

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**WASHINGTON HARBOUR, SUITE 400**

**3050 K STREET, NW**

**WASHINGTON, DC 20007**

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY  
LOS ANGELES, CA  
CHICAGO, IL  
STAMFORD, CT  
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICE  
MUMBAI, INDIA

Docket No. 16-00080

July 14, 2016

Chairman, Tennessee Regulatory Authority  
c/o Ms. Sharla Dillon, Dockets and Records Manager  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

Re: Global Connection Inc. of America; Petition for Designation as  
a Wireline Eligible Telecommunications Carrier in the State of Tennessee

Dear Ms. Dillon,

Enclosed on behalf of Global Connection Inc. of America, please find an original and four (4) copies of the above-referenced petition for filing with the Authority. A check in the amount of \$25.00 to cover the filing fee has been submitted under separate cover. An electronic copy of this filing is being submitted concurrently pursuant to Tennessee Regulatory Authority Rule § 1220-1-1-.03(7).

Please date-stamp the duplicate copy of this submission upon receipt and return it in the self-addressed envelope provided. If there are any questions concerning this filing, please contact me at (202) 945-6649 or via email at [wbrantl@kelleydrye.com](mailto:wbrantl@kelleydrye.com). Thank you in advance for your assistance with this matter.

Respectfully submitted,



Winafred Brantl

enclosures

**GLOBAL CONNECTION INC. OF AMERICA** )  
)  
**Petition for Designation as a Wireline Eligible** )  
**Telecommunications Carrier in the State of** )  
**Tennessee** )

Global Connection Inc. of America (Global Connection or the Company), by its undersigned counsel, respectfully submits this Petition for designation as an eligible telecommunications carrier (ETC) pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (Act)<sup>1</sup>, sections 54.101 *et seq.* through 54.207 of the rules of the Federal Communications Commission (FCC),<sup>2</sup> and the rules and regulations of the Tennessee Regulatory Authority (Authority). Global Connection requests that the Authority designate it as a wireline ETC throughout the AT&T, CenturyLink and Frontier service territories (Designated Service Area) to provide Lifeline-discounted local exchange and long distance services to low-income consumers in Tennessee. The Company does not request designation to receive high-cost support.<sup>3</sup> As demonstrated below, Global Connection satisfies all of the statutory and regulatory requirements for designation as an ETC in Tennessee. The Company is an established wireline carrier, operating in over two dozen states and is already designated

<sup>3</sup> Consistent with FCC holdings, there is no need for a “creamskimming” analysis in connection with Global Connection’s Petition because the Company is seeking ETC designation only for purposes of receiving federal low-income support. *See, e.g., Virgin Mobile USA, L.P.*, CC Docket No. 96-45, Order, FCC 09-18, ¶ 39 n. 101 (2009).

as a wireline ETC in seven states and as a wireless ETC in twenty-four jurisdictions.

Designation of Global Connection as an ETC in Tennessee will serve the public interest.

Global Connection further requests that the Authority grant this Petition expedited review and approval. At this time, in a number of states where it is not designated an ETC (including Tennessee), Global Connection makes Lifeline services available to consumers by resale of the underlying carrier's already-discounted Lifeline services.<sup>4</sup> In Tennessee, the Company currently serves approximately 794 customers in this manner. Historically, this arrangement has been approved by the FCC.<sup>5</sup> Pursuant to a recent FCC decision; however, Lifeline reimbursement will soon cease to be available to carriers for any wholesale services sold to resellers.<sup>6</sup> In the 2015 Lifeline Second Report and Order, the FCC concluded that it is in the public interest that Lifeline-discounted service be provided only directly by ETCs that hold federal or state designations.<sup>7</sup> As a result, the FCC will require direct provisioning of Lifeline services by ETCs and will thus eliminate the arrangement under which Global makes Lifeline services available to its wireline Tennessee customers. Moreover, the FCC will forbear from applying section 251(c)(4) (requiring an incumbent LEC to offer its Lifeline service to resellers) which "will effectively eliminate non-ETC resellers [of Lifeline

---

<sup>4</sup> Global Connection provides Lifeline services through resale by purchasing the already-discounted Lifeline services of underlying carriers, primarily AT&T. For these services, Global Connection does not seek nor does it receive any reimbursement from USAC. Instead, the underlying carrier, a designated ETC, seeks reimbursement.

<sup>5</sup> Initially, the FCC considered reselling of Lifeline services by non-ETCs as beneficial to competition and consumer access to the discounted services. *See, e.g., Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 97-157, ¶ 370 (1997).

<sup>6</sup> *See Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect American Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶¶ 244, 249 (2015) (2015 Lifeline Second Report and Order).

<sup>7</sup> *See id.* ¶ 255.

service].”<sup>8</sup> This change takes effect August 15, 2016.<sup>9</sup> In its decision, the FCC recognized the need for a window prior to the effective date, during which companies currently reselling an underlying carrier’s discounted Lifeline service could apply for and obtain their own designations in order to continue serving existing Lifeline customers.<sup>10</sup> Global Connection seeks designation for precisely this reason – so that it may continue to serve the Tennessee consumers to whom it currently provides Lifeline services. The Company believes that expedited review and approval of its request is appropriate in order to ensure continuity of service to these customers and to avoid the necessity and disruption of a major discontinuance proceeding for approximately 800 Tennessee customers.

In support of this Petition, Global Connection provides the following information:

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

Joshua T. Guyan  
Kelley Drye & Warren LLP  
3050 K Street, NW, Suite 400  
Washington, D.C. 20007  
Tel: (202) 342-8566  
Fax: (202) 342-8451  
Email: [jguyan@kelleydrye.com](mailto:jguyan@kelleydrye.com)

---

<sup>8</sup> *See id.* ¶ 249. Indeed, major incumbent carriers have notified their carrier-customers that upon effectiveness of the FCC decision, Lifeline services will no longer be available for resale. *See, e.g.*, September 29, 2015 letter from AT&T to Global Connection (copy attached as **Exhibit A**).

<sup>9</sup> 2015 Lifeline Second Report and Order ¶ 256 (setting a window of 180 days following the order’s effective date following Paperwork Reduction Act approval by the Office of Management and Budget, for the end of resold Lifeline services); Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, 81 Fed. Reg. 31,7999,31,8000 (Feb. 17, 2016).

<sup>10</sup> 2015 Lifeline Second Report and Order ¶ 249.

with a copy to:

David Skogen  
President and CEO  
Global Connection Inc. of America  
5555 Oakbrook Parkway, Suite 620  
Norcross, Georgia 30093  
Email: [dskogen@gcioa.com](mailto:dskogen@gcioa.com)

## **I. COMPANY OVERVIEW**

Global Connection is a Georgia corporation<sup>11</sup> located at 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093. Global Connection provides prepaid wireline local exchange and long distance services to residential customers in 26 states.<sup>12</sup> Global Connection also provides wireless services in 24 territories.<sup>13</sup> In Tennessee, Global Connection was granted authority by the Authority to provide prepaid intrastate telecommunications services on September 14, 1999 in Docket No. 99-00624<sup>14</sup> and elected to operate pursuant to market regulation under T.C.A. § 65-5-109 on November 4, 2015. The Company serves approximately 1,179 wireline Lifeline and non-Lifeline customers in Tennessee.<sup>15</sup>

---

<sup>11</sup> Global Connection was incorporated in the State of Georgia on June 1, 1998. Copies of Global Connection's articles of incorporation and authority to transact business in Tennessee as a foreign corporation were filed in the Company's certification and name change dockets, referenced herein, and are incorporated by reference.

<sup>12</sup> The 26 states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, North Carolina, Nebraska, New Mexico, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, Washington, Wisconsin, and West Virginia. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

<sup>13</sup> The 24 territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

<sup>14</sup> The Company was authorized and originally operated in Tennessee under the name Global Connection Inc. of Tennessee. On September 30, 2009, the Authority approved the Company's change of name to Global Connection Inc. of America. (Docket No. 09-00092).

<sup>15</sup> Global Connection is in good standing with all Authority orders, rules and regulations.

The Company is designated as an ETC to provide Lifeline services to low-income consumers on a wireline basis in Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina, and on a wireless basis in all 24 of its wireless service territories.<sup>16</sup> As discussed above, the Company also makes wireline Lifeline services available in additional states, including Tennessee, through resale of AT&T Lifeline services. At this time, the Company is preparing to file applications for designation in several states other than Tennessee where it currently provides wireline Lifeline service through resale of an underlying carrier's discounted Lifeline service. No petition for designation of Global Connection as an ETC for Lifeline purposes has been denied.

Global Connection's prepaid wireline services are affordable and attractive to low-income consumers who may be challenged to meet the credit history and associated deposit requirements of the incumbent wireline carrier or other competitive providers. The Company provides competitive wireline phone services with a variety of available calling features supported by a dedicated customer service team. Global Connection's plans and offerings are geared toward serving low-income Tennessee customers, and its service models and pricing plans reflect this mission.

Global Connection Lifeline customers in Tennessee will continue to have several plans from which to choose. As an ETC, Global Connection will offer the following plans:<sup>17</sup>

**Basic Package.** Global Connection will provide qualified Tennessee Lifeline customers with unlimited local calling at a discounted flat rate as follows:

---

<sup>16</sup> See n. 13.

<sup>17</sup> The prices noted for these service packages reflect application of the federal \$9.25 discount as well as an additional Company discount of \$3.50.

<b>AT&amp;T</b>	<b>CenturyLink/Frontier</b>
\$20.70 per month, plus fees and taxes	\$36.70 per month, plus fees and taxes

**Advantage Package.** Global Connection will provide qualified Tennessee Lifeline customers with unlimited local calling plus 100 minutes of long distance. This package also includes Caller ID and Call Waiting and is available at a discounted flat rate as follows:

<b>AT&amp;T</b>	<b>CenturyLink/Frontier</b>
\$25.70 per month, plus fees and taxes	\$46.70 per month, plus fees and taxes

**Premium Package.** Global Connection will provide qualified Tennessee Lifeline customers with unlimited local calling plus 100 minutes of long distance. This feature-rich package also includes Caller ID, Call Waiting, Call Forwarding, Call Return, 3-Way Calling, Call Blocking, and Call Trace and is available at a discounted flat rate as follows:.

<b>AT&amp;T</b>
\$30.70 per month, plus fees and taxes

Customers for any of these service packages may purchase additional domestic long distance calling in the amount of 250 minutes for \$5.00 or unlimited domestic long-distance for \$10.00 per month. Additional information regarding the Company's plans, rates, and terms and conditions can be found on its website at [www.connectwithglobal.com](http://www.connectwithglobal.com).

Global Connection does not conduct credit checks, will not require service contracts from its customers and will always ensure competitively low pricing for its services and products. As a result, Global Connection can reach out to those consumers who are often ignored by traditional wireline carriers.

## **II. REQUESTED SERVICE AREA**

Global Connection respectfully requests that the Authority designate it as an ETC to provide Lifeline services to low-income Tennessee customers throughout the territories of AT&T, CenturyLink and Frontier. A list of the wire centers included in this territory is attached hereto as **Exhibit B**.

## **III. THE AUTHORITY HAS JURISDICTION TO DESIGNATE GLOBAL CONNECTION AS AN ETC**

Pursuant to the provisions of 47 U.S.C. § 214(e)(2), as well as the laws of the State of Tennessee and its own regulations, the Authority has the authority to designate a common carrier, otherwise subject to its jurisdiction,<sup>18</sup> as an ETC.

## **IV. GLOBAL CONNECTION MEETS THE REQUIREMENTS FOR DESIGNATION AS AN ETC TO SERVE THE DESIGNATED SERVICE AREA**

Section 214(e)(1) of the Act provides that, upon request and consistent with the public interest, convenience and necessity, the Authority may designate more than one common carrier as an ETC in areas served by a rural telephone company and shall do so with respect to all other areas, provided that the carrier (i) offers the services that are supported by the federal universal service support mechanisms and (ii) advertises the availability of such services. As demonstrated below, Global Connection fully meets these requirements for ETC designation.

### **1. Global Connection Will Operate as a Common Carrier**

Global Connection is a common carrier, licensed to provide competitive wireline telecommunications services in twenty-six states, including Tennessee. The Company also holds interstate and international section 214 authority from the FCC.

---

<sup>18</sup> Common carriers not subject to a state commission's jurisdiction may request designation by the FCC. *See* 47 § U.S.C. 214(e)(6).



## **2. The Company Will Provide the Services Designated for Lifeline Support**

Global Connection will offer all of the supported services enumerated under section 254(c) of the FCC's rules, codified as 47 C.F.R. § 54.101(a). Specifically, the Company will provide the supported services as follows:

### *A. Voice grade access to the Public Switched Telephone Network*

The FCC describes "voice grade access" as the ability for a user to make and receive telephone calls within a specified bandwidth. Global Connection will provide this service through resale of underlying AT&T, CenturyLink and Frontier wireline services already approved by the Authority.

### *B. Local usage*

The FCC's rules require that ETCs provide "minutes of use for local service at no additional charge."<sup>19</sup> Global Connection's proposed Lifeline plans, as discussed above, all provide unlimited local calling without any additional incremental per call charge above the basic service rate.<sup>20</sup>

### *C. Access to emergency services*

Through arrangements with its underlying carrier(s), Global Connection will provide its Lifeline customers with access to emergency voice telephony services provided by local government and/or public safety officials, including 911 and E911 where available and will comply with all 911/E911 requirements imposed by federal, state and/or local jurisdictions as well as the FCC and this Authority.

---

<sup>19</sup> 47 C.F.R. § 54.101(a).

<sup>20</sup> To date, the FCC has not identified a specific minimum amount of local usage.

*D. Toll limitation for qualifying low-income customers*

Toll limitation enables customers to prevent unexpected charges for long distance calling. Because Global Connection's services are prepaid, the Company's customers will not bear the risk of such burdensome charges. In the event that Global Connection offers a Lifeline service plan that is not prepaid or which will potentially apply additional charges for long distance calling, the Company will use the appropriate toll limitation technology to provide this required service at no additional charge to Lifeline customers.

*E. Means of providing Lifeline service*

As discussed above, Global Connection will provide Lifeline services via resale of underlying carrier services provided by AT&T, CenturyLink and Frontier. Section 214(e)(1)(A) of the Act provides that an ETC must provide services "using its own facilities or a combination of its own facilities and resale of another carrier's services."<sup>21</sup> Pursuant to the FCC's 2012 Lifeline Reform Order, however, resellers are granted blanket forbearance from this facilities requirement, subject to conditions, in connection with limited ETC designation to participate in the Lifeline program.<sup>22</sup> The FCC conditioned blanket forbearance on the reseller's compliance with certain ETC obligations, including the provision of 911/E911 voice telephony service to customers regardless of their activation status and available calling minutes.<sup>23</sup> In addition, the reseller must adhere to an FCC-approved compliance plan that includes specific information about the reseller's service offerings and outlines the measures

---

<sup>21</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>22</sup> See *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 Nos. 11-42, 03-109, 12-23, CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, ¶ 368 (2012) (2012 Lifeline Reform Order).

<sup>23</sup> See *id.* ¶ 373. There are also requirements to provide E911-compliant handsets and to replace E911 non-compliant handsets at no charge to the Lifeline voice telephony service customer. These are not applicable to wireline carriers.

that the reseller will take to implement the obligations established in the 2012 Lifeline Reform Order.<sup>24</sup>

Global Connection commits to compliance with these conditions. On June 26, 2012, Global Connection submitted its proposed compliance plan for wireline Lifeline services, outlining the measures the Company would take to implement the conditions imposed by the Commission in its 2012 Lifeline Reform Order. Following revisions on September 17, 2012, the plan remains pending. The Company also has an approved wireless compliance plan, originally filed on March 8, 2012 and most recently revised on April 30, 2012. The Commission approved Global Connection's wireless compliance plan on May 25, 2012.<sup>25</sup>

Following discussion with FCC Wireline Competition Bureau (Bureau) staff, specifically addressing the Company's need for wireline ETC designations in several states, including Tennessee, Global Connection submitted proposed revisions to the Company's approved wireless compliance plan to incorporate the provision of Lifeline services on a wireline basis.<sup>26</sup> These revisions were subsequently updated on June 3, 2016 and remain pending. Pursuant to more recent discussion with Bureau staff, Global Connection has now submitted a revised and updated draft of its proposed wireline compliance plan, which will replace the amended wireless compliance plan.<sup>27</sup> The Bureau intends to review and take action on the revised wireline compliance plan. A copy of Global Connection's proposed

---

<sup>24</sup> See *id.* ¶ 368.

<sup>25</sup> See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

<sup>26</sup> *Global Connection Inc. of America Amended Compliance Plan*; WC Docket Nos. 09-197, 11-42 (filed April 1, 2016).

<sup>27</sup> *Global Connection Inc. of America Wireline Service Compliance Plan*; WC Docket Nos. 09-197, 11-42 (filed July 14, 2016).

wireline compliance plan is appended as **Exhibit C** (Compliance Plan). Following FCC approval of the proposed revisions, Global Connection will not be required to meet the “own facilities” requirement of section 214(e)(1)(A) for its wireline Lifeline services.

Consequently, the Company’s proposal to operate as an ETC in Tennessee, utilizing resold services, will be entirely compliant with FCC requirements.<sup>28</sup>

### **3. Global Connection Will Advertise the Availability of the Supported Services**

The FCC adopted specific requirements for disclosures in Lifeline advertising in the 2012 Lifeline Reform Order. Global Connection already complies with these requirements in states where it is designated an ETC and will comply with respect to Tennessee operations following designation by this Authority.<sup>29</sup>

The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; (5) the program is limited to one discount per household; (6) documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).<sup>30</sup> These statements are included in all print, audio, video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.<sup>31</sup> This specifically includes the Company's website as well as outdoor signage.<sup>32</sup>

---

<sup>28</sup> See 47 C.F.R. § 54.410.

<sup>29</sup> See 2012 Lifeline Reform Order ¶¶ 275-82.

<sup>30</sup> See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

<sup>31</sup> See *id.*

<sup>32</sup> See *id.*

The Company's application and certification forms will state the following:

- the service is a Lifeline service;
- Lifeline is a government assistance program; and
- only eligible consumers may enroll in the program.<sup>33</sup>

In addition, these forms will state that 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.

Global Connection is fully prepared to comply with federal requirements that it advertise the availability of its services throughout its Designated Service Area using media of general distribution.<sup>34</sup> Also, Global Connection further commits that it will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.<sup>35</sup> As a result, more low-income Tennessee residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to Global Connection's service. Samples of the Company's marketing materials are included as Exhibit C to Global Connection's proposed Compliance Plan, attached hereto as **Exhibit C**.

#### **4. Global Connection Complies with the FCC's Additional Obligations for ETCs**

In addition to meeting the statutory criteria discussed above, Global Connection complies with the standards established by the FCC and the Authority for Lifeline ETCs.<sup>36</sup>

---

<sup>33</sup> See 47 C.F.R. § 54.405(c).

<sup>34</sup> See 47 C.F.R. § 54.201(d)(2).

<sup>35</sup> See 47 C.F.R. § 54.405(b).

<sup>36</sup> See *Federal-State Joint Commission on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46, ¶¶ 40-43 (2005).

*A. Global Connection will comply with service requirements.*

Per the requirements of 47 C.F.R. § 54.202(a)(1)(i) Global Connection certifies that it will comply with the service requirements applicable to the low-income support it receives as a result of designation as an ETC for purposes of providing Lifeline services. Global Connection not only commits to provide service throughout its Designated Service Area, but also commits to provide universal service in a timely manner to all customers who make a reasonable request for service pursuant to FCC and Authority rules.<sup>37</sup>

*B. Global Connection's service will remain functional in emergency situations*

Global Connection's Lifeline services will remain functional in emergency situations.<sup>38</sup> As discussed above, Global Connection will utilize the extensive and well-established network facilities of its underlying carriers, AT&T, CenturyLink and Frontier. As a result, the Company is able to support Global Connection Lifeline customers with the same ability to remain functional in emergency situations as currently provided by these carriers to their own customers. As the Authority is well aware, the networks of AT&T, CenturyLink and Frontier are demonstrably robust, equipped with sufficient back-up power to remain functional in the absence of an external power source, and capable of re-routing traffic around damaged facilities as well as managing traffic spikes resulting from emergency situations.<sup>39</sup>

*C. Global Connection commits to consumer protection and service quality*

Global Connection commits to compliance with and satisfaction of all applicable state and federal requirements related to consumer protection and service quality standards. In its current operations and with respect to future operations as an ETC in Tennessee, Global

---

<sup>37</sup> See 47 C.F.R. § 54.202(a)(1).

<sup>38</sup> See 47 C.F.R. § 54.202(a)(2).

<sup>39</sup> See, e.g., AT&T 2015 FCC Form 481 certification regarding functionality in emergency situations, available at <http://apps.fcc.gov/ecfs/comment/view?id=60001089373>.

Connection is committed to full compliance with federal, state and local consumer privacy protection standards, including but not limited to the protection of designated customer information (Customer Proprietary Network Information or CPNI). The Company will certify compliance with the same to the FCC on an annual basis. Global Connection also recognizes the competitive imperative to set and maintain high standards of service quality and commits to do the same as a Tennessee ETC. Indeed, the Company's long history as a wireline provider attests to its understanding of this requirement and to its successful implementation of operational standards and customer service programs. Global Connection has established customer care programs that demonstrate its commitment to service quality and customer satisfaction.<sup>40</sup>

The contact information for Global Connection's designated representative for resolution of customer service, service quality, and/or Lifeline inquiries is:

Michael Khoury – Director of Administration  
Global Connection Inc. of America  
5555 Oakbrook Parkway, Suite 620  
Norcross, GA 30093  
Tel: (678) 741-6444  
Email: [khoury@gcioa.com](mailto:khoury@gcioa.com)

*D. Financial and technical requirements*

The FCC rules require that a carrier seeking designation as a Lifeline-only ETC demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules. Global Connection fully satisfies this requirement. Global Connection has been offering non-Lifeline and Lifeline wireline services since 1998 and has been providing non-Lifeline and Lifeline wireless

---

<sup>40</sup> Global Connection will report information to both the FCC and to the Authority annually regarding the number of consumer complaints received per 1,000 lines. *See Federal-State Joint Commission on Universal Service*, CC Docket No. 96-45, First Report and Order, FCC 97-157 (1997) (USF Order).

services since 2011. The Company generates substantial revenues from the provision of non-Lifeline services, which currently represent nearly a quarter of its wireline customers.<sup>41</sup> As a result, the Company has not relied – and, in future, will not rely – exclusively on Lifeline reimbursements to support its operations. Moreover, Global Connection has access to capital from its investors. The current majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm that specializes in making control equity investments in established operating businesses in a wide variety of industries with valuations of up to \$150 million. In addition, one of the Company’s minority investors, Banyan Investments, a Florida mezzanine investment firm, has made and continues to make additional funding available as needed.

Similarly, Global Connection has the technical competence to provide the proposed services. The Company has been providing wireline telecommunications services throughout the United States for over 17 years, and nearly as long in Tennessee, steadily developing its strategic insights and improving its customer offerings. Today, Global Connection’s telecommunications operations are managed and maintained by a seasoned team of industry veterans. Information regarding the backgrounds of key management personnel is attached as **Exhibit D**. Moreover, because Global Connection will operate as a reseller, the underlying technical management of its services will be supported by the expertise of its underlying carrier(s).

---

<sup>41</sup> Global Connection continues to develop and grow its non-Lifeline wireline customer base. The Company is nearing completion of a 19-state transaction through which Global Connection is acquiring approximately 8,700 customers, three-fourths of which are non-Lifeline customers, from Budget Prepay, Inc. Following the completion of this transaction, non-Lifeline customers will represent approximately 39% of the Company’s wireline subscribers.



*E. Global Connection will comply with the Lifeline certification and verification requirements of 47 C.F.R. § 54.410*

Global Connection is committed to compliance with and support for the FCC's continuing efforts to eliminate waste, fraud and general abuse of resources in the Lifeline program. In response to the FCC's evolving regulations for certification and verification of a customer's qualification for Lifeline service, the Company has implemented and updated its procedures to ensure these requirements are met. Global Connection's proposed Compliance Plan, provided here as **Exhibit C**, describes the detailed and comprehensive procedures set in place by the Company to address requirements both for customer certification and verification and with respect to de-enrollment and duplication of service. These procedures comply fully with the FCC's most recently revised Lifeline program rules and, indeed, go beyond those requirements.

New Global Connection customers must choose a plan upon enrollment. Customers for the Company's wireline Lifeline services can enroll in person, by calling Global Connection's customer service center or visiting their website online. Almost half of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connections services, as opposed to over the phone or in the Internet. The Company has nearly 500 active agent locations, typically situated in retail locations such as convenience and check cashing stores. In Tennessee, Global Connection has arrangements in place with Kroger, BI-LO (Food Lion) and Ace Cash Express stores in over 195 locations.<sup>42</sup> Customers that enroll by calling Global Connection's customer service number are sent an application or certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with

---

<sup>42</sup> In addition, once enrolled, customers can make in-person payments at thousands of Western Union and Moneygram locations.

a copy of the prospective customer's proof of eligibility. Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail, along with a copy of the prospective customer's proof of eligibility.

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the FCC's rules.<sup>43</sup> All subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new section 54.409.<sup>44</sup> In addition, the Company will confirm that the subscriber is not already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service. Global Connection will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Lifeline rules, together with any additional state certification requirements.<sup>45</sup>

*F. Global Connection will comply with Authority and FCC requirements for fees, charges and reports*

Global Connection will comply with all applicable Authority and FCC requirements with respect to fees, charges and reports. The Company will timely pay all applicable federal,

---

<sup>43</sup> See 47 C.F.R. § 54.409.

<sup>44</sup> In a recent order, the FCC adopted a change to the list of programs that will qualify recipients for Lifeline service. These changes are scheduled to become effective on or after December 1, 2016. See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶¶ 167-216 (rel. Apr. 27, 2016) (Lifeline Modernization Order).

<sup>45</sup> See 2012 Lifeline Reform Order ¶ 61; see also 47 C.F.R. § 54.410(a). The Lifeline Modernization Order requires the creation of a National Lifeline Eligibility Verifier, with a target deadline of December 31, 2019 for all states. See Lifeline Modernization Order ¶ 164. Global Connection will utilize the National Verifier when it is available.

state and local regulatory fees, including universal service and 911/E911 fees.<sup>46</sup> In addition, Global Connection will comply with the FCC's annual reporting requirements for ETCs as set forth in section 54.422 of the FCC's rules.<sup>47</sup>

Global Connection will not collect service deposits for its plans and will not charge a number portability fee for Lifeline accounts.<sup>48</sup>

## **V. DESIGNATION OF GLOBAL CONNECTION AS AN ETC ON A WIRELINE BASIS IS IN THE PUBLIC INTEREST**

The FCC has identified factors that should be considered when determining whether designation of additional ETCs will serve the public interest and whether the benefits of an additional ETC would outweigh potential harms. These factors include the benefits of increased competitive choice, and the unique advantages of the applicant company's service offerings.<sup>49</sup> Global Connection affirms that its designation as an ETC in Tennessee would fully satisfy these criteria.<sup>50</sup>

First, at a time when the majority of new ETCs intend to provide Lifeline services only on a wireless basis, Global Connection proposes to make the Lifeline discount available as part of a wireline offering. This in itself will provide low-income Tennessee residents with

---

<sup>46</sup> See *TracFone Wireless, Inc. Application to Rescind State 911/E911 Condition*, FCC Docket No. 96-45 (May 3, 2010).

<sup>47</sup> See 47 C.F.R. § 54.422.

<sup>48</sup> See 47 CFR § 54.401(c), (e).

<sup>49</sup> See 47 U.S.C. § 54.202(c).

<sup>50</sup> Indeed, the FCC has held that designation of a competitive ETC solely to provide Lifeline services in non-rural areas is *per se* in the public interest. See *Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Memorandum Opinion and Order, DA 00-2895, ¶ 14 (2000). As discussed herein, however, designation of Global Connection is appropriate based on the merits of the Company's proposed Lifeline services.

an important choice in how they manage their telephone services as well as a quality alternative to the limited selection of wireline ETCs operating in Tennessee.

Further, the Company's proposed Tennessee Lifeline service offerings present uncommon advantages for prospective customers. Primary among these is the ability for customers to control their local telephone service costs by subscribing to a prepaid flat rate calling plan with which they can more effectively manage their communications costs. All of the Company's Lifeline plans include unlimited local calling. In addition, customers have the option to control their long distance costs by subscribing to plans that include a pre-set number of interexchange minutes of use each month, included in the monthly flat fee. State and federal regulators regularly note the frequency of consumer complaints regarding significant per-minute overage charges for long distance calling. The inclusion of domestic long distance telephone as part of several Global Connection flat rate service offerings provides consumers with long distance calling capability while enabling them to avoid the risks of incurring unexpected financially burdensome per-minute charges for such calling. At the same time, customers always have the flexibility to purchase additional long distance minutes at competitively low rates in the event that they have used all of their allotted plan minutes for a particular month.

Global Connection's Lifeline service offerings will also include a range of appealing features, enabling customers to select a plan that meets their needs.

Finally, designation of Global Connection will have a very limited effect upon the financial resilience of the federal Universal Service Fund (Fund). The Company is applying for ETC designation solely for the purpose of providing Lifeline discounts to qualified low-

income consumers and to seek reimbursement for the same. Global Connection will not seek or accept high-cost support.<sup>51</sup>

Because Lifeline support is designed to reduce the monthly cost of telecommunication services for eligible consumers, is distributed on a per-household basis, and is directly reflected in the price that the eligible household pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers. It is also important to recognize that a Lifeline-only ETC receives USF support *only* for the customers that it serves. In the event that such customers have migrated to Global Connection from another Lifeline provider, no additional support is required. The only change is to the identity of the carrier entitled to seek reimbursement. At the same time, all providers are required to contribute to the federal Universal Service Fund based upon their non-Lifeline interstate revenues. Thus, in the event that a customer previously without telephone service enrolls for Lifeline service, the additional revenue (not including the reimbursement) will result in additional contributions to the federal USF.

The FCC reaffirmed this position when it stated that “the potential growth of the fund associated with high-cost support distributed to competitive ETCs” is not relevant to carriers seeking support associated with the low-income program.<sup>52</sup> The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the Fund when it stated that “any increase in the size of the fund would be minimal and would

---

<sup>51</sup> As a result, designation of Global Connection as an ETC will not have an adverse effect (or any effect) on the growth in the high-cost portions of the USF. Similarly, it will neither create nor contribute to an erosion of high-cost funding available to any rural or non-rural telephone company.

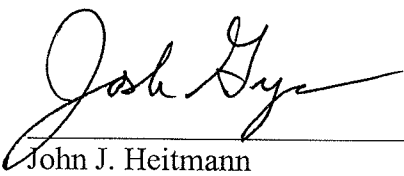
<sup>52</sup> See *Application of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, CC Docket No. 96-45, Order, FCC 05-165, ¶ 17 (2005) (*TracFone Forbearance Order*).

be outweighed by the benefit of increasing eligible participation in the Lifeline program, furthering the statutory goal of providing access to low-income consumers.”<sup>53</sup>

## VI. CONCLUSION

By this Petition, Global Connection asserts its willingness and ability to comply with all the rules and regulations that the Authority imposes upon ETCs to provide Lifeline service. Upon Staff request, Global Connection is prepared to answer questions or present additional testimony or other evidence about its services within the State of Tennessee.

Having demonstrated that Global Connection satisfies the conditions necessary for designation as an ETC in Tennessee, and having shown that the public and universal service interests of Tennessee consumers will be properly served, Global Connection respectfully requests that the Authority expeditiously designate Global Connection for the provision of low-income support on a wireline basis throughout its requested Designated Service Area in the State of Tennessee.

By   
\_\_\_\_\_  
John J. Heitmann  
Joshua T. Guyan  
Kelley Drye & Warren LLP  
3050 K Street, NW, Suite 400  
Washington, D.C. 20007  
Tel: (202) 342-8566  
Fax: (202) 342-8451  
Email: [jguyan@kelleydrye.com](mailto:jguyan@kelleydrye.com)

*Attorneys for Global Connection Inc. of America*

Date: July 14, 2016

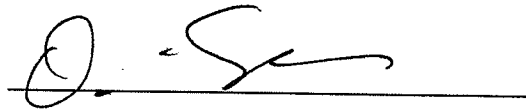
---

<sup>53</sup> *Id.*

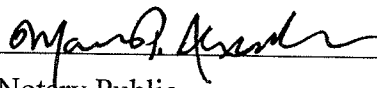
## VERIFICATION

STATE OF GEORGIA       §  
                                     §  
COUNTY OF GWINNET   §

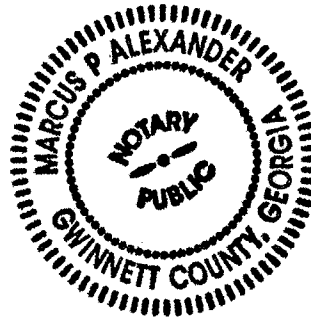
I, David Skogen, being first duly sworn under oath, depose and say that I am the Chief Executive Officer of Global Connection Inc. of America (Global Connection); that I am authorized to make this Verification on behalf of Global Connection; that I have read the foregoing Petition; that I know the contents thereof; and that the facts set forth in the foregoing Petition, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information and belief.



Subscribed and sworn to before me this 6<sup>th</sup> day of July, 2016.

  
\_\_\_\_\_  
Notary Public

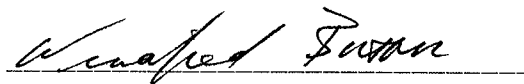
My Commission expires: April 3, 2020



## CERTIFICATE OF SERVICE

I, Winafred Brantl, do hereby certify that an original and four (4) copies, as well as an electronic copy, of the foregoing *Global Connection Inc. of America Petition for Designation as a Wireline Eligible Telecommunications Carrier in the State of Tennessee* are being delivered to the Tennessee Regulatory Authority as follows:

Chairman, Tennessee Regularity Authority  
c/o Sharla Dillon, Dockets and Records Manager  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

  
\_\_\_\_\_



## **EXHIBITS**

Exhibit A	2015 Letter from AT&T to Global Connection
Exhibit B	List of Wire Centers
Exhibit C	FCC Proposed Compliance Plan
Exhibit D	Management Qualifications

**Exhibit A**

**2015 Letter from AT&T to Global Connection**



September 29, 2015

VIA USPS CERTIFIED MAIL

Ed Smith  
VP of Finance  
Global Connection Inc. of America  
5555 Oakbrook Parkway  
Suite 620  
Norcross, Georgia 30093

Re: **AMENDED NOTIFICATION** *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Second Report and Order (\_\_\_ FCC Rcd \_\_\_)(*Lifeline Second Report and Order*) and Resale Agreement ("Agreement") between Global Connection Inc. of America ("CARRIER") and AT&T in the States of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee.

Dear Ed Smith:

This letter is written regarding the above referenced matter. On or about August 14, 2015, AT&T notified you regarding the recent Lifeline Order and the fact AT&T would cease selling Lifeline services on February 9, 2016. We have been notified by the FCC that the February 9, 2016 date was incorrect. The FCC has advised that the implementation date of the rules applicable to the resale of Lifeline/Linkup will be 180 days after Federal Register publication of Office of Management and Budget (OMB) approval ("Implementation Date"). AT&T will notify Carriers via Accessible letter when the Federal Register publication occurs and the Implementation Date of the rules.

For more information please see: <http://www.usac.org/li/tools/order/resale-of-lifeline.aspx>

Global Connection Inc. of America purchases Lifeline discounted wholesale services from AT&T for purposes of resale in one or more States where Global Connection Inc. of America operates, and as a result of the FCC's Lifeline Second Report and Order, an amendment to the Agreement is required. Pursuant to applicable provisions of your 9 State - Resale Agreement including, without limitation, terms related to changes of law, this letter constitutes an amended notice required from AT&T to amend the Agreement for the purpose of incorporating the rulings established by the *Lifeline Second Report and Order*, into the Agreement.

The FCC's rulings include: 1) eliminating any obligation AT&T previously had under section 251(c)(4) of the Act to offer for resale its Lifeline and/or Link-Up discounted retail offerings, and 2) eliminating any reimbursement to AT&T for any resold Lifeline and/or Link-Up services. Pursuant to these rulings, AT&T will stop providing resold Lifeline and Link-Up services in all jurisdictions on the Implementation Date. In addition, AT&T will eliminate the Lifeline discount on all existing resold Lifeline services on the Implementation Date.

AT&T will continue to provide discounted Lifeline service for resale and seek reimbursement from USAC for those lines until the Implementation Date. Global Connection Inc. of America should not seek reimbursement from USAC for any Lifeline wholesale service provided by AT&T.

You will still need to amend your contract to reflect the new Implementation Date. Mach Lora is your assigned Negotiator and can be reached at (214) 858-0702 or via email at p3730@att.com.

Sincerely,

*Notices Manager*

**Exhibit B**

**List of Wire Centers**

**Exhibit B**  
**Proposed List of Wire Centers**

ARTNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ARLINGTON
ATHNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ATHENS
BNTNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BENTON
BRSTTNXA	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	BRISTOL
BRSTTNXB	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	BRISTOL
BTLRTNXA	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	BUTLER
BWVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BROWNSVL
CHRLTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHARLOTTE
CHTNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHARLESTON
CLDGTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CUMBERLDGP
CLEVTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLEVELAND
CLMATNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	COLUMBIA
CLTNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLINTON
CLVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLARKSVL
CMDNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CAMDEN
CNHMTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CUNNINGHAM
CNVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CENTERVL
CRHTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CARTHAGE
CSVLTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	CROSSVILLE
CVTNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	COVINGTON
CXTNTNXA	CITIZENS TELECOM VOL ST LLC DBA FRONTIER VOL STATE	CLAXTON
DCTRTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DECATUR
DOVRTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DOVER
DYERTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DYER
DYTNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DAYTON
ELTNTNXA	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	ELIZABHTN
FKLNTNCC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKLIN
FKLNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKLIN
FRDNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FREDONIA
FRVWTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FAIRVIEW
FYVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FAYETTEVL
GBSNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GIBSON
GDJTTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GRAND JCT
GNBRTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENBRIER
GNFDTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENFIELD
GTWSTNSW	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
HDVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSNVL
HMBLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HUMBOLDT
HMPNTNXA	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	HAMPTON
HMPSTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HAMPSHIRE
HNNGTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENNING
HNSNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON
HNTGTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CEDARGROVE
HRFRTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEWPORT
HTVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARTSVILLE
JCSNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JACKSON
JCSNTNNS	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JACKSON

**Exhibit B**  
**Proposed List of Wire Centers**

JLLCTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JELICO
JNBOTNXA	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	JONESBORO
JSPRTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JASPER
KGTNTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KINGSTON
KNVLTNBE	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNOXVILLE
KNVLTNFC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNOXVILLE
KNVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNOXVILLE
KNVLTNWH	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNOXVILLE
KNVLTNYH	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNOXVILLE
LBNNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEBANON
LKCYTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAKE CITY
LRBGTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAWRENCEBG
LTHMTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	LATHAM
LWBGTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEWISBURG
LXTNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEXINGTON
LYBGTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYNCHBURG
LYVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYNNVILLE
MARTTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	MARTIN
MAVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNOXVILLE
MCKNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCKENZIE
MDTNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MIDDLETON
MDVITNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL
MDVLTNXA	CENTURYTEL OF ADAMSVILLE DBA CENTURYLINK-ADAMSVILL	MILLEDGEVL
MDWYTNXA	UNITED TELEPHONE-SOUTHEAST-TN DBA CENTURYLINK - TN	MIDWAY
MILNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MILAN
MMPHTNBA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNCK	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNCT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNEL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNFR	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNGT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNHP	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNOA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNSL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNST	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MMPHTNWW	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MEMPHIS
MNCHTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MANCHESTER
MNPLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTPLEASANT
MRBOTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MURFREESBO
MRTWTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORRISTOWN
MTRYTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	MONTEREY
NSVLTNAA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNAP	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNBH	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNBV	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE

**Exhibit B**  
**Proposed List of Wire Centers**

NSVLTNBW	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNCD	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNCH	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNDO	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNHH	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNIN	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNMC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNST	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNUN	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNWC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NSVLTNWM	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NASHVILLE
NWPTTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEWPORT
PARSTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PARIS
PLHLTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	PLEASANTHL
PLMYTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PALMYRA
PLSKTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELKTON
PTBGTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PETERSBURG
PTLDTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PORTLAND
RKWDTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROCKWOOD
RPLYTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RIPLEY
RRVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROGERSVL
RTLGTNXA	CITIZENS TELECOM VOL ST LLC DBA FRONTIER VOL STATE	RUTLEDGE
SHLHTNXA	CENTURYTEL OF ADAMSVILLE DBA CENTURYLINK-ADAMSVILL	SHILOH
SHRNTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	SHARON
SHVLTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHELBYVL
SPFDTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGFLD
SPRTTNXA	CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	SPARTA
SVNHTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SAVANNAH
SWTWTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SWEETWATER
TROYTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TROY
TRTNTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TRENTON
UNCYTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	UNION CITY
WHPITNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITE PINE
WHVLTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITEVILLE
WNCHTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER
WSBNTNXA	CITIZENS TELECOM VOL ST LLC DBA FRONTIER VOL STATE	WASHBURN
WVRLTNMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WAVERLY

**Exhibit C**

**FCC Amended Compliance Plan**



**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**WASHINGTON HARBOUR, SUITE 400**

**3050 K STREET, NW**

**WASHINGTON, D.C. 20007-5108**

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

JOHN HEITMANN

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

NEW YORK, NY  
LOS ANGELES, CA  
CHICAGO, IL  
STAMFORD, CT  
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES  
MUMBAI, INDIA

July 14, 2016

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Global Connection Inc. of America Revised Wireline Compliance Plan;  
WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On June 26, 2012, Global Connection Inc. of America (Global Connection or Company) submitted its Compliance Plan for wireline Lifeline services, outlining the measures it would take to implement the conditions imposed by the Commission in its 2012 Lifeline Reform Order.<sup>1</sup> Following revisions on September 17, 2012, the plan remains pending.

The Company has an approved wireless Compliance Plan, originally filed on March 8, 2012 and most recently revised on April 30, 2012. The Wireline Competition Bureau (Bureau) approved Global Connection's wireless Compliance Plan on May 25, 2012.<sup>2</sup>

As discussed below, Global Connection seeks approval of a wireline Compliance Plan in order to ensure continuity of service to customers currently served through resale of the Lifeline services of an underlying eligible telecommunications carrier (ETC). On April 1, 2016, Global Connection initially sought expedited approval within thirty days of amendments to its approved

<sup>1</sup> See *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 (Feb. 6, 2012) (2012 Lifeline Reform Order).

<sup>2</sup> See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

Marlene H. Dortch, Secretary  
July 14, 2016  
Page Two

wireless Compliance Plan. These amendments updated the approved Compliance Plan to: (1) reflect a proposed change in ownership of the Company;<sup>3</sup> (2) include Global Connection's wireline Lifeline services; and (3) update the information provided in the approved Compliance Plan due to the passage of time. On June 3, 2016, the Company submitted an updated Amended Compliance Plan to remove discussion of the proposed change to the ownership structure of the Company and reflect certain references to the Lifeline Modernization Order released on April 27, 2016.<sup>4</sup>

Pursuant to discussions with Bureau staff, Global Connection hereby submits a revised version of its pending wireline Compliance Plan, updating the information provided therein to reflect the passage of time.

#### *Wireline Lifeline Operations*

Global Connection has operated as a provider of domestic and international wireline telecommunications services since 1998. The Company currently provides prepaid wireline local exchange and long distance services to residential customers in 26 states.<sup>5</sup> The Company is designated as an ETC to provide Lifeline services to low-income consumers on a wireline basis in seven states<sup>6</sup> where it has held these designations since before the 2012 Lifeline Reform Order. Global Connection also makes wireline Lifeline services available in eleven states where it does not hold a wireline ETC designation by reselling AT&T Lifeline service.<sup>7</sup>

Global Connection is dedicated to growing its wireline operations. Indeed, Global Connection is near the completion of a transaction through which it has acquired approximately

---

<sup>3</sup> The proposed change in ownership of Global Connection to Global Reconnect and Stan McCright was subsequently cancelled. See Notice of Decision Not to Consummate Transaction, File No. ITC-T/C-20160204-00048; WC Docket No. 16-30 (June 3, 2016).

<sup>4</sup> See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (Lifeline Modernization Order).

<sup>5</sup> Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, North Carolina, Nebraska, New Mexico, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, Washington, Wisconsin, and West Virginia.

<sup>6</sup> Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina.

<sup>7</sup> Illinois, Indiana, Kansas, Kentucky, Mississippi, Missouri, Ohio, South Carolina, Tennessee, Texas and Wisconsin.

Marlene H. Dortch, Secretary  
July 14, 2016  
Page Three

8,700 wireline (Lifeline and non-Lifeline) customers in 19 states from Budget Prepay, Inc.<sup>8</sup> At this time, the Company provides wireline Lifeline service to approximately 10,420 subscribers. In a market increasingly turning to mobile services, Global Connection's continued provision of wireline Lifeline service represents a rare and significant choice in service providers for low-income consumers.

The Company's continued ability to provide wireline Lifeline services to many of its current customers depends upon expeditious review and approval of this revised Compliance Plan. Nearly 5,000 of the Company's wireline Lifeline customers, located in 11 states, are served by the Company through resale of an underlying carrier's Lifeline services. In the Lifeline Second Report and Order released on June 22, 2015, the Commission determined "that only ETCs that provide Lifeline service directly to subscribers will be eligible for reimbursement from the Fund."<sup>9</sup> The Commission provided a 180-day transition period following the effective date of the order "during which non-ETC resellers may...obtain ETC status...."<sup>10</sup> That transition period ends on August 15, 2016 by which time Global Connection must have obtained ETC designations to continue to serve wireline Lifeline customers in these 11 states or must have completed the necessary procedures to discontinue provision of Lifeline discounts to those customers, which may require regulatory approvals and/or advance notice (as much as 60 days ahead).

***Approval of this Compliance Plan is a requirement to obtain that approval – and in many states is a threshold ("gating") requirement even to file the ETC designation petition.*** Consequently, to comply with the Commission's determination in the Second Report and Order that all Lifeline customers shall be served directly by designated ETCs (and not by Lifeline resale), and at the same time avoid terminating essential Lifeline discounts for thousands of subscribers, ***Global Connection requests expeditious approval of the enclosed Compliance Plan.***

---

<sup>8</sup> See Domestic Section 214 Application Filed for the Acquisition of Certain Assets of Budget PrePay, Inc. d/b/a Budget Phone by Global Connection Inc. of America, Notice of Domestic Section 214 Authorization Granted, WC Docket. No. 15-258 (Nov. 30, 2015).

<sup>9</sup> Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) (Second Report and Order or Order on Reconsideration).

<sup>10</sup> Id. This portion of the Order has been approved by the Office of Management and Budget and was published in the Federal Register on February 17, 2016. See 81 Fed. Reg. 7999 (Feb. 17, 2016).

Marlene H. Dortch, Secretary  
July 14, 2016  
Page Four

Compliance Plan Updates Due to the Passage of Time

The proposed Compliance Plan has been revised to update the details of Global Connection's wireline operations and Lifeline ETC designations (see pp. 2-3). It also incorporates revisions to Company procedures to reflect changes to Lifeline program rules since May 2012. On pages 6-8, Global Connection provides updates regarding its enrollment process. On page 10, the Company discusses compliance with the new rule requiring retention of proof of eligibility documentation. On pages 11-12, Global Connection commits to de-enrolling customers at their request within two business days. On pages 15-16, the Company updates its annual recertification practices, including sending educational messages about the recertification requirement. On pages 19-20, the Company discusses compliance with the new FCC Form 497 snapshot rule for reimbursements and updates references to the annual ETC filing requirements. On page 10, the Company includes a description of how it "deals directly" with applicants through use of a real-time review queue. On page 17, Global Connection describes how it interacts with the National Lifeline Accountability Database (NLAD) and eliminates language due to the phase out of the in-depth validation (IDV) process.<sup>11</sup> Further, the discussions of enrollment and eligibility determination procedures in Section I.B. have been updated and expanded. Current exhibit materials for the Company's wireline Lifeline operations (marketing materials, sample enrollment form, income eligibility worksheet) are included.

Summary

Global Connection hereby submits its proposed wireline Compliance Plan with the above-described revisions. The Company respectfully reiterates its request for expeditious approval of its Compliance Plan in order to ensure continued provision of wireline Lifeline services as discussed herein.

---

<sup>11</sup> The language regarding cooperating with in-depth validation audits was on pages 17-18 of the revised Compliance Plan as submitted on September 17, 2012.

**KELLEY DRYE & WARREN LLP**

Marlene H. Dortch, Secretary  
July 14, 2016  
Page Five

This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann  
Joshua T. Guyan

*Counsel to Global Connection Inc. of America*

cc: Ryan Palmer  
Jodie Griffin  
Nathan Eagan

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

**GLOBAL CONNECTION INC. OF AMERICA WIRELINE SERVICE COMPLIANCE PLAN**

Global Connection Inc. of America (Global Connection or the Company),<sup>1</sup> through its undersigned counsel, hereby respectfully submits and requests expeditious approval of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its 2012 Lifeline Reform Order and 2015 Lifeline Second Report and Order for its wireline service.<sup>2</sup> On March 8, 2012, Global Connection separately filed a Compliance Plan for its wireless services, which was most recently revised and re-filed on April 30, 2012. Global

---

<sup>1</sup> The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Real Home Phone (trade name), and Global Connection Holdings Corporation (holding company). This Compliance Plan applies only to Global Connection's wireline Lifeline service offerings.

<sup>2</sup> See *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 Nos. 11-42, 03-109, 12-23, CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (2012 Lifeline Reform Order). See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 ¶ 249 (rel. June 22, 2015) (Second Report and Order, Order on Reconsideration or Lifeline Second FNPRM). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012)(Compliance Plan Public Notice).

Connection's wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.<sup>3</sup>

Global Connection provides wireless service in 24 territories<sup>4</sup> and prepaid wireline local exchange and long distance services to residential customers in 26 states.<sup>5</sup> Global Connection currently provides wireline Lifeline service directly to low-income customers in seven states where it has held a wireline eligible telecommunications carrier (ETC) designation since before the 2012 Lifeline Reform Order.<sup>6</sup> In addition, Global Connection provides wireline Lifeline service indirectly to low-income customers in eleven states where it does not hold a wireline ETC designation by reselling AT&T Lifeline service.<sup>7</sup> Further, Global Connection is in the process of acquiring additional wireline Lifeline customers in one of these eleven states. It will serve these Lifeline customers indirectly by reselling AT&T Lifeline service until its ETC designations are granted or it must cease providing Lifeline discounts. In total, Global Connection currently provides wireline Lifeline service to approximately 10,420 subscribers and is completing the acquisition of another 236 wireline Lifeline customers from Budget Prepay. 4,858 of these Lifeline customers, located in 11 states, are served by the Company through resale

---

<sup>3</sup> See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-828 (2012).

<sup>4</sup> Those 24 territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

<sup>5</sup> Those 26 states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, North Carolina, Nebraska, New Mexico, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, Washington, Wisconsin, and West Virginia. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

<sup>6</sup> Those states are Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina.

<sup>7</sup> Those states are Illinois, Indiana, Kansas, Kentucky, Missouri, Mississippi, Ohio, South Carolina, Tennessee, Texas and Wisconsin.

of an underlying carrier's Lifeline services.

In the Lifeline Second Report and Order released on June 22, 2015, the Commission determined "that only ETCs that provide Lifeline service directly to subscribers will be eligible for reimbursement from the Fund."<sup>8</sup> The Commission provided a 180-day transition period following the effective date of the order "during which non-ETC resellers may...obtain ETC status...."<sup>9</sup> Global Connection is in the process of applying for ETC designation in the states where it is necessary to continue to serve its customers. However, in order for the states to grant a wireline ETC designation to Global Connection (and in many cases accept or review a petition), the Bureau must first approve this Compliance Plan. Therefore, to effectuate the Commission's desire in the Second Report and Order to have all Lifeline customers served directly by designated ETCs (and not by Lifeline resale), and avoid terminating essential Lifeline service to thousands of subscribers, Global Connection requests that the Bureau expedite approval of this Compliance Plan, which already has been pending for more than four years.<sup>10</sup>

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the

---

<sup>8</sup> *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 ¶ 249 (rel. June 22, 2015) (Second Report and Order or Order on Reconsideration).

<sup>9</sup> *Id.*

<sup>10</sup> This Compliance Plan has been pending since June 26, 2012.



facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an ETC in the Lifeline program.<sup>11</sup>

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order, the Second Report and Order, as well as with the Commission's Lifeline rules and policies more generally.<sup>12</sup> This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that Global Connection has taken to implement the obligations contained in the 2012 Lifeline Reform Order, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

### **ACCESS TO 911 AND E911 SERVICES**<sup>13</sup>

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of

---

<sup>11</sup> See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

<sup>12</sup> Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

<sup>13</sup> See Compliance Plan Public Notice at 3.

activation status and availability of minutes; and (2) 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.<sup>14</sup> The Company complies with the Commission's 911 and E911 requirements for its wireline services, however, the handset requirement is not applicable to Global Connection's wireline services.

The Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers. These underlying carriers route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

**E911-Compliant Handsets.** As discussed above, this requirement does not apply to Global Connection's wireline services.

---

<sup>14</sup> See 2012 Lifeline Reform Order ¶ 373.

## **COMPLIANCE PLAN**

### **I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE<sup>15</sup>**

#### **A. Policy**

Global Connection complies with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers are required to demonstrate eligibility based at least on: (1) household income at or below 135 percent of the Federal Poverty Guidelines for a household of that size;<sup>16</sup> or (2) the household's participation in one of the federal assistance programs listed in sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below and through use of the National Lifeline Accountability Database (NLAD), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

#### **B. Eligibility Determination**

Customers can enroll in Global Connection's wireline Lifeline service in-person, by calling the Company's customer service center or online. Approximately 40 percent of the Company's customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly 500 active agent locations, generally at retail locations such as convenience and check cashing

---

<sup>15</sup> See Compliance Plan Public Notice at 3.

<sup>16</sup> Some states set the household income threshold higher. Global Connection adheres to the standard set in each state, as long as the Commission's Lifeline rules allow.

stores.<sup>17</sup> All agents enrolling Lifeline customers for Global Connection have a portal login, which allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

At such locations, Global Connection may require prospective customers to show a valid government-issued photo identification<sup>18</sup> and the address is checked against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.<sup>19</sup>

Customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers can also enroll by printing an application online to complete and sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the 2012 Lifeline Reform Order and this Compliance Plan,

---

<sup>17</sup> Global Connection does not enroll Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

<sup>18</sup> Any identification documentation collected, including documentation used in NLAD processes to verify identity is retained pursuant to the Order on Reconsideration. *See Order on Reconsideration* ¶ 224, *supra* n. 2 at p. 1.

<sup>19</sup> *See infra* Section I.F. regarding use of the NLAD.

including the one-per-household requirement, and are told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of acceptable documents to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.<sup>20</sup> All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.<sup>21</sup> Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's

---

<sup>20</sup> See 2012 Lifeline Reform Order ¶ 100; 47 C.F.R. § 54.410(b)(1)(i)(B), 47 C.F.R. § 54.410(c)(1)(i)(B).

<sup>21</sup> See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

participation in a qualifying state, federal or Tribal program.<sup>22</sup>

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.<sup>23</sup> If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.<sup>24</sup>

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income or program-based criteria by checking the appropriate box on the application form.<sup>25</sup> In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Company complies with the new requirement to retain and protect proof of eligibility.<sup>26</sup> Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of

---

<sup>22</sup> See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>.

<sup>23</sup> See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. § 54.410(b)(1)(i)(B).

<sup>24</sup> See *id.*

<sup>25</sup> See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. §§ 54.410(b)(1)(iii), 54.410(c)(1)(iii).

<sup>26</sup> See Order on Reconsideration ¶ 221, *supra* n. 2 at p. 1.; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel. In addition, a Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on an FCC Form 497 for reimbursement.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.<sup>27</sup>

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[l]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"<sup>28</sup> Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the applicant and including that customer on an

---

<sup>27</sup> See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, FCC 05-165 ¶19 (2005).

<sup>28</sup> 2012 Lifeline Reform Order ¶ 110.

FCC Form 497 for reimbursement. The Company will therefore always “deal directly” with its customers to certify and verify the customer’s Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber 30 days to demonstrate continued eligibility.<sup>29</sup> A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

Although not currently required by the Commission’s rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two business days.<sup>30</sup> Customers can make this request by calling the Company’s customer service number and will not be required to submit any documents. Customers can call customer service by dialing 1-877-511-3009 from any phone. Live customer service and bilingual operators can currently be reached from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays.

### **C. Subscriber Certifications for Enrollment**

Global Connection will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the 2012 Lifeline Reform Order, together with any additional state certification

---

<sup>29</sup> See *id.* ¶ 143; 47 C.F.R. § 54.405(e)(1).

<sup>30</sup> See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 ¶ 421 (rel. Apr. 27, 2016).



requirements.<sup>31</sup> The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.<sup>32</sup> Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.<sup>33</sup> Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.<sup>34</sup>

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment

---

<sup>31</sup> 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

<sup>32</sup> See Model Application/Certification Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

<sup>33</sup> See Income Eligibility Worksheet, included as Exhibit B.

<sup>34</sup> See 2012 Lifeline Reform Order ¶ 123.

from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.<sup>35</sup>

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.<sup>36</sup>

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient<sup>37</sup>); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>38</sup>

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,<sup>39</sup> the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the

---

<sup>35</sup> See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

<sup>36</sup> See 47 C.F.R. § 54.405(c).

<sup>37</sup> See 2012 Lifeline Reform Order ¶ 87.

<sup>38</sup> See 47 C.F.R. § 54.410(d)(2).

<sup>39</sup> See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

Company within 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 applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may 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 the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included above and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.<sup>40</sup> The applicant must also authorize the Company to release any records required for the administration of the Company

---

<sup>40</sup> See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

Lifeline credit program, including to USAC to be used in a Lifeline program database.<sup>41</sup>

#### **D. Annual Verification Procedures**

Global Connection annually re-certifies all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>42</sup> Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled from the program.<sup>43</sup>

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.<sup>44</sup> The Company sends a single written notice explaining that failure to respond to the re-certification request within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the 30 days, the Company de-enrolls the subscriber within five business days.<sup>45</sup>

---

<sup>41</sup> See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

<sup>42</sup> See 2012 Lifeline Reform Order ¶ 120.

<sup>43</sup> See *id.* ¶ 145.

<sup>44</sup> See *id.* ¶ 142; 47 C.F.R. § 54.54.405(e)(4).

<sup>45</sup> Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification

#### **E. Activation and Non-Usage**

Global Connection's wireline service offerings are prepaid and the Company does assess and collect a monthly fee from each wireline subscriber. Each customer is required to prepay for the Lifeline service offering chosen each month or the service is disconnected. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.<sup>46</sup>

#### **F. Additional Measures to Prevent Waste, Fraud and Abuse**

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

Database. The Company complies with the requirements of the NLAD and section 54.404 of the Commission's rules. As such, the Company queries the NLAD for every enrollment<sup>47</sup> to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.<sup>48</sup>

---

efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

<sup>46</sup> See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

<sup>47</sup> With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

<sup>48</sup> See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.* ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber's information in the NLAD within ten business

In addition to checking the NLAD, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every 90 days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household<sup>49</sup> through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company’s Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.<sup>50</sup> If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the

---

days of any change, except for de-enrollment, which will be transmitted within one business day. *See* 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

<sup>49</sup> A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. *See* 2012 Lifeline Reform Order ¶ 74; 47 C.F.R. § 54.400(h).

<sup>50</sup> *See* 2012 Lifeline Reform Order ¶ 78.

following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).<sup>51</sup>

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and the ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).<sup>52</sup> These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.<sup>53</sup> This specifically includes

---

<sup>51</sup> *Id.* The USAC worksheet is available at <http://www.lifelinesupport.org/ls/eligibility/default.aspx#household>.

<sup>52</sup> See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

<sup>53</sup> See *id.* ¶ 275; 47 C.F.R. § 54.405(c).

the Company's website ([www.ConnectWithGlobal](http://www.ConnectWithGlobal)) and outdoor signage.<sup>54</sup> A sample of the Company's marketing materials is included as **Exhibit C**. In addition, the Company's application/certification forms will state that 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.

#### **G. Company Reimbursements from the Fund**

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.<sup>55</sup> Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision of Lifeline support when the revised Section 54.407 goes into effect.<sup>56</sup> In addition, the Company will keep accurate records as directed by USAC<sup>57</sup> and as required by section 54.417 of the Commission's rules.

#### **H. Annual Company Certifications**

The Company submits an annual FCC Form 481 filing to the Commission by July 1<sup>st</sup> of each year, certifying the Company's business and affiliate information, and terms and conditions

---

<sup>54</sup> See *id.* ¶ 275; 47 C.F.R. § 54.405(c).

<sup>55</sup> See *id.* ¶ 128; 47 C.F.R. § 54.407(d).

<sup>56</sup> See Second Report and Order ¶¶ 238-243, *supra* n. 2 at p. 1. Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

<sup>57</sup> See 47 C.F.R. § 54.407(e).



of any voice telephony plans offered to Lifeline subscribers.<sup>58</sup> The Company also submits an annual Form 555 filing to the Commission, certifying under penalty of perjury that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; and (2) that the Company is in compliance with all federal Lifeline certification procedures.<sup>59</sup> The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, annually by January 31<sup>st</sup>, for its certification efforts of the previous year.<sup>60</sup>

## **II. Description of Lifeline Service Offerings<sup>61</sup>**

Global Connection will offer its prepaid wireline Lifeline service in the study areas in the states where it is designated as an ETC<sup>62</sup> and throughout the coverage area of its underlying provider(s). The Company's Lifeline offerings vary based on the underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas and offers a Lifeline-discounted Basic Package<sup>63</sup> for \$20.70<sup>64</sup>, an Advantage Package<sup>65</sup> for \$25.70 and a Premium Package<sup>66</sup> for \$30.70 to eligible Lifeline customers. Global Connection resells

---

<sup>58</sup> See 47 C.F.R. § 54.422.

<sup>59</sup> See 47 C.F.R. § 54.416(a).

<sup>60</sup> See 47 C.F.R. § 54.416(b).

<sup>61</sup> See Compliance Plan Public Notice at 3.

<sup>62</sup> Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina.

<sup>63</sup> The Basic Package includes unlimited local calling, 911 and a published phone number.

<sup>64</sup> That rate, and all rates provided in this section, reflect the Lifeline discount.

<sup>65</sup> The Advantage Package adds to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

<sup>66</sup> The Premium Package adds to the Advantage Package: Three-Way Calling, Call Forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas and offers a Lifeline-discounted Basic Package<sup>67</sup> for \$32.95 and an Advantage Package<sup>68</sup> for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia, Kentucky, North Carolina, South Carolina and Texas and offers a Lifeline-discounted Basic Package<sup>69</sup> for \$36.70 and an Advantage Package<sup>70</sup> for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas and offers a Lifeline-discounted Basic Package<sup>71</sup> for \$36.70 and an Advantage Package<sup>72</sup> for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website [www.ConnectWithGlobal.com](http://www.ConnectWithGlobal.com).

### **III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation<sup>73</sup>**

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical

---

<sup>67</sup> The Basic Package includes unlimited local calling, 911 and a published phone number.

<sup>68</sup> The Advantage Package adds to the Basic Package: Caller ID and Call Waiting.

<sup>69</sup> The Basic Package includes unlimited local calling, 911 and a published phone number.

<sup>70</sup> The Advantage Package adds to the Basic Package: Caller ID and Call Waiting.

<sup>71</sup> The Basic Package includes unlimited local calling, 911 and a published phone number.

<sup>72</sup> The Advantage Package adds to the Basic Package: Caller ID and Call Waiting.

<sup>73</sup> See Compliance Plan Public Notice at 3.

capability to comply with the Commission's Lifeline service requirements.<sup>74</sup> The Compliance Plan Public Notice requires that a carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services, which represent nearly a quarter of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursements for the Company's operating revenues. Global Connection also has access to capital from its investors. Through its interests in Global Holdings, the majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Moreover, one of the Company's minority investors, Banyan Investments, a Florida mezzanine investment firm, has made and continues to make additional funding available as needed.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in twenty-seven jurisdictions. Moreover, the Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection's long-time management team brings together expertise in the telecommunications compliance field and

---

<sup>74</sup> See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 47 C.F.R. § 54.202(a)(4)).

specific in-depth knowledge of Global Connection with which to guide the Company's decisions going forward and its adherence to this revised Compliance Plan. The combination of Global Connection's proven telecommunications capabilities and the business expertise and financial support of the Company's investors will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies. Both are necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low-Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.<sup>75</sup> Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."<sup>76</sup> Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.<sup>77</sup> The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an

---

<sup>75</sup> See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as Exhibit D.

<sup>76</sup> Compliance Plan Public Notice at 3.

<sup>77</sup> See 47 C.F.R. § 54.202(a)(1).

ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings, included in Section II *supra*, provide its customers with unlimited minutes of use for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911 compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services.

Finally, Global Connection provides toll limitation service (TLS) to its Lifeline customers at no cost, which allows low-income consumers to avoid unexpected toll charges.<sup>78</sup> The Company's Lifeline wireline offerings include unlimited local calling and some plans include prepaid long distance minutes. All customers can purchase unlimited domestic long distance for \$10.00 per month or 250 minutes of domestic long distance for \$5.00 per month. Customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection's long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

#### **IV. Conclusion**

Global Connection submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's 2012 Lifeline Reform Order, the Compliance Plan Public Notice and

---

<sup>78</sup> See 2012 Lifeline Reform Order ¶ 230.

the Lifeline rules. Further, approval of this Compliance Plan is necessary to allow Global Connection to obtain the ETC designations necessary to effectuate the Commission's desire in the Second Report and Order to have all Lifeline customers served directly by designated ETCs (and not by Lifeline resale), and avoid terminating essential Lifeline service to thousands of subscribers. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



---

John J. Heitmann  
Joshua T. Guyan  
Kelley Drye & Warren LLP  
3050 K Street, NW  
Suite 400  
Washington, D.C. 20007  
(202) 342-8544

*Counsel to Global Connection Inc. of America*

July 14, 2016

**Exhibit A**

**Model Application/Certification Form**

---

# Global Connection Inc. of America

Tel: 1-877-511-3009 • Fax: 1-888-878-9323  
P.O. Box 48269 Atlanta, GA 30362-1269



## WIRELINE LIFELINE SERVICE APPLICATION AND CERTIFICATION GEORGIA

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

**One Lifeline service per household disclosures:** Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

☒ I hereby certify, under penalty of perjury, that I have read and understood the disclosures listed above. ☒ I hereby certify, under penalty of perjury, that to the best of my knowledge, my household is not already receiving a Lifeline service benefit. ☐ I hereby certify that I am receiving Lifeline benefits from another carrier; however, with this application I would like to transfer my benefits to Global Connection. I understand the change will change my existing telephone phone number.

**Customer eligibility certification:** I hereby certify that I participate in at least one of the following programs (check one):

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)        | <input type="checkbox"/> Senior citizen low-income discount plan offered by the local gas or power company |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP)    |  |
| <input type="checkbox"/> Medicaid (not Medicare)                            | <input type="checkbox"/> National School Lunch Program (free program only)     |  |
| <input type="checkbox"/> Supplemental Security Income (SSI)                 | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines |  |

☐ **Tribal eligibility:** I hereby certify that I reside on Federally-recognized Tribal lands. Unresolved questions or complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 1-800-282-5813.

### Customer Application Information:

First Name \_\_\_\_\_ Middle Name \_\_\_\_\_ Last Name \_\_\_\_\_

Date of Birth: Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_ Last Four Digits of Social Security Number or Tribal ID Number: \_\_\_\_\_

If Qualifying for Lifeline by Income, number of Individuals in Household: \_\_\_\_\_ Home Telephone Number (if available) : \_\_\_\_\_

Residential Address (P.O. Box NOT sufficient) Address is (choose one): ☐ Permanent ☐ Temporary Contact Number \_\_\_\_\_

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) Email: \_\_\_\_\_

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

### Multiple households sharing an address:

☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses.

☐ **Letter of Authorization:** This letter is a written authorization, to designate Global Connection Inc. of America to act as my agent in order to change the following: long distance carrier from my current telecommunications carrier to Global Connection Inc. of America long distance service, local exchange carrier from my current telecommunications carrier to Global Connection Inc. of America, I am authorized to request changes on this account. I further understand that there may be a charge for each provider change and could involve a charge for the changing back to the original primary carrier. Subscribers selecting the electronic signature option and or the IVR (Interactive Voice Response) to be considered a "writing", any name or symbol of subscriber affixed to or contained in the electronic Letter of Authorization shall be deemed to be the Subscriber's valid signature expressing intent to be bound to this Letter of Authorization and the applicable tariffs.

### Authorizations:

☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program ( name, telephone number and address, DOB, last four digits of SSN or Tribal ID, amount of support sought, means of qualification, dates of service initiation/termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

### If Qualifying person is different (Example: Child on School Lunch):

#### Name of qualifying individual

(if different than applicant; if different see Additional Certifications):

☐ The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

### Additional certifications. I hereby certify, under penalty of perjury, that (Check the box next to each line):

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed is my primary residence, not a second home or business
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge.

### Applicant's Signature:

Date:

**FOR AGENT USE ONLY** (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

#### Documents Acceptable Proof for Income-Eligibility (check 1):

- |  |  |  |   |
|--|--|--|---|
| <input type="checkbox"/> The prior year's state, federal, or Tribal tax return,      | <input type="checkbox"/> A Veterans Administration statement of benefits,              | <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or                | If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months. |
| <input type="checkbox"/> Current income statement from an employer or paycheck stub, | <input type="checkbox"/> A retirement/pension statement of benefits                    | <input type="checkbox"/> A divorce decree, child support award, or other official document containing income info. |   |
| <input type="checkbox"/> A Social Security statement of benefits,                    | <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, |  |   |

#### Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

##### List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)

- ☐ Senior citizen low-income discount plan offered by the local gas or power company
- ☐ National School Lunch Program (free program only)

##### List B - Choose 1:

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation \_\_\_\_\_

Last 4 digits of Doc / ID# from List B

Date of Proof Document: \_\_\_\_\_

Expiration Date of Proof Document: \_\_\_\_\_

Applicant  
Account  
Number:

Agent/Dealer  
Number:



**Exhibit B**

**Income Eligibility Worksheet**

---

**AZ, KS, MI, NM, OH, TX & VT\***

Individuals are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 150% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

\*Vermont individuals over the age of 65.

HOUSEHOLD SIZE	INCOME LEVEL
1	\$17,820
2	\$24,030
3	\$30,240
4	\$36,450
5	\$42,660
6	\$48,870
7	\$55,095
8	\$61,335
For each additional person	Add \$6,240

**All Other Contiguous States and DC\*\***

Individuals in these states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

\*\*Excluding CA.

HOUSEHOLD SIZE	INCOME LEVEL
1	\$16,038
2	\$21,627
3	\$27,216
4	\$32,805
5	\$38,394
6	\$43,983
7	\$49,586
8	\$55,202
For each additional person	Add \$5,616

**Applicants must list the number of individuals in the applicant's household on the Lifeline application form.** Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- The prior year's state, federal, or Tribal tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document
- If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months

**This is a Lifeline service provided by Global Connection Inc. of America. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.**

**IMPORTANT**

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits. Eligible lifeline subscribers are offered our lowest basic wireline plan of \$20.70 per month plus taxes & fees in the AT&T area only.

**LIFELINE WIRELINE SERVICE INFORMATION:****LIFELINE ELIGIBILITY CRITERIA**

Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, CA, KS, MI, NM, OH, TX, VT
Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, WA, WV, WI, WY.	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY	

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public  
Utilities Commission  
Consumer Affairs at  
303-894-2070 or  
800-456-0858

Georgia Public Service  
Commission's Consumer  
Affairs Unit at  
404-656-4501 or  
800-282-5813

Kansas Commission's  
Office of Public Affairs  
and Consumer Protection  
at 785-271-3140 or  
800-662-0027  
TDD 800-766-3777

Massachusetts Consumer  
Division Dept. of  
Telecommunications &  
Cable 617-305-3531 or  
800-392-6066

Global Connection Inc. of America

Income Eligibility WS RHP GEN REV004-010516

**Exhibit C**  
**Marketing Materials**

---

GREAT  
LIMITED  
TIME OFFER  
**ACT NOW!**

SAY HELLO TO  
REAL HOME PHONE

**BIG  
\$SAVINGS\$**

First Month

~~\$38.45~~ **FREE!**\*

**LIFELINE**

**ADVANTAGE PACKAGE**

• Caller ID • Call Waiting • 100 Minutes Long Distance  
• Unlimited Local • Emergency 911 Access

**\$25.70\*** Per Month

**UNLIMITED  
LONG DISTANCE MINUTES**

**\$10**

Easy 1+ dialing.  
NO ACCESS  
CODE REQUIRED

We proudly accept Global Connection Real Home Phone Service payments

- ✓ **Unlimited Local Calls**
- ✓ **No Credit Check**
- ✓ **Great Plans**
- ✓ **No Contract**
- ✓ **No Deposit**

If you receive Government supported services such as Food Stamps, SSI or Medicaid, you may be eligible for a **Lifeline Discount** on your home telephone service.

**See back for contact information.**  
Hablamos español



RHP Agent flyer REV001-000915

\*Restrictions apply. Go to [www.RealHomePhone.com](http://www.RealHomePhone.com) for details. AT&T service only. Includes qualified Lifeline Discount. Plus Taxes fees and surcharges. For Lifeline eligible customers only.



**Real  
HOME  
PHONE  
SERVICE.**

[www.RealHomePhone.com](http://www.RealHomePhone.com)  
Service provided by Global Connection Inc.

GREAT  
LIMITED  
TIME OFFER  
**ACT NOW!**

SAY HELLO TO  
REAL HOME PHONE

**BIG  
\$SAVINGS\$**

First Month

~~\$38.45~~ **FREE!**\*

**LIFELINE**

**ADVANTAGE PACKAGE**

• Caller ID • Call Waiting • 100 Minutes Long Distance  
• Unlimited Local • Emergency 911 Access

**\$25.70\*** Per Month

**UNLIMITED  
LONG DISTANCE MINUTES**

**\$10**

Easy 1+ dialing.  
NO ACCESS  
CODE REQUIRED

We proudly accept Global Connection Real Home Phone Service payments

- ✓ **Unlimited Local Calls**
- ✓ **No Credit Check**
- ✓ **Great Plans**
- ✓ **No Contract**
- ✓ **No Deposit**

If you receive Government supported services such as Food Stamps, SSI or Medicaid, you may be eligible for a **Lifeline Discount** on your home telephone service.

**See back for contact information.**  
Hablamos español



RHP Agent flyer REV001-000915

\*Restrictions apply. Go to [www.RealHomePhone.com](http://www.RealHomePhone.com) for details. AT&T service only. Includes qualified Lifeline Discount. Plus Taxes fees and surcharges. For Lifeline eligible customers only.



**Real  
HOME  
PHONE  
SERVICE.**

[www.RealHomePhone.com](http://www.RealHomePhone.com)  
Service provided by Global Connection Inc.

GREAT  
LIMITED  
TIME OFFER  
**ACT NOW!**

SAY HELLO TO  
REAL HOME PHONE

**BIG  
\$SAVINGS\$**

First Month

~~\$38.45~~ **FREE!**\*

**LIFELINE**

**ADVANTAGE PACKAGE**

• Caller ID • Call Waiting • 100 Minutes Long Distance  
• Unlimited Local • Emergency 911 Access

**\$25.70\*** Per Month

**UNLIMITED  
LONG DISTANCE MINUTES**

**\$10**

Easy 1+ dialing.  
NO ACCESS  
CODE REQUIRED

We proudly accept Global Connection Real Home Phone Service payments

- ✓ **Unlimited Local Calls**
- ✓ **No Credit Check**
- ✓ **Great Plans**
- ✓ **No Contract**
- ✓ **No Deposit**

If you receive Government supported services such as Food Stamps, SSI or Medicaid, you may be eligible for a **Lifeline Discount** on your home telephone service.

**See back for contact information.**  
Hablamos español



RHP Agent flyer REV001-000915

\*Restrictions apply. Go to [www.RealHomePhone.com](http://www.RealHomePhone.com) for details. AT&T service only. Includes qualified Lifeline Discount. Plus Taxes fees and surcharges. For Lifeline eligible customers only.



**Real  
HOME  
PHONE  
SERVICE.**

[www.RealHomePhone.com](http://www.RealHomePhone.com)  
Service provided by Global Connection Inc.

# Real HOME PHONE SERVICE™

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities  
Commission Consumer Affairs at  
303-894-2070 or 800-456-0858

Georgia Public Service Commission's  
Consumer Affairs Unit at 404-656-4501  
or 1-800-282-5813

Kansas Commission's Office of Public Affairs  
and Consumer Protection at 785-271-3140  
or 800-662-0027 TDD 800-766-3777

Massachusetts Consumer Division Dept.  
of Telecommunications & Cable  
617-305-3531 or 800-392-6066

## IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll. Proof** may consist of eligible program card or statement of benefits. Eligible lifeline subscribers are offered our lowest basic wireline plan of \$20.70 per month plus taxes & fees in the AT&T area only.

### LIFELINE ELIGIBILITY CRITERIA Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, KS, MI, NM, OH, TX, VT
Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VT, VA, WA, WV, WI, WY.	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY	
Tribally Administered TANF; AK, CA, FL, KS, LA, MN, OK, RI, UT			

www.RealHomePhone.com • 1-877-511-3009 • Service provided by Global Connection Inc.

**CONTACT YOUR LOCAL AGENT:**

# Real HOME PHONE SERVICE™

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities  
Commission Consumer Affairs at  
303-894-2070 or 800-456-0858

Georgia Public Service Commission's  
Consumer Affairs Unit at 404-656-4501  
or 1-800-282-5813

Kansas Commission's Office of Public Affairs  
and Consumer Protection at 785-271-3140  
or 800-662-0027 TDD 800-766-3777

Massachusetts Consumer Division Dept.  
of Telecommunications & Cable  
617-305-3531 or 800-392-6066

## IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll. Proof** may consist of eligible program card or statement of benefits. Eligible lifeline subscribers are offered our lowest basic wireline plan of \$20.70 per month plus taxes & fees in the AT&T area only.

### LIFELINE ELIGIBILITY CRITERIA Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, KS, MI, NM, OH, TX, VT
Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VT, VA, USVI, WA, WV, WI, WY	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY	
Tribally Administered TANF; AK, CA, FL, KS, LA, MN, OK, RI, UT			

www.RealHomePhone.com • 1-877-511-3009 • Service provided by Global Connection Inc.

**CONTACT YOUR LOCAL AGENT:**

# Real HOME PHONE SERVICE™

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities  
Commission Consumer Affairs at  
303-894-2070 or 800-456-0858

Georgia Public Service Commission's  
Consumer Affairs Unit at 404-656-4501  
or 1-800-282-5813

Kansas Commission's Office of Public Affairs  
and Consumer Protection at 785-271-3140  
or 800-662-0027 TDD 800-766-3777

Massachusetts Consumer Division Dept.  
of Telecommunications & Cable  
617-305-3531 or 800-392-6066

## IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll. Proof** may consist of eligible program card or statement of benefits. Eligible lifeline subscribers are offered our lowest basic wireline plan of \$20.70 per month plus taxes & fees in the AT&T area only.

### LIFELINE ELIGIBILITY CRITERIA Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, KS, MI, NM, OH, TX, VT
Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VT, VA, USVI, WA, WV, WI, WY	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY	
Tribally Administered TANF; AK, CA, FL, KS, LA, MN, OK, RI, UT			

www.RealHomePhone.com • 1-877-511-3009 • Service provided by Global Connection Inc.

**CONTACT YOUR LOCAL AGENT:**



ACERCATE  
AL ASISTENTE  
DE TIENDA PARA  
REGISTRARTE AHORA!

DILE HOLA  
AL SERVICIO LEGITIMO  
DE TELEFONO DE CASA

GRANDES  
AHORROS

PRIMER MES

~~\$36.45~~ GRATIS!

LIFELINE

PAQUETE AVANZADO

• Identificador de llamada • Llamada en espera  
• 100 minutos de larga distancia • Llamadas locales  
ilimitadas • Acceso al 911

**\$25.70\*** AL MES

LARGA DISTANCIA

ILIMITADA

**\$10** al mes

Fácil acceso  
Marcando 1+.  
No se requiere  
código de acceso

Con gusto aceptamos pagos de Global Connection Servicio legítimo de casa.

- ✓ Llamadas locales ilimitadas
- ✓ No verificamos crédito
- ✓ Magníficos planes
- ✓ No contratos
- ✓ No deposito

Si recibe algún tipo de ayuda de Gobierno tales como Cupones de Alimentos, SSI ó Medicaid, Usted puede ser elegible para un descuento Lifeline teléfono de casa.

Ver al respaldo Para contactarse  
y recibir información  
English available



PEEP Agent Type SPAN REV001-000015

\*Restricciones aplican. Visite [www.RealHomePhone.com](http://www.RealHomePhone.com) para detalles. Exclusivo AT&T área. Incluye descuento calificado de LIFELINE. Mas impuestos y recargos. Para clientes Elegibles de Lifeline solamente.

Legítimo  
SERVICIO  
TELÉFONICO  
DE CASA.

[www.RealHomePhone.com](http://www.RealHomePhone.com)  
Service provided by Global Connection Inc.

ACERCATE  
AL ASISTENTE  
DE TIENDA PARA  
REGISTRARTE AHORA!

DILE HOLA  
AL SERVICIO LEGITIMO  
DE TELEFONO DE CASA

GRANDES  
AHORROS

PRIMER MES

~~\$36.45~~ GRATIS!

LIFELINE

PAQUETE AVANZADO

• Identificador de llamada • Llamada en espera  
• 100 minutos de larga distancia • Llamadas locales  
ilimitadas • Acceso al 911

**\$25.70\*** AL MES

LARGA DISTANCIA

ILIMITADA

**\$10** al mes

Fácil acceso  
Marcando 1+.  
No se requiere  
código de acceso

Con gusto aceptamos pagos de Global Connection Servicio legítimo de casa.

- ✓ Llamadas locales ilimitadas
- ✓ No verificamos crédito
- ✓ Magníficos planes
- ✓ No contratos
- ✓ No deposito

Si recibe algún tipo de ayuda de Gobierno tales como Cupones de Alimentos, SSI ó Medicaid, Usted puede ser elegible para un descuento Lifeline teléfono de casa.

Ver al respaldo Para contactarse  
y recibir información  
English available



PEEP Agent Type SPAN REV001-000015

\*Restricciones aplican. Visite [www.RealHomePhone.com](http://www.RealHomePhone.com) para detalles. Exclusivo AT&T área. Incluye descuento calificado de LIFELINE. Mas impuestos y recargos. Para clientes Elegibles de Lifeline solamente.

Legítimo  
SERVICIO  
TELÉFONICO  
DE CASA.

[www.RealHomePhone.com](http://www.RealHomePhone.com)  
Service provided by Global Connection Inc.

ACERCATE  
AL ASISTENTE  
DE TIENDA PARA  
REGISTRARTE AHORA!

DILE HOLA  
AL SERVICIO LEGITIMO  
DE TELEFONO DE CASA

GRANDES  
AHORROS

PRIMER MES

~~\$36.45~~ GRATIS!

LIFELINE

PAQUETE AVANZADO

• Identificador de llamada • Llamada en espera  
• 100 minutos de larga distancia • Llamadas locales  
ilimitadas • Acceso al 911

**\$25.70\*** AL MES

LARGA DISTANCIA

ILIMITADA

**\$10** al mes

Fácil acceso  
Marcando 1+.  
No se requiere  
código de acceso

Con gusto aceptamos pagos de Global Connection Servicio legítimo de casa.

- ✓ Llamadas locales ilimitadas
- ✓ No verificamos crédito
- ✓ Magníficos planes
- ✓ No contratos
- ✓ No deposito

Si recibe algún tipo de ayuda de Gobierno tales como Cupones de Alimentos, SSI ó Medicaid, Usted puede ser elegible para un descuento Lifeline teléfono de casa.

Ver al respaldo Para contactarse  
y recibir información  
English available



PEEP Agent Type SPAN REV001-000015

\*Restricciones aplican. Visite [www.RealHomePhone.com](http://www.RealHomePhone.com) para detalles. Exclusivo AT&T área. Incluye descuento calificado de LIFELINE. Mas impuestos y recargos. Para clientes Elegibles de Lifeline solamente.

Legítimo  
SERVICIO  
TELÉFONICO  
DE CASA.

[www.RealHomePhone.com](http://www.RealHomePhone.com)  
Service provided by Global Connection Inc.

# Legítimo SERVICIO TELEFÓNICO DE CASA™

Los clientes pueden ponerse en contacto con la Administración Pública Estatal ó Comisión de Servicios Públicos para preguntas sin resolver ó quejas sobre servicios básicos:

Servicios Públicos de Colorado servicio al Consumidor Comisión de Asuntos 303-894-2070 ó 800-456-0858.	Georgia comisión de Servicios Publicos de asuntos al consumidor al 404-656-4501 ó al 1800-282-5813
Kansas Oficina de la Comisión de los asuntos públicos protección al consumidor en 785-271-3140 ó al 800-662-0027. TDD 800-766-3777	Massachusetts División de Consumo Departamento de Telecomunicaciones y Cable 617-305-3531 ó 800-392-6066.

## IMPORTANTE INFORMACIÓN DE SERVICIO DE LIFELINE PARA SERVICIO RESIDENCIAL:

Lifeline es un programa de asistencia del gobierno. Sólo un servicio Lifeline está disponible por hogar. Una violación de las normas por la Comisión Federal de Comunicaciones de un servicio- por hogar constituye en la cancelación del programa. No está permitido recibir múltiples beneficios de Lifeline en un solo hogar, ya sean de una o varias compañías. Esto incluye el servicio residencial y móvil. Lifeline es un beneficio que no es transferible a otra persona. Usted debe activar su servicio y usar el teléfono para continuar recibiendo el servicio. Lifeline es un beneficio federal. Haciendo declaraciones falsas voluntariamente para obtener el beneficio puede resultar en multas, prisión, cancelación del servicio o ser excluidos del programa. Se requiere prueba de elegibilidad para inscribirse. El comprobante puede consistir en tarjeta de programa elegibles o declaración de beneficios. Los suscriptores elegibles para Lifeline se les ofrecen nuestra tarifa más baja de teléfono de casa de \$20.70 por mes , más impuestos solo en el área de AT&T.

CRITERIO DE ELEGIBILIDAD PARA LIFELINE Revise su elegibilidad en la siguiente lista			
Programa de Asistencia de Nutrición Complementaria (SNAP) (Cupones para alimentos); Asistencia de Calefacción y Energía para personas con bajos ingresos (LIHEAP); Seguro de Ingreso Complementario (SSI); Asistencia de vivienda pública federal (Sección 8); Ayuda temporal para familias necesitadas (TANF); Programa nacional de almuerzos escolares gratuitos (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Oficina general de asistencia indígena; AK, CA, FL, KS, LA, MN, OK, RI, UT	Distribución de alimentos en territorio tribal; FL, KS, LA, MN, OK, RI, UT	150% de los lineamientos de pobreza federales o por debajo de ellos; AZ, KS, MI, NM, OH, TX, VT
Head Start (solo para quienes califican por ingresos/territorio tribal); AK, CA, FL, KS, LA, MN, OK, RI, UT	TANF administrado tribalmente; AK, CA, FL, KS, LA, MN, OK, RI, UT	135% de los lineamientos de pobreza federales o por debajo de ellos; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY	El estado tiene programas de calificación específicos (Consultenos); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY

www.Realhomephone.com Servicio proporcionado por Global Connection Inc.

**CONTACTE A SU AGENTE LOCAL:**

# Legítimo SERVICIO TELEFÓNICO DE CASA™

Los clientes pueden ponerse en contacto con la Administración Pública Estatal ó Comisión de Servicios Públicos para preguntas sin resolver ó quejas sobre servicios básicos:

Servicios Públicos de Colorado servicio al Consumidor Comisión de Asuntos 303-894-2070 ó 800-456-0858.	Georgia comisión de Servicios Publicos de asuntos al consumidor al 404-656-4501 ó al 1800-282-5813
Kansas Oficina de la Comisión de los asuntos públicos protección al consumidor en 785-271-3140 ó al 800-662-0027. TDD 800-766-3777	Massachusetts División de Consumo Departamento de Telecomunicaciones y Cable 617-305-3531 ó 800-392-6066.

## IMPORTANTE INFORMACIÓN DE SERVICIO DE LIFELINE PARA SERVICIO RESIDENCIAL:

Lifeline es un programa de asistencia del gobierno. Sólo un servicio Lifeline está disponible por hogar. Una violación de las normas por la Comisión Federal de Comunicaciones de un servicio- por hogar constituye en la cancelación del programa. No está permitido recibir múltiples beneficios de Lifeline en un solo hogar, ya sean de una o varias compañías. Esto incluye el servicio residencial y móvil. Lifeline es un beneficio que no es transferible a otra persona. Usted debe activar su servicio y usar el teléfono para continuar recibiendo el servicio. Lifeline es un beneficio federal. Haciendo declaraciones falsas voluntariamente para obtener el beneficio puede resultar en multas, prisión, cancelación del servicio o ser excluidos del programa. Se requiere prueba de elegibilidad para inscribirse. El comprobante puede consistir en tarjeta de programa elegibles o declaración de beneficios. Los suscriptores elegibles para Lifeline se les ofrecen nuestra tarifa más baja de teléfono de casa de \$20.70 por mes , más impuestos solo en el área de AT&T.

CRITERIO DE ELEGIBILIDAD PARA LIFELINE Revise su elegibilidad en la siguiente lista			
Programa de Asistencia de Nutrición Complementaria (SNAP) (Cupones para alimentos); Asistencia de Calefacción y Energía para personas con bajos ingresos (LIHEAP); Seguro de Ingreso Complementario (SSI); Asistencia de vivienda pública federal (Sección 8); Ayuda temporal para familias necesitadas (TANF); Programa nacional de almuerzos escolares gratuitos (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Oficina general de asistencia indígena; AK, CA, FL, KS, LA, MN, OK, RI, UT	Distribución de alimentos en territorio tribal; FL, KS, LA, MN, OK, RI, UT	150% de los lineamientos de pobreza federales o por debajo de ellos; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY
Head Start (solo para quienes califican por ingresos/territorio tribal); AK, CA, FL, KS, LA, MN, OK, RI, UT	TANF administrado tribalmente; AK, CA, FL, KS, LA, MN, OK, RI, UT	135% de los lineamientos de pobreza federales o por debajo de ellos; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY	El estado tiene programas de calificación específicos (Consultenos); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY

www.Realhomephone.com Servicio proporcionado por Global Connection Inc.

**CONTACTE A SU AGENTE LOCAL:**

# Legítimo SERVICIO TELEFÓNICO DE CASA™

Los clientes pueden ponerse en contacto con la Administración Pública Estatal ó Comisión de Servicios Públicos para preguntas sin resolver ó quejas sobre servicios básicos:

Servicios Públicos de Colorado servicio al Consumidor Comisión de Asuntos 303-894-2070 ó 800-456-0858.	Georgia comisión de Servicios Publicos de asuntos al consumidor al 404-656-4501 ó al 1800-282-5813
Kansas Oficina de la Comisión de los asuntos públicos protección al consumidor en 785-271-3140 ó al 800-662-0027. TDD 800-766-3777	Massachusetts División de Consumo Departamento de Telecomunicaciones y Cable 617-305-3531 ó 800-392-6066.

## IMPORTANTE INFORMACIÓN DE SERVICIO DE LIFELINE PARA SERVICIO RESIDENCIAL:

Lifeline es un programa de asistencia del gobierno. Sólo un servicio Lifeline está disponible por hogar. Una violación de las normas por la Comisión Federal de Comunicaciones de un servicio- por hogar constituye en la cancelación del programa. No está permitido recibir múltiples beneficios de Lifeline en un solo hogar, ya sean de una o varias compañías. Esto incluye el servicio residencial y móvil. Lifeline es un beneficio que no es transferible a otra persona. Usted debe activar su servicio y usar el teléfono para continuar recibiendo el servicio. Lifeline es un beneficio federal. Haciendo declaraciones falsas voluntariamente para obtener el beneficio puede resultar en multas, prisión, cancelación del servicio o ser excluidos del programa. Se requiere prueba de elegibilidad para inscribirse. El comprobante puede consistir en tarjeta de programa elegibles o declaración de beneficios. Los suscriptores elegibles para Lifeline se les ofrecen nuestra tarifa más baja de teléfono de casa de \$20.70 por mes , más impuestos solo en el área de AT&T.

CRITERIO DE ELEGIBILIDAD PARA LIFELINE Revise su elegibilidad en la siguiente lista			
Programa de Asistencia de Nutrición Complementaria (SNAP) (Cupones para alimentos); Asistencia de Calefacción y Energía para personas con bajos ingresos (LIHEAP); Seguro de Ingreso Complementario (SSI); Asistencia de vivienda pública federal (Sección 8); Ayuda temporal para familias necesitadas (TANF); Programa nacional de almuerzos escolares gratuitos (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Oficina general de asistencia indígena; AK, CA, FL, KS, LA, MN, OK, RI, UT	Distribución de alimentos en territorio tribal; FL, KS, LA, MN, OK, RI, UT	150% de los lineamientos de pobreza federales o por debajo de ellos; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY
Head Start (solo para quienes califican por ingresos/territorio tribal); AK, CA, FL, KS, LA, MN, OK, RI, UT	TANF administrado tribalmente; AK, CA, FL, KS, LA, MN, OK, RI, UT	135% de los lineamientos de pobreza federales o por debajo de ellos; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY	El estado tiene programas de calificación específicos (Consultenos); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY

www.Realhomephone.com Servicio proporcionado por Global Connection Inc.

**CONTACTE A SU AGENTE LOCAL:**

**Exhibit D**

**Georgia Public Service Commission Order**

---



COMMISSIONERS:

LAUREN "BUBBA" McDONALD, JR., CHAIRMAN  
STAN WISE  
ROBERT B. BAKER, JR.  
CHUCK EATON  
H. DOUG EVERETT



**FILED**

DEC 28 2010

DEBORAH K. FLANNAGAN  
EXECUTIVE DIRECTOR

EXECUTIVE SECRETARY  
G.P.S.C. REECE McALISTER  
EXECUTIVE SECRETARY

**Georgia Public Service Commission**

(404) 656-4501  
(800) 282-5813

244 WASHINGTON STREET, S.W.  
ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341  
www.psc.state.ga.us

**DOCKET#** 9322  
**DOCUMENT#** 133041

Docket No. 9322

**IN RE: Application of Global Connection, Inc. for Certificate of Authority to  
Provide Local Exchange Service**

**ORDER ADOPTING CONSENT ORDER**

This matter comes before the Georgia Public Service Commission ("Commission") to consider the proposed Consent Order (Attachment "A") between the Commission Staff and Global Connection, Inc. ("Global Connection").

**JURISDICTION**

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to

exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

### **Background**

1.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders. These violations are detailed in the Consent Order that is attached as Exhibit A to this Order. A summary of these violations is provided below.

2.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund.

3.

Staff also determined that Global Connection charged a late fee in excess of the amount permitted in its Commission-approved tariff to an estimated 5,500 customers in Georgia.

4.

Finally, Staff determined that, beginning in or before July, 2008, the customer bills issued by Global Connection included a processing fee associated with switching carriers or terminating service that was inconsistent with the provisions of its Commission-approved tariff.

5.

To resolve these violations, Global Connection entered into a Consent Order with the Commission Staff in which it agreed to pay a civil penalty in the amount of \$55,000.00. Under the terms of the Consent Order, Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

6.

Also, to resolve these violations, beginning with its next billing cycle, Global Connection agreed to make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

## **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1.

After considering the proposed Consent Order, the Commission finds and concludes that the terms and conditions of the Stipulation are reasonable. The Commission finds that the amount of the civil penalty is reasonable, in light of the totality of the facts set forth in the Consent Order. The appropriate amount of a civil penalty involves judgment, and may be specific to the facts of the particular case. The penalty provided for in the Consent Order is sufficient to preserve the integrity of the Commission's rules, orders and administration of Georgia law.

2.

The record in this case shows that for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund ("UAF"). (Consent Order, ¶ 6). This action violates O.C.G.A. § 46-5-167(g), which provides that "A local exchange company or other company shall not establish a surcharge on customers' bills to collect from customers' contributions [to the UAF]." The Commission administers this statute. O.C.G.A. §§ 46-5-162(4) and 46-5-167.

3.

The record also shows that Global Connection recovered from an estimated 5,500 customers a late penalty of \$10.00. (Consent Order, ¶¶ 8, 10). The Commission-approved tariff sets a maximum late penalty of 1.5 percent of the past due amounts. *Id.* at ¶ 7. The monthly charge for Global Connection's service is approximately \$50.00. *Id.* at ¶ 9. The Commission finds that the late fee Global Connection recovered from these customers exceeded the late fee set forth in the Company's applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

4.

Finally, the facts show that Global Connection's customer bills stated that a \$25.00 processing fee applied in the event that a customer switched to another carrier or disconnected service. (Consent Order, ¶ 12). However, Section 2.13 of Global Connection's Commission-approved local service tariff does not authorize the imposition of this processing fee in those instances in which a customer cancels service after service has been installed. The Commission concludes that the customer bills do not comply with the applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

5.

The Commission also finds that it is reasonable to require Global Connection to modify its customer bills to comply with the Commission-approved tariff beginning with the next billing cycle.

**WHEREFORE IT IS ORDERED**, that the Commission hereby adopts as an Order of this Commission, the Consent Order signed by the Commission Staff and Global Connection dated December 13, 2010, and attached as "Exhibit A" to this Order.

**ORDERED FURTHER**, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

**ORDERED FURTHER**, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

**ORDERED FURTHER**, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 21<sup>st</sup> day of December, 2010.



Reece McAlister  
Executive Secretary



Lauren "Bubba" McDonald, Jr.  
Chairman

12-22-10  
Date

12-22-10  
Date

BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION

**FILED**

DEC 13 2010

IN RE:      **Application of Global Connection, Inc. for Certificate of Authority to  
Provide Local Exchange Service**

EXECUTIVE SECRETARY  
G.P.S.C.

**CONSENT ORDER**

The Staff of the Georgia Public Service Commission and Global Connection, Inc. ("Global Connection") hereby agree to present the following proposed disposition of the violations detailed herein to the Commission.

**BACKGROUND AND LEGAL AUTHORITY**

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

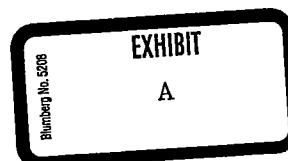
Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

4.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders.



5.

Pursuant to the Telecom Act, the Commission created a Universal Access Fund “to assure the provision of reasonably priced access to basic local exchange services throughout Georgia.” O.C.G.A. § 46-5-167(a). All certified telecommunications companies in Georgia are required to make quarterly contributions to the fund. O.C.G.A. § 46-5-167(b). Companies are prohibited from establishing a surcharge on customers’ bills to collect this contribution from customers. O.C.G.A. § 46-5-167(g).

6.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund. This action by Global Connection violated O.C.G.A. § 46-5-167(g).

7.

Section 2.15 of Global Connection’s Commission-approved local service tariff is entitled “Late Payment Charge.” This section states that “Invoices more than thirty (30) days past due will incur a monthly finance charge on the unpaid balance at a rate equal to the lesser of one and one-half percent (1.5%) per month or the maximum rate permitted by applicable Regulation.”

8.

The Commission Staff found that, for at least the time period of July, 2008 through August 2010, bills issued by Global Connection to its customers in Georgia stated that “[a] \$10.00 Late Fee Will Be Applied to Accounts When Payment Is Not Posted By Due Date.”

9.

The monthly charge a customer receiving local telecommunications service from Global Connection is approximately \$50.00. Therefore, the late fee that Global Connection included on its customer bills significantly exceeded the late fee permitted pursuant to its Commission-approved tariff.

10.

Based on discovery responses and discussions between Staff and Global Connection, the parties estimate that Global Connection collected the excessive late fee from about 5,500 customers in Georgia.

11.

Section 2.13 of Global Connection’s Commission-approved local service tariff states that “Customers who cancel a Service Order prior to Service installation (including without limitation cancellation of special construction or Services provided on an individual case basis will incur a

charge equal to the greater of (i) the non-recurring charges for the MSP, or (ii) the company's reasonably incurred, actual expenses associated with such cancellation."

12.

Beginning in or before July, 2008, Global Connection's bills issued by Global Connection to its customers in Georgia stated that "If this invoice is **PAID IN FULL**, [Global Connection] will issue a refund in the event of switching to another carrier or disconnection occurs prior to Bill Due Date, **minus a \$25 processing fee.**" (emphasis in original).

13.

Global Connection's Commission-approved local service tariff does not authorize the imposition of the processing fee described in paragraph 12 in those instances in which a customer cancels service after service has been installed. Therefore, the customer bills do not comply with the Commission-approved tariff.

### AGREEMENT

The parties to this Consent Agreement are desirous of resolving this matter and believe that it is in the public interest to do so under the terms and conditions described herein. The undersigned parties hereby agree that this matter should be disposed of as follows:

1.

This Consent Agreement, if approved by the Commission, shall constitute a Final Order resolving the violations discussed herein. The parties agree that they will abide by the terms of the Consent Agreement.

2.

The Consent Agreement shall not become effective until approved without modification by the Commission. This Consent Agreement shall be void and of no effect whatsoever if it is not approved in its entirety by action of the Commission.

3.

Global Connection agrees to pay to the Commission in certified funds a civil penalty in the amount of \$55,000.00. Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

4.

Beginning with its next billing cycle, Global Connection shall make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

5.

By entering into this Consent Agreement, Global Connection does not waive any notice, right, hearing, claim or defense with regard to any future action brought against it by the Commission or by any other person.

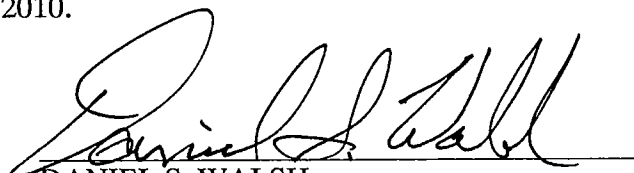
6.

Nothing in this Consent Agreement shall be construed to relieve Global Connection from its responsibility to comply with the terms and conditions of its Certificates of Authority, the rules and regulations of the Commission, and the laws of the State of Georgia.

7.

Each of the undersigned acknowledges that he has read this Consent Agreement and understands its contents. Each of the undersigned acknowledges that the party he or she represents freely, knowingly and voluntarily enters into this consent Agreement. Each of the undersigned parties hereby consents to the resolution of this proceeding as provided.

Agreed to this 13<sup>th</sup> day of December 2010.

  
DANIEL S. WALSH  
Senior Assistant Attorney General

  
GLOBAL CONNECTION, INC.



## **Exhibit D**

### **Management Qualifications**

## **Managerial & Technical Qualifications**

Dave Skogen, *Chief Executive Officer*

Dave is a twenty-plus year veteran executive in the telecommunications industry. Dave joined the Company as COO in November of 2010 and was promoted to CEO in January of 2011. Since then, Dave has transformed the company from a small wireline company operating in five states to a wireline and wireless operation with ETC approvals in over twenty states. Prior to joining Global, Dave held a number of positions of increasing responsibility with MCI and Verizon including Executive Director and General Manager in charge of the company's Prepaid business unit. Dave holds a BBA-Finance from the University of Iowa and is a member of the Global Board of Directors, the Young Presidents Organization (ypo.org) and a Board Member of the National Lifeline Association (nalalifeline.org).

Edward Smith, *Chief Financial Officer*

Ed is an accomplished financial executive leading Fortune 500 financial divisions with a specialization in transforming underperforming departments, processes and systems into workable solutions that help achieve corporate objectives. He is a hands-on operational manager and a member of the executive management team, reporting to board level executives and providing strategy and business generating ideas and solutions.

Ed was recruited to MCI to help lead the company out of bankruptcy by reengineering all Revenue and Accounts Receivable systems and procedures and leading over 550 accounting professionals in one of the largest bankruptcies and restatements in US history. With strong and proven technical skills, Ed targets productivity and process improvements demanding that controls, reliability and information availability remain at the forefront.

Ed has a 30-year financial career including Billing and Commissions Operations, Business and Capital Planning, Contract Management and SEC reporting. He holds a MAcc from the University of Georgia and is a Certified Public Accountant.