas	TN	LAKE CITY
LNCYTNMADS0	AT&T Areas	TN	LENOIRCITY
LODNTNMARS5	AT&T Areas	TN	LOUDON
LRBGTNMADS0	AT&T Areas	TN	LAWRENCEBG
LWBGTNMADS0	AT&T Areas	TN	LEWISBURG
LXTNTNMADS1	AT&T Areas	TN	LEXINGTON
LYBGTNMTRS0	AT&T Areas	TN	LYNCHBURG
LYLSTNMARS0	AT&T Areas	TN	SPENCERMIL
LYVLTNMARS5	AT&T Areas	TN	LYNNVILLE
MAVLTNMADS0	AT&T Areas	TN	MARYVILLE
MCKNTNMARS0	AT&T Areas	TN	MCKENZIE
MCWNTNMTRS5	AT&T Areas	TN	MCEWEN
MDBOKYMADS1	AT&T Areas	KY	FORK RIDGE
MDTNTNMADS0	AT&T Areas	TN	MIDDLETON
MDVITNMTDS0	AT&T Areas	TN	MADISONVL
MEDNTNMADS0	AT&T Areas	TN	MEDINA
MILNTNMARS0	AT&T Areas	TN	MILAN
MMPHTNBADS0	AT&T Areas	TN	MEMPHIS
MMPHTNCKDS0	AT&T Areas	TN	MEMPHIS
MMPHTNCTDS0	AT&T Areas	TN	MEMPHIS
MMPHTNELDS0	AT&T Areas	TN	MEMPHIS
MMPHTNFRDS0	AT&T Areas	TN	MEMPHIS
MMPHTNGTDS0	AT&T Areas	TN	MEMPHIS
MMPHTNHPRS5	AT&T Areas	TN	MEMPHIS
MMPHTNMA84T	AT&T Areas	TN	MEMPHIS
MMPHTNMADS0	AT&T Areas	TN	MEMPHIS
MMPHTNMADS1	AT&T Areas	TN	MEMPHIS
MMPHTNMTDS0	AT&T Areas	TN	MEMPHIS
MMPHTNOADS1	AT&T Areas	TN	MEMPHIS
MMPHTNSLDS0	AT&T Areas	TN	MEMPHIS
MMPHTNSTDS0	AT&T Areas	TN	MEMPHIS
MMPHTNWWRS0	AT&T Areas	TN	MEMPHIS
MNCHTNMADS0	AT&T Areas	TN	MANCHESTER
MNPLTNMARS5	AT&T Areas	TN	MTPLEASANT
MRBOTNMADS0	AT&T Areas	TN	MURFREESBO
MRTWTNMADS0	AT&T Areas	TN	MORRISTOWN
MSCTTNMTDS0	AT&T Areas	TN	MASCOT
MSCWTNMARS0	AT&T Areas	TN	MOSCOW
MYVLTNMARS0	AT&T Areas	TN	MAYNARDVL

NRRSTNMARS0	AT&T Areas	TN	NORRIS
NSVLTNAARS5	AT&T Areas	TN	NASHVILLE
NSVLTNAPDS0	AT&T Areas	TN	NASHVILLE
NSVLTNBHRS5	AT&T Areas	TN	NASHVILLE
NSVLTNBVDS0	AT&T Areas	TN	NASHVILLE
NSVLTNBWDS0	AT&T Areas	TN	NASHVILLE
NSVLTNCDRS5	AT&T Areas	TN	NASHVILLE
NSVLTNCHDS0	AT&T Areas	TN	NASHVILLE
NSVLTNDODS0	AT&T Areas	TN	NASHVILLE
NSVLTNHHR5	AT&T Areas	TN	NASHVILLE
NSVLTNINCG0	AT&T Areas	TN	NASHVILLE
NSVLTNMCDS0	AT&T Areas	TN	NASHVILLE
NSVLTNMT84T	AT&T Areas	TN	NASHVILLE
NSVLTNMT86T	AT&T Areas	TN	NASHVILLE
NSVLTNMTDS0	AT&T Areas	TN	NASHVILLE
NSVLTNMTDS1	AT&T Areas	TN	NASHVILLE
NSVLTNMTDS3	AT&T Areas	TN	NASHVILLE
NSVLTNSTDS0	AT&T Areas	TN	NASHVILLE
NSVLTNUNDS0	AT&T Areas	TN	NASHVILLE
NSVLTNWCDS0	AT&T Areas	TN	NASHVILLE
NSVLTNWMDS0	AT&T Areas	TN	NASHVILLE
NWBRTNMARS5	AT&T Areas	TN	NEWBERN
NWPTTNMTDS0	AT&T Areas	TN	NEWPORT
OKGVKYESDS0	AT&T Areas	KY	SOOAKGROVE
OKRGTNMTDS0	AT&T Areas	TN	OAK RIDGE
OLHCTNMARS5	AT&T Areas	TN	OLDHICKORY
OLSPTNMARS0	AT&T Areas	TN	OLIVER SPG
PARSTNMADS1	AT&T Areas	TN	PARIS
PLMYTNMARS5	AT&T Areas	TN	PALMYRA
PLSKTNMADS0	AT&T Areas	TN	PULASKI
PSVWTNMTRS0	AT&T Areas	TN	PLEASANTVW
PTBGTNMARS0	AT&T Areas	TN	PETERSBURG
PTLDTNMARS5	AT&T Areas	TN	PORTLAND
RDGLTNMARS5	AT&T Areas	TN	RIDGELY
RKWDTNMADS0	AT&T Areas	TN	ROCKWOOD
RPLYTNMADS0	AT&T Areas	TN	RIPLEY
RRVLTNMADS0	AT&T Areas	TN	ROGERSVL
SANGTNMTRS5	AT&T Areas	TN	EASTSANGO
SDDSTNMARS5	AT&T Areas	TN	SODDYDAISY
SEWNTNMWDS0	AT&T Areas	TN	SEWANEE
SHVLTNMADS0	AT&T Areas	TN	SHELBYVL
SLMRTNMTDS0	AT&T Areas	TN	SELMER
SMTWTNMARS5	AT&T Areas	TN	SUMMERTOWN
SMYRTNMADS0	AT&T Areas	TN	SMYRNA
SNTFTNMARS5	AT&T Areas	TN	SANTA FE
SNVLTNMARS0	AT&T Areas	TN	SNEEDVILLE
SOVLTNMTDS0	AT&T Areas	TN	SOMERVILLE

SPBGTNMARSO	AT&T Areas	TN	SO PITTSBG
SPCYTNMTRSO	AT&T Areas	TN	SPRINGCITY
SPFDTNMADSO	AT&T Areas	TN	SPRINGFLD
SPHLTNMTRSO	AT&T Areas	TN	NSPRINGHIL
SRVLTNMADSO	AT&T Areas	TN	SURGOINSVL
SVNHTNMTDSO	AT&T Areas	TN	SAVANNAH
SVVLTNMTDSO	AT&T Areas	TN	SEVIERVL
SWTWTNMTRSO	AT&T Areas	TN	SWEETWATER
TLLHTNMADSO	AT&T Areas	TN	TULLAHOMA
TPVLTNMARSO	AT&T Areas	TN	TIPTONVL
TRINTNMARS5	AT&T Areas	TN	TRIUNE
TROYTNMTRS5	AT&T Areas	TN	TROY
TRTNTNMADSO	AT&T Areas	TN	TRENTON
TWNSTNMARS5	AT&T Areas	TN	TOWNSEND
UNCYTNMADSO	AT&T Areas	TN	UNION CITY
VNLRTNMARS5	AT&T Areas	TN	VANLEER
WHBLTNMTDSO	AT&T Areas	TN	WHITEBLUFF
WHHSTNMARSO	AT&T Areas	TN	WHITEHOUSE
WHPITNMADSO	AT&T Areas	TN	WHITE PINE
WHVLTNMTRSO	AT&T Areas	TN	WHITEVILLE
WHWLTNMARSO	AT&T Areas	TN	WHITWELL
WLPTTNMARSO	AT&T Areas	TN	WILLIAMSPT
WNCHTNMADSO	AT&T Areas	TN	WINCHESTER
WRTRTNMTRS5	AT&T Areas	TN	WARTRACE
WTTWTNMARS5	AT&T Areas	TN	WATERTOWN
WVRLTNMTRS5	AT&T Areas	TN	WAVERLY
ADVLTNXADS1	CenturyTel Areas	TN	ADAMSVILLE
MDVLTNXADS0	CenturyTel Areas	TN	MILLEDGEVL
SHLHTNXADS0	CenturyTel Areas	TN	SHILOH
NWTZTNXADS1	CenturyTel Areas	TN	NEWTAZWELL
SHCPTNXARS5	CenturyTel Areas	TN	SHARPSCHPL
APSNTNXARS5	CenturyTel Areas	TN	APISON
CLDLTNXARS5	CenturyTel Areas	TN	COLLEGEDL
OLTWTNXADS1	CenturyTel Areas	TN	OOLTEWAH
CHTGTN78DSO	CenturyTel Areas	TN	CHATTNOOGA
ALGDTNXARSO	Frontier Areas	TN	ALGOOD
CKVLTNXADS0	Frontier Areas	TN	COOKEVILLE
CSVLTNXADS0	Frontier Areas	TN	CROSSVILLE
DRSDTNXADS0	Frontier Areas	TN	DRESDEN
LTHMTNXARSO	Frontier Areas	TN	LATHAM
MARTTNXADS0	Frontier Areas	TN	MARTIN
MMVLTNXADS0	Frontier Areas	TN	MCMINNVL
MTRYTNXARSO	Frontier Areas	TN	MONTEREY
PLHLTNXARSO	Frontier Areas	TN	PLEASANTHL
PLVLTNXARSO	Frontier Areas	TN	PALMERSVL
SHRNTNXADS0	Frontier Areas	TN	SHARON
SIDNTNXARSO	Frontier Areas	TN	SIDONIA

SPRTTNXARSO	Frontier Areas	TN	SPARTA
TANSTNXARSO	Frontier Areas	TN	TANSI
CXTNTNXARSO	Frontier Areas	TN	CLAXTON
POWLTXADS0	Frontier Areas	TN	POWELL
RTLGTNXADS1	Frontier Areas	TN	RUTLEDGE
TTSPTNXARSO	Frontier Areas	TN	TATE SPG
WSBNTNXARSO	Frontier Areas	TN	WASHBURN

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT B**

**Active Exchanges for Combination of Resale and UNE-P**

Active exchanges for combination of Resale & UNEP  
12-Aug-10

ALCOA  
ANDERSONVILLE  
ANTIOCH  
APISON  
ARLINGTON  
ASHLAND CITY  
ATHENS  
BARTLETT  
BELLS  
BELVIDERE  
BIG ROCK  
BIRCHWOOD  
BLAINE  
BOLIVAR  
BON AQUA  
BRICEVILLE  
BRIGHTON  
BROWNSVILLE  
BURLISON  
BYBEE  
CAMDEN  
CARTHAGE  
CARYVILLE  
CEDAR HILL  
CENTERVILLE  
CHAPMANSBORO  
CHARLESTON  
CHARLOTTE  
CHATTANOOGA  
CLAIRFIELD  
CLARKSVILLE  
CLEVELAND  
CLINTON  
COLLIERVILLE  
COLUMBIA  
CORDOVA  
CORRYTON  
COSBY  
COTTONTOWN  
COVINGTON  
CROSS PLAINS  
CUMBERLAND FURNACE  
CUMBERLAND GAP  
DANDRIDGE  
DAYTON  
DECHERD  
DEL RIO  
DELANO  
DENMARK  
DICKSON  
DOVER  
DYERSBURG

EADS  
EAGLEVILLE  
EAST RIDGE  
ELORA  
ESTILL SPRINGS  
ETHRIDGE  
ETOWAH  
EVENSVILLE  
FAIRVIEW  
FAYETTEVILLE  
FRANKLIN  
FRIENDSVILLE  
GALLATIN  
GALLAWAY  
GATLINBURG  
GOODLETTSVILLE  
GOODSPRING  
GRAND JUNCTION  
GRAYSVILLE  
GREENBACK  
GREENBRIER  
HALLS  
HARRIMAN  
HARRISON  
HARROGATE  
HEISKELL  
HENDERSONVILLE  
HERMITAGE  
HICKORY HILL  
HICKORY VALLEY  
HIXSON  
HOHENWALD  
HUMBOLDT  
HUNTLAND  
INDIAN MOUND  
JACKSBORO  
JACKSON  
JEFFERSON CITY  
JOELTON  
KELSO  
KIMBERLIN HEIGHTS CPO  
KINGSTON  
KNOXVILLE  
KODAK  
LA VERGNE  
LAFOLLETTE  
LAWRENCEBURG  
LEBANON  
LENOIR CITY  
LEOMA  
LEWISBURG  
LEXINGTON  
LOUDON  
LOUISVILLE  
LUTTRELL



LYLES  
MADISON  
MADISONVILLE  
MANCHESTER  
MARYVILLE  
MASCOT  
MASON  
MAYNARDVILLE  
MC EWEN  
MCEWEN  
MCKENZIE  
MEMPHIS  
MIDDLETON  
MORRISON  
MORRISTOWN  
MOSCOW  
MOUNT PLEASANT  
MT JULIET  
MT PLEASANT  
MUEFREESBORO  
MUFREESBORO  
MULBERRY  
MURFREESBORO  
NASHVILLE  
NEW MARKET  
NEWBERN  
NEWPORT  
NORMANDY  
NUNNELLY  
OAK RIDGE  
OAKFIELD  
OAKLAND  
OLIVER SPRINGS  
OOLTEWAH  
PARIS  
PARROTTSVILLE  
PETERSBURG  
PHILADELPHIA  
PIGEON FORGE  
PIPERTON  
PLEASANT VIEW  
PORTLAND  
POWDER SPRINGS  
PULASKI  
RAMER  
RIPLEY  
ROCKFORD  
ROCKVALE  
ROCKWOOD  
ROSSVILLE  
SALE CREEK  
SALTILLO  
SANTA FE  
SAULSBURY  
SAVANNAH

Seveirville  
SEVIERVILLE  
SEYMOUR  
SHELBYVILLE  
SHERWOOD  
SIGNAL MOUNTAIN  
SMYRNA  
SODDY DAISY  
SODDY-DAISY  
SOMERVILLE  
SOUTH PITTSBURG  
SPEEDWELL  
SPRING CITY  
SPRINGFIELD  
STRAW PLAINS  
STRAWBERRY PLAINS  
SWEETWATER  
TAZEWELL  
TEN MILE  
THOMPSONS STATION  
THOMPSONS STN  
TIPTONVILLE  
TOWNSEND  
TRENTON  
TULLAHOMA  
UNION CITY  
VANLEER  
WALLAND  
WATERTOWN  
WAVERLY  
WEST POINT  
WHITE BLUFF  
WHITE HOUSE  
WHITEVILLE  
WHITWELL  
WILDERSVILLE  
WILLIAMSPORT  
WINCHESTER  
WOODLAWN

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT C**

**Lifeline Application**

# Lifeline/Link-Up Program<sup>1</sup>

Name

Address

City, State, Zip

Telephone Number

Account Number

**In order to receive the Lifeline/Link-Up discounts, you must certify that you receive benefits from one or more of the following programs. (In Illinois ONLY - you must also submit a copy of a dated document which verifies your participation in one or more of the following programs). If you do not certify your, or a household member's, enrollment in one of the participating programs, you will NOT receive any Lifeline discounts and your monthly telephone service will be billed at the standard rate.**

(Check all that apply)

- ☐ Medicaid
- ☐ Food Stamps/Supplemental Nutrition Assistance Program (SNAP)
- ☐ Supplemental Security Income (SSI)
- ☐ Federal Public Housing Assistance (FPHA)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Free National School Lunch Program

**I understand that my enrollment in Lifeline will not begin until I have signed and returned this application, AND have provided Global Connection with a dated document that verifies my, or someone in my household's, enrollment in one of the programs listed above. These forms must be mailed or faxed to the address or fax number listed below.**

By signing this application, I certify, under penalty of perjury, that I participate in one or more of the above referenced programs. I also certify that I, nor any member of my household, currently receive a Lifeline discount from any other carrier (wireline or wireless) and that I, nor any member of my household, have received a Link-Up credit at the address listed above. I agree that I will contact Global Connection when I am no longer eligible to participate in the program or when my participation ends, whichever occurs sooner. This signed application gives Global Connection your authorization to access state and/or federal agency records to confirm your eligibility as indicated above.

Applicant Signature: \_\_\_\_\_

Date: \_\_\_\_\_

SSN: \_\_\_\_\_

Age: \_\_\_\_\_

Public Aid Case # (In IL Only): \_\_\_\_\_

**NOTE:** The name on the telephone service **MUST** match the name of the household member that is currently participating in one of the programs listed above.  
- This signed Application is valid for one year or whenever your participation in an eligible program ends, whichever occurs soonest.

<sup>1</sup> In Illinois, the Lifeline Program is named Universal Telephone Service Assistance Program ("UTSAP")  
In Missouri, the Lifeline Program is named Missouri Universal Service Fund Program ("MoUSF")

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT D**

**Marketing Samples**



# GOVERNMENT DISCOUNTED

## Real HOME PHONE SERVICE™



- ✓ No Credit Check
- ✓ No Contract
- ✓ No Deposit

FOR A  
LIMITED  
TIME!!

# FREE FIRST MONTH

\*FREE ACTIVATION for Lifeline customers only. See back for details.

**1-877-283-3888**

*Hablamos Español*

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

K-GA-2K10-Q3

## The government can help you pay your phone bill!

- ✓ Save \$13.50 per month (\$162/yr)
- ✓ Save \$60 on activation
- ✓ Unlimited local calls
- ✓ Safe 911 connection



Pricing for **AT&T** Service Areas - Georgia.

FOR A  
LIMITED  
TIME!!

# FREE\* FIRST MONTH

\*FREE ACTIVATION for Lifeline customers only.

### Pick Your Prepaid Plan

**Lifeline**

#### BASIC INCLUDES:

- ✓ Unlimited Local Calling
- ✓ Emergency 911 Access

Activation Fee

**\$19.95<sup>+</sup>**

Per Month

**FREE**

#### ADVANTAGE INCLUDES BASIC FEATURES PLUS:

- ✓ Caller ID Deluxe
- ✓ Call Waiting Deluxe
- ✓ 60 US Long Distance Minutes

Activation Fee

**\$24.95<sup>+</sup>**

Per Month

**FREE**

\*PLUS Taxes, Fees and Surcharges - never more than \$15 per month.

**Toll Limitation Services can be provided  
at no charge for Lifeline customers.**

For non-qualified lifeline customers  
Standard fee of \$60 required to initiate service. First Month Recurring Charge  
(MRC) waived. Add \$13.50 to above rates for non-lifeline MRCs. Call for details.

### Lifeline Eligibility Requirements:

**You may be eligible for discounted service  
if you receive any of the following:**

- Medicaid • Supplemental Security Income (SSI)
- Federal Public Housing Assistance / Section 8
- Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)
- Low Income Home Energy Assistance Program (LIHEAP)
- Senior citizen low income discount plan offered  
by the local gas or power company.

**CALL TO SEE IF YOU QUALIFY**

Complaints concerning Lifeline/ Linkup service can be directed to the  
Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501

**1-877-283-3888**

*Hablamos Español*

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

Limited time offer. Offer subject to change without notice.  
Prices and features subject to service area.

GLOBAL  
CONNECTION

K-GA-2K10-Q3

GOVERNMENT DISCOUNTED

# Real HOME PHONE SERVICE™



GLOBAL CONNECTION

AFFORDABLE • RELIABLE • CONVENIENT

## The government can help you pay your phone bill!

FOR A LIMITED TIME!

### FREE FIRST MONTH

\*FREE ACTIVATION for Lifetime customers only. See back to details.

- ✓ Save \$13.50 per month (\$162/yr)
- ✓ Save \$60 on activation
- ✓ Unlimited local calls
- ✓ Safe 911 connection

Toll Limitation Services can be provided at no charge for Lifetime customers.

For non-qualified Lifetime customers:  
Standard fee of \$30 is added to local service (\$3.00/line) connecting charge  
(MFC) minimum: Add \$13.50 per month for lifetime (911) service. Call for details.

Pick Your Prepaid Plan	Lifetime
<b>BASIC INCLUDES:</b> <ul style="list-style-type: none"> <li>✓ Unlimited Local Calling</li> <li>✓ Emergency 911 Access</li> </ul>	<b>\$19.95*</b> Per Month FREE
<b>ADVANTAGE INCLUDES BASIC FEATURES PLUS:</b> <ul style="list-style-type: none"> <li>✓ Caller ID Deluxe</li> <li>✓ Call Waiting Deluxe</li> <li>✓ 60 US Long Distance Minutes</li> </ul>	<b>\$24.95*</b> Per Month FREE
Activation Fee	Activation Fee

\*FL US Taxes, Fees and Surcharges—more than \$15 per month.

**Lifetime Eligibility Requirements:**  
You may be eligible for discounted service if you receive any of the following:

- Medicaid • Supplemental Security Income (SSI) • Federal Public Housing Assistance • Section 8 • Temporary Assistance for Needy Families (TANF)
  - Supplemental Nutrition Assistance Program (SNAP) • Low Income Home Energy Assistance Program (LIHEAP) • Senior citizen low income discount
- Placardized by the local gas or power company.

**CALL TO SEE IF YOU QUALIFY!**

Complaints concerning Lifetime/ Linkup service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501

## Hablamos Español 1-877-283-3888

www.RealHomePhone.com

©2008 Real Home Phone Service, Inc. All rights reserved. Service not available in all areas.



# <sup>\*</sup>FREE! FIRST MONTH!

of Real Home Phone Service™  
for qualified Lifeline customers



Plans from as low as

# \$19.95<sup>\*</sup>

Per Month

*The only service  
available at Kroger!*

- ✓ No Credit Check
- ✓ No Contract
- ✓ No Deposit

**IN ALL AT&T SERVICE AREAS**

Who are you going to trust  
for your home phone service?  
For 10 years, Kroger has trusted  
Global Connection to provide their  
customers with affordable and  
reliable Real Home Phone Service.  
Getting service has never been easier



Hablamos Español

**CALL TOLL-FREE AND  
GET CONNECTED:**

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

# 1-866-998-9289

\*Plus taxes fees and surcharges. Activation fee may apply. Must meet Lifeline eligibility requirements to qualify.



# Do you need help paying for Home Phone Service?

## GLOBAL CONNECTION

### CAN HELP YOU!

#### LifeLine

*This program provides  
a discount on the monthly  
cost of telephone service.*

#### Link-Up

*This program provides  
a discount on the installation  
cost of telephone service.*

Do you or someone in your household  
participate in ANY of these programs?

- ☒ Medicaid
- ☒ Food Stamps
- ☒ Supplemental Security
- ☒ Income (SSI)
- ☒ Federal Public Housing Assistance (Section 8)
- ☒ Low-Income Home Energy Assistance Program (LIHEAP)
- ☒ Temporary Assistance to Needy Families (TANF)
- ☒ The National School Lunch Program's Free Lunch Program
- ☒ Low Income/No Income

**Let Global Connection hook you up with  
Government Subsidized Home Phone Service today!**

Qualified customers are entitled to discounted phone service. Now you can afford the safety and reliability of a real home phone. Call Global Connection today to start saving!

**TO SEE IF YOU QUALIFY CALL TOLL-FREE:**

# 866-849-4989

Hablamos Español

RELIABLE  
AFFORDABLE  
CONVENIENT

## SAVE UP TO \$180 PER YEAR



## GLOBAL CONNECTION

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

# Real Home Phone Service™

Limited time **NO RISK OFFER!**

**LIFELINE CUSTOMERS  
GET YOUR FIRST  
30 DAYS FREE!**

in all  
AT&T  
service  
areas.

Then you pay only

**\$19.95\***  
Per Month

for LIFELINE BASIC SERVICE

As a Michigan resident, if you receive government assistance you may be eligible to receive discounted Lifeline home phone service. On March 18th, 2010, the Michigan Public Service Commission authorized GCIA to provide eligible Michigan households with discounted Real Home Phone Service™

For more information call: **1-866-763-3754**

For more information visit: **www.LifelineMI.com**



## Lifeline Phone Application In the State of Michigan

c/o GCIA  
P.O. Box 48269 Atlanta, GA 30362-1269

No payment  
is required  
with this  
application

Please complete  
all items on the form  
below, then Fax it with  
proof of assistance to:  
**1-888-870-9969**

OR

## MAIL FOR FREE

by completing the form below and sealing with business reply address panel on outside. Please seal your form with tape.

**NO STAMPS ARE NEEDED**

**SERVICE ADDRESS**

NAME: (Last) \_\_\_\_\_ (First) \_\_\_\_\_ (MI) \_\_\_\_\_

Address: \_\_\_\_\_ Apt: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

Existing Telephone Number: \_\_\_\_\_ Alternate Telephone Number: \_\_\_\_\_

**BILLING ADDRESS**

NAME: (Last) \_\_\_\_\_ (First) \_\_\_\_\_ (MI) \_\_\_\_\_

Address: \_\_\_\_\_ Apt: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

YOUR REQUEST IS FOR WHICH TELEPHONE SERVICE? CHECK THE ONE THAT APPLIES:

☐ New Service ☐ Transfer Existing Service from (Phone Company Name) \_\_\_\_\_

**NO DEPOSIT  
NO CREDIT CHECK  
NO CONTRACT**

\*PLUS Taxes, Fees and Surcharges – never more than \$15 per month. In all AT&T service areas.

### ☐ LIFELINE BASIC SERVICE INCLUDES:

- Unlimited Local Calling
- Emergency 911 Access

**\$19.95\*** Per Month

### ☐ LIFELINE ADVANTAGE SERVICE INCLUDES BASIC FEATURES PLUS:

- Caller ID • Call Waiting
- 100 Minutes Long Distance

**\$24.95\*** Per Month

### ☐ LIFELINE PREMIUM SERVICE INCLUDES ADVANTAGE FEATURES PLUS:

- Call Forwarding • Call Blocking
- 3 Way Calling • Speed Dial

**\$29.95\*** Per Month

Have you received a Lifeline credit in the past? ☐ Yes ☐ No If so when? \_\_\_\_\_

Have you received The Link-up credit in the past? ☐ Yes ☐ No If so when? \_\_\_\_\_

**Please indicate  
which Government  
assistance program  
you are currently  
enrolled:**

- If you're enrolled in one of these Government programs you could qualify for Lifeline pricing:
- ☐ Medicaid ☐ Section 8 Federal Public Housing Assistance (FPHA) ☐ National School Lunch (free program only)
  - ☐ Food Stamps (SNAP) ☐ Low-Income Home Energy Assistance Program (LIHEAP) ☐ Temporary Assistance for Needy Families (TANF)
  - ☐ Supplemental Security Income (SSI) ☐ Temporary Assistance for Needy Families (TANF) ☐ Total household income at or below 150% of the Federal Poverty Guidelines

Don't qualify for Lifeline? Call us for our low standard pricing on Real Home Phone Service.

I certify, under penalty of perjury, that I reside at the address I provided above and that I am a current recipient of the above program(s) and will notify GCIA when I am no longer participating in at least one of the above designated programs. I certify that I have not received a Link-Up credit at this address during the past twelve months before and that I will not seek a Lifeline credit on more than one phone line. I authorize GCIA or its duly appointed representative to access any records required to verify those statements to confirm my continued qualification for Lifeline and Link-Up discounts. I authorize GCIA to change my preferred carrier status to GCIA for all services for which I have contracted, including local, Intra LATA and/or long distance service, and designate GCIA to act as my agent for the preferred carrier change. I further request my current service provider to remove any preferred carrier freeze on my account. I understand that this preferred carrier change and any future preferred carrier change might involve a charge to me. A description of any and all terms, conditions, and charges that I will incur, including the rate, calling plan and other optional services is clearly set forth and has been made available to me within the Customer Service Agreement on the GCIA web site at [www.RealHomePhone.com](http://www.RealHomePhone.com), and I fully understand all charges that I am to be assessed. I consent to the release of my personal information as may be required for the administration of the Lifeline or Link-Up programs.

☐ I have attached proof of assistance Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Applicant's date of birth: \_\_\_\_\_

Ethnic Background (Optional): This information is for statistical purposes only.

☐ African-American (Black) ☐ American-Indian ☐ Caucasian (White) ☐ Hispanic ☐ Other

Do not write below this line:

Lifeline: ☐ Approved ☐ Denied Link-up: ☐ Approved ☐ Denied GCIA Approval: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City/State: \_\_\_\_\_  
Zip: \_\_\_\_\_



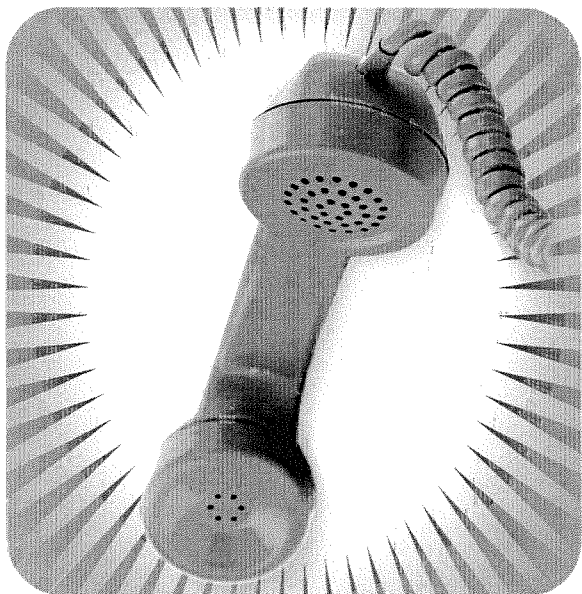
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

**BUSINESS REPLY MAIL**

FIRST-CLASS MAIL PERMIT NO. 825 ATLANTA GA

POSTAGE WILL BE PAID BY ADDRESSEE

MICHIGAN LIFELINE PHONE APPLICATION  
c/o GCIA  
P O BOX 48269  
ATLANTA GA 30362-9848



**At last!**  
*Real* Home Phone Service™  
**you can afford!**

With no contract, deposit or credit check!

**\$19.95\***  
Only Per Month

For more information call:

**1-866-763-3754**

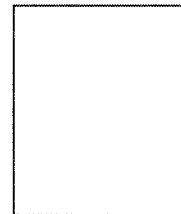
[www.LifelineMI.com](http://www.LifelineMI.com)



**Lifeline Phone Application  
In the State of Michigan**

c/o GCIA  
P.O. Box 48269 Atlanta, GA 30362-1269

**Time Sensitive Material  
Reply Required by  
Friday 4/30/2010**



**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT E**

**USAC Invoice**

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

# STATEMENT OF ACCOUNT

Date	Description	Charges	Credits
	<b>Previous Balance</b>	<b>\$7,055.44</b>	
07/09/2010	Payment		(\$3,527.72)
06/16/2010	Payment		(\$3,527.72)
07/15/2010	Rural Health Care Support Mechanism Charges	\$50.98	
07/15/2010	Rural Health Care Support Mechanism Adjustment - 2010 499A	\$102.04	
07/15/2010	Low Income Support Mechanism Charges	\$498.15	
07/15/2010	Schools & Libraries Support Mechanism Charges	\$799.02	
07/15/2010	Low Income Support Mechanism Adjustment - 2010 499A	\$997.19	
07/15/2010	Schools & Libraries Support Mechanism Adjustment - 2010 499A	\$1,599.46	
07/15/2010	High Cost Support Mechanism Charges	\$1,640.13	
07/15/2010	High Cost Support Mechanism Adjustment - 2010 499A	\$3,283.18	
<b>TOTAL OUTSTANDING USAC BALANCE AS OF 7/15/2010</b>		<b>\$8,970.15</b>	

15  
6/1/10

Transactions occurring after 07/15/2010 are not reflected on this statement.

Under the Debt Collection Improvement Act of 1996 (Pub. L. 104-134) (DCIA), your BALANCE DUE is a demand that you pay a DEBT owed to the United States on or before the DUE DATE. If the DUE DATE is non-business day, payment must be received the business day before that date. Any portion of the DEBT unpaid after the DUE DATE is a DELINQUENT DEBT, which may result in sanctions, including interest, penalties, and administrative charges. Failure to file a Telecommunications Worksheet may result in a late filing fee DEBT added to your BALANCE DUE. Read the reverse of this Invoice for important information about those sanctions and your legal rights and obligations.

Statement Date	Invoice Number	Filer 499 ID	Balance Due USAC
07/22/2010	UBD10000433759	827598	\$ 8,970.15
<b>FORM 499Q DATA</b>  This month's support mechanism charges were calculated using an FCC contribution factor of 0.136000 and the following revenue data:  <div style="text-align: center;"><u>May 2010 499Q</u></div> <div style="display: flex; justify-content: space-between;"> <div>120b</div> <div>\$75,000.00</div> </div> <div style="display: flex; justify-content: space-between;"> <div>120c</div> <div>\$0.00</div> </div> If the figures do not correspond with your records, please contact USAC Customer Service at 888-641-8722		<b>PAYMENT INFORMATION</b>  All payments received (regardless of specific instructions) will be applied to your outstanding USAC balance in historical order as outlined in FCC order 07-150.  Please remit ACH payments in a CCD+ format to ABA #071000039, Account #5590045653.  All Wire Transfers should be sent to ABA #026009593, DDA (or Account) #5590045653.  Payments must include your Company Name, Filer 499 ID, and Invoice Number to ensure timely posting.	

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT F**

**Prescription Drug Discount Plan Sample**



# WELCOME TO

## GLOBALCARES<sup>SM</sup>

Discount Prescription Drug Program

### Global Connection's **FREE** Prescription Drug Discount Plan

**SAVE  
UP TO 50%  
ON PRESCRIPTION  
DRUG PURCHASES**

at over 50,000 locations, including  
Kroger, CVS, Walmart, Target,  
Rite-Aid and Walgreens!



### Includes **ALL** Prescription Drugs!

Unlike many discount plans, GlobalCares<sup>SM</sup>  
provides discounts on **ALL** FDA-Approved prescription drugs.

**There are no limited drug lists!**

This plan applies to your entire family, because everyone  
deserves to save. Any family member can present this card every  
time they need to fill a prescription for instant savings.



✂ DETACH CARD ALONG THIS LINE ✂

### This is Your Prescription Drug Discount Card!

BRUGHT TO YOU BY:

*Real*  
**HOME  
PHONE  
SERVICE**

- ✓ No Credit Check
- ✓ No Contract
- ✓ No Deposit

Refer all your friends to Global  
and earn money today!

GLOBAL CONNECTION [www.RealHomePhone.com](http://www.RealHomePhone.com)

CALL TOLL FREE  
TO GET CONNECTED WITH  
REAL HOME PHONE SERVICE

**1-877-309-5579**

Hablamos Español

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT G**

**Form 497 – Lifeline and Link Up Worksheet**



# LIFELINE AND LINK UP WORKSHEET

Avg. Burden Est. per Respondent: 3.0 Hrs.

USAC Service Provider Identification Number (1) 143034313

Serving Area (2) 259028

(3)

(4)

Company Name:	<u>Global Connection Inc of America</u>	a) Submission Date	<u>07/16/2010</u>
Mailing Address:	<u>5555 Oakbrook Parkway</u>	b) Data Month	<u>June 2010</u>
	<u>Suite 620</u>	c) Type of filing (Check one):	Original <input checked="" type="checkbox"/> Revision <input type="checkbox"/>
	<u>Norcross, GA 30093</u>	d) State Reporting	<u>ALABAMA</u>
Contact Name:	<u>Neil Savignano</u>		
Telephone Number:	<u>678-741-6246</u>		
Fax Number:	<u>678-741-6333</u>		
E-mail Address:	<u>nsavignano@globalconnectioninc.com</u>		

Lifeline	# Lifeline Subscribers (a)	Lifeline Support/Subscriber (b)*	Total Lifeline Support (c)
Tier 1 Low-Income Subscribers receiving federal Lifeline Support	(5) <u>2617</u>	<u>x</u> \$ <u>6.50</u>	= \$ <u>17011</u>
Tier 2 Low-Income Subscribers receiving federal Lifeline Support	(6) <u>2617</u>	<u>x</u> \$ <u>1.75</u>	= \$ <u>4580</u>
Tier 3 Low-Income Subscribers receiving federal Lifeline Support	(7) <u>2617</u>	<u>x</u> \$ <u>1.75</u>	= \$ <u>4580</u>
Tier 4 Low-Income Subscribers receiving federal Lifeline Support	(8) <u>0</u>	<u>x</u> \$ <u>0.00</u>	= \$ <u>0</u>
Check box to the right if <b>partials</b> or <b>pro rata amounts</b> are used. Indicate dollar amount, if applicable, on line 9.			<input checked="" type="checkbox"/> \$ <u>-829</u> (9)
<b>NOTE: (Do not include partials or pro rata amounts on lines 5 - 8 above)</b>			
Total federal Lifeline support claimed			\$ <u>25342</u> (10)
*For multiple rates, use an average amount			(Sum of lines 5c, 6c, 7c, 8c & 9)

Link Up	Non-Tribal (a)	Tribal (b)	Total Link Up (c)
Number of Connections waived	(11) <u>1305</u>	<u>0</u>	
Charges waived per Connection*	(12) \$ <u>30.00</u> (\$30 max)	\$ <u>0.00</u> (\$100 max)	
Total Connection charges waived	(13) \$ <u>39150</u>	\$ <u>0.00</u>	
Deferred Interest	(14) \$ <u>0.00</u>	\$ <u>0.00</u>	
Total Link Up dollars waived	(15) \$ <u>39150</u>	+ \$ <u>0</u>	= \$ <u>39150</u> (15c)
*For multiple rates, use an average amount			

<b>Toll-Limitation Services (TLS)</b>			
Incremental cost of providing TLS	(16) \$ <u>7.770000</u>		
Number of subscribers for whom TLS initiated	(17) <u>1752</u>	Total TLS dollars claimed	\$ <u>13613</u> (18)
<b>ETC Payment (19)</b>			
Total Lifeline	\$ <u>25342</u>	Total TLS	\$ <u>13613</u>
Total Link Up	\$ <u>39150</u>		
Total Dollars		\$ <u>78105</u>	

If you have any questions, please call USAC at (866) 873(USF)-4727 Toll Free

## LIFELINE AND LINK UP WORKSHEET

Avg. Burden Est. per Respondent: 3.0 Hrs.

### CERTIFICATIONS AND SIGNATURES (20)

I certify that my company will publicize the availability of Lifeline and Linkup services in a manner reasonably designed to reach those likely to qualify for those services.

I certify that my company will pass through the full amount of all Tier Two, Tier Three, and Tier Four federal Lifeline support for which my company seeks reimbursement, as well as all applicable intrastate Lifeline support, to all qualifying low-income subscribers by an equivalent reduction in the subscriber's monthly bill for local telephone service.

I certify that my company has received any non-federal regulatory approvals necessary to implement the required rate reduction(s).

I certify that my company is   ✓   is not        subject to state regulation. (Please check one.)

Based on the information known to me or provided to me by employees responsible for the preparation of the data being submitted, I certify that the data contained in this form has been examined and reviewed and is true, accurate, and complete.

I acknowledge the Fund Administrator's authority to request additional supporting information as may be necessary.

07/16/2010

DATE

Controller

OFFICER/EMPLOYEE TITLE

Neil Savignano

OFFICER/EMPLOYEE SIGNATURE

Neil Savignano

OFFICER/EMPLOYEE NAME

NOTICE: To implement Section 254 of the Communications Act of 1934, as amended, the Federal Communications Commission has adopted changes to the federal low-income programs. The Commission has expanded the availability of these programs and the level of funding for discounts to low-income customers.

The following worksheet provides the means by which eligible telecommunications carriers will be reimbursed by the Universal Service Administrative Company (USAC) for their participation in these programs. Failing to collect the information, or collecting it less frequently, would prevent the Commission from implementing sections 214 and 254 of the Act, would thwart Congress' goals of providing affordable service and access to advanced services throughout the nation, and would result in eligible telecommunications carriers not receiving universal service support reimbursements in a timely fashion.

We have estimated that each response to this collection of information will take, on average, three hours for each respondent. Our estimate includes the time to read this data request, review existing records, gather and maintain required data, and complete and review the response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERF, Washington, D.C. 20554, Paperwork Reduction Project (3060-0819). We will also accept your comments on the burden estimate via the Internet if you send them to [jboley@fcc.gov](mailto:jboley@fcc.gov). Please DO NOT SEND the data requested to this e-mail address.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your worksheet may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your worksheets may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding.

If you do not provide the information we request on the form, the FCC may delay processing of your worksheet or may return your worksheet without action.

The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. Section 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. Section 3501, et seq.

**GLOBAL CONNECTION, INC. OF AMERICA**

**EXHIBIT H**

**Section 12.2 of Commercial Agreement with AT&T**

**By and Between**

**AT&T**

**And**

**Global Connection Inc. of America**

**12.0 Intercarrier Compensation Responsibilities**

- 12.1 For purposes of traffic compensation matters, CARRIER and AT&T-22STATE agree that CARRIER shall be considered a facilities-based local exchange carrier in its use of LWC and LWCALs in the same manner as if CARRIER were using the “Unbundled Network Element-Platform” or “UNE-P” (as such has been understood by the Federal Communications Commission) to provide local telephone service to the LWC End Users. CARRIER shall be responsible for any and all compensation owed for traffic originating from, or terminating to, CARRIER's LWCALs. Traffic compensation between CARRIER and AT&T-22STATE is expressly not addressed in this Agreement (including without limitation this Attachment).
- 12.2 CARRIER shall be solely responsible for establishing traffic compensation arrangements with third parties, including other telecommunications carriers (e.g., ILECs, interexchange carriers, CMRS, CLECs) for traffic originated from, or terminated to, CARRIER's LWCALs. The foregoing includes exchange access charges and reciprocal compensation charges. CARRIER shall indemnify, defend, and hold harmless AT&T-22STATE against any charges, claims, damages, liabilities and expenses from third parties (“Compensation Losses”) arising from traffic originated from and/or terminated to any CARRIER LWCAL. AT&T-22STATE may provide information on any LWC-related traffic to other telecommunications carriers or any third party as appropriate to resolve traffic issues, including without limitation those involving compensation. CARRIER agrees that AT&T-22STATE is not required to function as a billing intermediary for billing and payment of LWC-related traffic exchanged between CARRIER and any third party carrier and/or any other third party. Under no circumstances will AT&T-22STATE be required to pay any compensation to any third party carrier or to any other third party including, without limitation, a third party carrier for termination of traffic originated from, or terminated to, a LWCAL Number. If needed and to the extent AT&T-22STATE has any rights to third party compensation rights with respect to any such traffic and traffic compensation matters, AT&T-22STATE hereby assigns any such third party compensation rights to CARRIER.
- 12.3 Under no circumstances shall AT&T-22STATE be liable to CARRIER or any third party for any Compensation Losses including, without limitation, intrastate and/or interstate switched access charges, arising out of or related to Voice Over Internet Protocol traffic or any interexchange circuit-switched traffic utilizing in whole or part IP technology terminated to an LWCAL that was delivered to AT&T-22STATE for termination to an LWCAL over local interconnection trunk groups from a third party carrier.
- 12.4 Nothing in the Agreement (including without limitation this Attachment) affects the right of AT&T-22STATE to charge any telecommunications carrier or other entity for any entrance facilities and/or interconnection facilities provided by AT&T-22STATE.
- 12.5 Notwithstanding any other provision of the Agreement including without limitation this Attachment, LWC shall not be available in any State until there is an agreement effective between the Parties for that State which addresses the intercarrier compensation associated with LWC-originated or -terminated traffic which is subject to Section 251 and/or 252.

**13.0 Operational Issues**

- 13.1 AT&T-22STATE and CARRIER agree to mutually work on evolving the LWC ordering processes to achieve an objective of Flow Through level of 95% of Local Service requests (LSRs) for LWC.
- 13.2 Ordering and Trouble Reporting Interfaces must be electronic via existing and currently supported AT&T-22STATE versions of OSS interfaces. CARRIER must at all times use the then-most current version of the Electronic Bonding Trouble Administration (“EBTA”) GUI and/or the EBTA APP to APP interfaces offered by AT&T-22STATE for submitting trouble tickets, including as such interfaces may be modified, updated and/or replaced from time to time.

**14.0 LWC-Specific Events of Default**

- 14.1 The following shall also be considered an “Event of Default” under the Agreement: