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April 20, 2022

VIA EMAIL TO tpuc.docketroom@tn.gov
& FEDERAL EXPRESS

22-00034

Attn: Docket & Records Manager
Tennessee Public Utility Commission
Andrew Jackson State Office bldg.
502 Deaderick St, 4th Floor
Nashville, TN 37243
(615) 741-2904

Re: Global Connection Inc. of America d/b/a STANDUP WIRELESS

Dear Sir/Madam:

Attached please find for filing Global Connection Inc. of America d/b/a STANDUP WIRELESS' Petition for Designation as an Eligible Telecommunications Carrier in Tennessee. Additionally, an original and four (4) copies are being sent via overnight delivery to the Docket Room along with a check in the amount of \$25.00 payable to the "Tennessee Public Utility Commission" for the filing fee and an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if we may provide you with any additional information, please do not hesitate to contact us. Thank you.

Respectfully submitted,



Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
*Attorneys for Global Connection Inc. of America d/b/a
STANDUP WIRELESS*

cc: Eric Schimpf

**BEFORE THE
TENNESSEE PUBLIC UTILITY COMMISSION**

Global Connection Inc. of America
d/b/a STANDUP WIRELESS
Petition for Designation as an Eligible
Telecommunications Carrier

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)
) Docket No. **22-00034**
)

PETITION

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April 15, 2020

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	COMPANY OVERVIEW	3
III.	THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCS	5
IV.	STANDUP SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201	8
V.	STANDUP SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a).....	13
VI.	DESIGNATION OF STANDUP AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST	19
VII.	CONCLUSION.....	24

TABLE OF EXHIBITS

	<u>Exhibit</u>
Certification	1
FCC-Approved Compliance Plan.....	2
Coverage Area	3
Key Management Bios.....	4
Proposed Lifeline Offering	5
Sample Advertisements	6

**BEFORE THE
TENNESSEE PUBLIC UTILITY COMMISSION**

Global Connection Inc. of America
d/b/a STANDUP WIRELESS
Petition for Designation as an Eligible
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I. INTRODUCTION

Global Connection Inc. of America d/b/a STANDUP WIRELESS (“STANDUP” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Tennessee Public Utility Commission (“Commission”)—namely, Tennessee Code Annotated (“TCA”), Section 65-4-104 as recently amended, hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Tennessee (“Petition”).

STANDUP seeks ETC designation solely to provide Lifeline service to qualifying Tennessee consumers; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high cost areas.³ As demonstrated herein, and as certified in Exhibit 1 attached hereto, STANDUP meets all the statutory and regulatory requirements for designation as an ETC in the State of Tennessee, including the requirements outlined in the FCC’s *Lifeline and*

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that the Company only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

Link Up Reform Order,⁴ *Lifeline Modernization Order*,⁵ and *Fifth Report and Order*.⁶

Furthermore, STANDUP is positioned to reach unserved and underserved Lifeline-eligible consumers. Rapid grant of STANDUP's request, therefore, would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array of low-income Tennessee residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

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

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⁴ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*" or "*Lifeline Modernization Order*").

⁶ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, "*Fifth Report and Order*").

II. COMPANY OVERVIEW

Global Connection Inc. of America d/b/a STANDUP WIRELESS is a Georgia Corporation,⁷ with its principal office located at 842 Monmouth Street, Newport, Kentucky 41071. STANDUP is currently a wholly owned subsidiary of Global Connection Holdings Corporation (“Global Holdings”), a U.S. company whose principal place of business is located at 842 Monmouth Street, Newport, Kentucky 41071. Global Holdings operates as a holding company for Global Connection and does not provide telecommunications services.

STANDUP is a provider of commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless network of T-Mobile USA, Inc. (“T-Mobile” or its “Underlying Carrier”) on a wholesale basis. STANDUP obtains from its T-Mobile the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”), similar to TracFone Wireless, Inc. (“TracFone”), Virgin Mobile USA, L.P. (“Virgin Mobile”), and i-wireless, LLC (“i-wireless”), each of which has been granted ETC status in Tennessee.⁸ STANDUP is currently designated as an ETC in the following jurisdictions: Arkansas, Arizona, California, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma,

⁷ Global Connection Inc. of America was incorporated in the State of Georgia on June 1, 1998.

⁸ See *TracFone Wireless, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of New York, Virginia, Connecticut, Massachusetts, Alabama, North Carolina, Tennessee, Delaware, New Hampshire, Pennsylvania, and the District of Columbia*, CC Docket No. 96-45, Order, 23 FCC Rcd 6206 (2008) (“*TracFone ETC Order*”), the Commission had previously granted TracFone forbearance from the facilities requirement for ETC designation, permitting TracFone to offer the supported services via resale only; see also *Petition of Virgin Mobile USA, L.P. for Forbearance from 47 U.C.S. § 214(e)(1)(A) and Petition for ETC Designation in New York, Virginia, North Carolina, and Tennessee*, CC Docket No. 96-45, Order, 24 FCC Rcd 3381 (2009) (“*Virgin Mobile Order*”), the *Virgin Mobile Order* contained both the forbearance analysis and ETC designation; see also *i-wireless, LLC Amended Petition for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia*, WC Docket No. 09-197, Order, 27 FCC Rcd 6263 (2012) (“*i-wireless ETC Order*”).

Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

STANDUP will provide affordable prepaid mobile phone service and high quality customer service. STANDUP'S service offering will include: (1) local and long distance calling; (2) access to the following custom calling features at no charge: (a) Caller ID; (b) Call Waiting; (c) Call Forwarding; (d) 3-Way Calling; and (e) Voicemail; (3) text messaging; (4) broadband access; and (5) the option for a consumer to "bring their own device". STANDUP may provide user-friendly handsets or hotspot devices. STANDUP's products and plans will be specially geared toward serving lower income communities, especially in rural areas that are predominantly unserved by other ETCs designated in the state, and its service models and pricing plans will reflect this mission. The Company will not require service contracts from its customers and it will always ensure competitively low pricing for its services and products. STANDUP will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and live customer service. The Company's prepaid, budget-friendly pricing will give many low-income consumers the option of having mobile phone service and broadband access without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their STANDUP service to suit their needs with STANDUP's available bundles of minutes, broadband data, and text packages to supplement their monthly plan.

STANDUP's Lifeline customers will be low-income consumer households that will depend on, and benefit greatly from, STANDUP's inexpensive and flexible pricing plans. STANDUP will not impose credit checks, nor will it require any deposits or contractual commitments. Most of STANDUP's customers likely will turn to STANDUP because they cannot afford the postpaid services provided by traditional wireless carriers. STANDUP will affirmatively reach out to the

low-income sector of the consumer base to offer attractive and affordable communications options. As such, STANDUP will contribute to the expansion of mobile wireless and broadband services for low-income consumers in Tennessee.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.⁹ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.¹⁰ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Senate Bill 2443 amended TCA §65-4-104 effective April 8, 2022 as follows:

“Tennessee Code Annotated, Section 65-4-104, is amended by adding the following as a new subsection:

The commission has general supervisory and regulatory power, jurisdiction, and control over radio common carriers and commercial mobile radio services engaged in providing universal service as described in 47 U.S.C. § 254.”

Thus, the Commission now has jurisdiction over wireless ETC designation requests. Until recently, wireless companies were required to petition the FCC to be designated as an ETC in Tennessee. There are thirty-five (35) wireless ETC designation petitions pending at the FCC, many of which were filed in 2012 or 2013.¹¹ STANDUP’s own FCC ETC Petition was originally

⁹ 47 U.S.C. § 214(e)(2).

¹⁰ *USF Order*, at 8858–59, ¶ 145.

¹¹ See <https://www.fcc.gov/general/lifeline-compliance-plans-etc-petitions>.

filed in April of 2012.¹² For ten (10) years, the FCC had created a roadblock to competition in the Non-Jurisdictional States—including Tennessee—by not processing pending ETC applications. As a result, only three (3) mobile providers such as STANDUP had been approved to provide Lifeline service in Tennessee: TracFone Wireless (under “SafeLink Wireless”), Virgin Mobile (under “Assurance Wireless”), and i-wireless (under “Access Wireless”). STANDUP applauds the Commission for taking action to increase the number of ETCs in Tennessee, and thus increase the ability to reach additional eligible Lifeline subscribers. STANDUP is ready, capable, and willing to serve these customers.

STANDUP therefore requests that the Commission expeditiously process the instant Petition so that STANDUP can quickly begin expanding the availability of affordable Lifeline-supported wireless services to qualifying low-income customers in Tennessee.

STANDUP recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC’s Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier’s services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.¹³ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance

¹² *Global Connection Inc. of America d/b/a StandUp Wireless Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia* (April 4, 2012), WC Docket No. 09-197, Amended Petition filed February 26, 2013 (“*FCC ETC Petition*”).

¹³ See *Lifeline and Link Up Reform Order* at ¶ 368.

with the FCC’s grant of forbearance, and therefore, may not apply the facilities-based requirement to STANDUP. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant STANDUP’s request for designation as an ETC throughout the State of Tennessee.

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

Section 254(e) of the Act provides that, “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹⁴ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services, except where the FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.¹⁵ As detailed below, STANDUP satisfies each of the above-listed requirements.

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

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as STANDUP. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities”

¹⁴ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“*USF Order*”).

¹⁵ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹⁶

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

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

In accordance with the *Lifeline and Link Up Reform Order*, STANDUP filed a Compliance Plan with the FCC, which the FCC approved on August 8, 2012,¹⁷ a copy of the which is attached hereto as Exhibit 2. STANDUP commits to providing Lifeline service in Tennessee in accordance with its FCC-approved Compliance Plan, as amended, and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

B. STANDUP Is a Common Carrier

CMRS providers like STANDUP are treated as common carriers.¹⁸

¹⁶ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

¹⁷ See FCC Public Notice DA 12-1286, <https://www.fcc.gov/document/wcb-approves-compliance-plans-birch-communications>.

¹⁸ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); see also *PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.") (emphasis added).

C. STANDUP Will Provide All Supported Services

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

1. Voice Telephony Service

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

Voice Grade Access to the Public Switched Telephone Network. STANDUP provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from T-Mobile.

Local Usage At No Additional Charge. STANDUP offers rate plans that provide its customers with minutes of use for local service at no additional charge.

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

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.¹⁹ "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."²⁰ Nonetheless, STANDUP's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is

¹⁹ See *Lifeline and Link Up Reform Order* at ¶ 367.

²⁰ See *id.* at ¶ 49.

offered on a prepaid, or pay-as-you-go, basis. STANDUP's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.

2. Broadband Internet Access Services

While no longer a required supported service under 47 C.F.R. § 54.101(a), STANDUP provides Broadband Internet access service ("BIAS") to ensure its Lifeline customers receive full Lifeline support. The FCC has stated that BIAS consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."²¹ STANDUP provides BIAS to low-income consumers via resale of T-Mobile's services.

D. STANDUP Requests Designation Throughout Its Service Area

STANDUP is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, STANDUP is required to describe the geographic area(s) within which it requests designation as an ETC. STANDUP requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current zip code coverage footprint is attached hereto as Exhibit 3. STANDUP understands that its service area overlaps with rural carriers in Tennessee, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. STANDUP is not eligible for and does not seek Link-Up or high-cost support.

²¹ See 47 C.F.R. § 8.2(a).

Therefore, designation of STANDUP as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²² While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement), the FCC’s *Lifeline and Link Up Reform Memorandum Opinion and Order* (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.²³ In light of this forbearance, the Commission has the authority to designate ETCs such as STANDUP in rural areas without concern for the service area conformance requirement.²⁴

E. STANDUP Will Advertise the Availability of Supported Services

STANDUP will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). STANDUP will comply with the FCC’s rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, STANDUP’s marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must

²² See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, *Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

²³ See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, *Memorandum Opinion and Order*, FCC 13-44 (rel. April 15, 2013).

²⁴ See 47 C.F.R. § 54.207(c).

meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) STANDUP is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and 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. Additionally, STANDUP will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

STANDUP will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. STANDUP may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service. In addition, STANDUP intends to utilize its network of retail partners (once established) to help promote the availability of its Lifeline plans, especially retail outlets that are frequented by low-income consumers. STANDUP will provide retail vendors with signage to be displayed where Company products are sold, and with printed materials describing the Company's Lifeline program.

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

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

A. Service Commitment Throughout the Proposed Designated Service Area

STANDUP will provide service in Tennessee by reselling service which it obtains from its Underlying Carrier. T-Mobile's network is operational and largely built out. Thus, STANDUP will be able to commence offering its Lifeline service to all locations served by T-Mobile very soon after receiving approval from the Commission.

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

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. § 54.202(a)(2), STANDUP has the ability to remain functional in emergency situations. As discussed, STANDUP will utilize the extensive and well-established T-Mobile network and facilities to provide its Lifeline services. The Company understands that T-Mobile's network has access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. Indeed, its Underlying Carrier has repeatedly certified to the FCC that its network functions in emergency

situations.²⁵ The Underlying Carrier provides the same functionality to STANDUP and its customers as T-Mobile provides to itself and its own customers.

C. Commitment to Consumer Protection and Service Quality

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

D. STANDUP is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), STANDUP is financially and technically capable of providing Lifeline-supported services is currently offering Lifeline service in thirty (30) jurisdictions. STANDUP receives revenue from a number of sources which are completely independent from the revenue it will receive in the form of Lifeline support. STANDUP does not and will not rely exclusively on USF disbursements to operate. In addition, STANDUP's financial and technical capabilities to provide service are demonstrated by its performance of approximately 12 years in the Lifeline, with consistently strong service, organic growth, and robust protections to ensure its Lifeline customers meet eligibility requirements. STANDUP has been providing telecommunications services since 1998.

Furthermore, the senior management of STANDUP has great depth in the telecommunications industry and offers extensive telecommunications business technical and

²⁵ See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

managerial expertise to STANDUP. STANDUP will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carrier.

E. Terms and Conditions of Proposed Lifeline Offering

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

Attached hereto as Exhibit 5 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers will receive 1,000 voice minutes, unlimited text messages, and 4.5 gigabytes (GB) of data per month with full access to T-Mobile's 4G LTE network at a net cost of \$0.00 after application of Lifeline support.²⁶ Lifeline customers that also elect to receive ACP benefits from STANDUP will receive unlimited talk and text with 10 GB data after application of Lifeline and ACP support at a net cost of \$0.00. Customers will be able

²⁶ The current rate plan is based upon the 2021 FCC minimum service standards ("MSS") and will change based on the future MSS.

to purchase additional minutes or data as needed. All plans will include nationwide domestic long-distance at no extra per-minute charge, and STANDUP will not assess any usage for access to its free customer services (611). Emergency (911) calls will be free, regardless of service activation or availability of minutes, and will not count against the customer's airtime. The Company's Lifeline offering will provide feature-rich mobile connectivity for qualifying subscribers without the burden of credit checks or service contracts. STANDUP's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

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

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. Customers must then apply directly through the National Lifeline Eligibility Verifier ("National Verifier"), which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier's or Company's website) or request that a copy be mailed to them. STANDUP utilizes the standard Lifeline application forms as required by FCC rules, and thus complies with the disclosure and information collection requirements in 47 C.F.R. § 54.410(d).²⁷ STANDUP will certify and verify initial and continued consumer eligibility in accordance with 47 C.F.R. § 54.410, and will notify the applicant that the

²⁷ *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC's website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. STANDUP further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers' applications and determination of eligibility will be performed by the National Verifier.

G. Prevention of Waste, Fraud and Abuse

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. STANDUP will rely on the National Verifier to determine initial and ongoing eligibility of Tennessee Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database ("NLAD") for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from STANDUP or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. STANDUP thus complies with the requirements of section 54.404 of the FCC's rules. In addition, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers.

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during

the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), STANDUP will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, StandUP contracts with a third party Lifeline service bureau, currently CGM, LLC, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, StandUP ensures that it does not over-request from support funds.

H. STANDUP Will Comply with Certification and Verification Requirements

As mentioned above, STANDUP will rely on the National Verifier for initial and annual verification of Lifeline eligibility in accordance with Section 54.410 of the FCC's Rules.

I. STANDUP Will Comply With Reporting Requirements

STANDUP will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e., FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e., FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs.

J. STANDUP Will Comply With Regulations Imposed By The Commission

By this Application, STANDUP hereby asserts its willingness and ability to comply with the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application. Upon Commission request, STANDUP is prepared to answer questions or present additional testimony or other evidence about its services within the state. STANDUP commits that 100% of federal universal service funds will flow through directly to Lifeline customers.

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

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is "to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies" to all citizens, regardless of geographic location or income.²⁸ Designation of STANDUP as an ETC in Tennessee will further that public interest. Whether because of financial constraints, poor credit history, or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

The instant request for ETC designation must be examined in light of the Act's goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. The FCC has in recent years

²⁸ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”²⁹ Given this context, designating STANDUP as an ETC would significantly benefit low-income consumers eligible for Lifeline services in Tennessee—the intended beneficiaries of universal service.

A. Advantages of STANDUP’s Service Offering

STANDUP offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. The public interest benefits of STANDUP’s wireless service include larger calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile service, and a generous amount of voice and broadband access included without cost (after application of the Lifeline support), as well as free access to caller ID, call waiting, and Voicemail features, and access to 911 services regardless of the number of voice minutes remaining on the Lifeline consumer’s plan. These no cost to consumer services and low-cost minutes are an invaluable resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for “unbanked” consumers.

STANDUP’s Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (meeting the voice and broadband minimum service standards), at no net cost to the customer after

²⁹ See *Lifeline Modernization Order* ¶ 2.

application of Lifeline support. STANDUP's Lifeline offering will be provided over T-Mobile's 4G LTE network. STANDUP's prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues.

In today's market, consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents wherever they may be, allows a person seeking employment greater ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers regardless of location. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.

With the comprehensive strength and experience of STANDUP's management team, the Company's proven technology-based business model, and STANDUP's solid history as a Lifeline provider, STANDUP is uniquely-positioned to meet the needs of Lifeline customers, utilizing the Company's innovative outreach and high integrity enrollment process, and STANDUP remains committed to careful stewardship of the Lifeline program. Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing STANDUP with the authority necessary to offer discounted Lifeline service to those without wireless service—or most in danger of losing service altogether—undoubtedly promotes the public interest.

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.³⁰ Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of STANDUP as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.³¹ Introducing STANDUP into the market as an additional wireless ETC provider will afford low-income Tennessee residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as STANDUP or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, STANDUP will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC’s Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that STANDUP’s customers are not eligible or are receiving duplicative

³⁰ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

³¹ See 47 U.S.C. § 254(b)(1).

support either individually or within their household is greatly minimized. STANDUP's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

VII. CONCLUSION

Based on the foregoing, designation of STANDUP as an ETC in the State of Tennessee satisfies the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, STANDUP respectfully requests that the Commission promptly designate STANDUP as an ETC in the State of Tennessee for the purpose of participating in the Lifeline program.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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*Attorneys for Global Connection Inc. of America
d/b/a STANDUP WIRELESS*

April 20, 2022

EXHIBIT 1

Certification

STATE OF KENTUCKY


)

COUNTY OF CAMPBELL

)

)

I, Eric Schimpf, the Chief Operating Officer of Global Connection Inc. of America d/b/a STANDUP WIRELESS, hereby state upon oath and affirmation of belief and personal knowledge that the matters, facts and statements set forth in the foregoing Petition are true to the best of my knowledge and belief; and that STANDUP meets all the statutory and regulatory requirements for designation as an ETC in the State of Tennessee.



Eric Schimpf, COO
Global Connection Inc. of America
d/b/a STANDUP WIRELESS

EXHIBIT 2

FCC-Approved Compliance Plan

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April 30, 2012

VIA ECFS

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

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

Dear Ms. Dortch:

On March 8, 2012, Global Connection Inc. of America ("Global Connection") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ On April 10, 2012, Global Connection submitted a revised version with a minor revision to its Model Application/Certification Form, included as Exhibit A to its Compliance Plan. Based on a meeting with Commission staff, Global Connection has further revised and supplemented its compliance plan.

Global Connection has revised its Compliance Plan to: 1) confirm in footnote 3 that Global Connection will follow the requirements of its Compliance Plan in all states where it provides Lifeline service and receives reimbursements from the federal Low-Income fund; 2) provide additional detail regarding Global Connection's enrollment process, Company personnel training and potential fraud detection in Sections I.B. and I.F.; 4) provide additional detail regarding Global Connection's handset activation policy in Section I.E.; and 5) revise the agent use box in the Application/Certification Form in Exhibit A.

¹ 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).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 30, 2012
Page Two

Global Connection hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, Global Connection reiterates its request for expeditious approval of its Compliance Plan.

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: Kim Scardino
Divya Shenoy
Charles Tyler
Garnet Hanly
Alex Minard

**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 COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ 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 *Lifeline Reform Order*.²

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Stand Up Wireless (dba), and Global Connection Holdings Corporation (holding company). This Compliance Plan applies only to Global Connection’s wireless Lifeline service offerings.

² 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) (“*Lifeline Reform Order*”). 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).

Lifeline customers. Global Connection will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.³

Global Connection will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.⁴ This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Global Connection will take to implement the obligations contained in the *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.

³ See *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.

⁴ In addition, this Compliance Plan is consistent with the compliance plan filed by Cricket Communications, Inc. See Notice of *Ex Parte* Communication of Cricket Communications, Inc., WC Docket No. 09-197 (Sept. 23, 2011) (“Cricket Compliance Plan”). The Wireline Competition Bureau approved the Cricket Compliance Plan on February 7, 2012. See *Telecommunications Carriers Eligible for Universal Service Support, Cricket Communications, Inc. Petition for Forbearance*, WC Docket No. 09-197, Order, DA 12-158 (Feb. 7, 2012).

ACCESS TO 911 AND E911 SERVICES⁵

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of 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.⁶ The Company will comply with these conditions starting on the effective date of the *Lifeline Reform Order*.

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 service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint and Verizon Wireless as its underlying network provider/carrier. Sprint and Verizon Wireless route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers. To the extent that Sprint or Verizon Wireless is certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended.

⁵ See Compliance Plan Public Notice at 3.

⁶ See *Lifeline Reform Order*, ¶ 373.

Finally, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. The Company uses phones from BDI Logistics LLC that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE⁷

A. Policy

Global Connection will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules (when it becomes effective on June 1, 2012), 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 will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a

⁷ See Compliance Plan Public Notice at 3.

household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules.

In addition, through the certification requirements described below, the Company will confirm 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

More than 90 percent of Global Connection's customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet. At such events, Global Connection requires all prospective customers to show a valid government-issued photo identification, which is electronically scanned to detect alterations. Each prospective customer is checked against Global Connection's internal database in real-time to ensure that the customer does not already receive a Lifeline benefit from the Company before the customer is enrolled.

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 *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and 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 documents acceptable 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.⁸ 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 *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.⁹

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.¹⁰ 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 participation in a qualifying state, federal or Tribal program.¹¹

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

⁸ See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B); Cricket Compliance Plan at 4.

⁹ See Cricket Compliance Plan at 6.

¹⁰ See *Lifeline Reform Order*, ¶ 101.

¹¹ *Id.* and section 54.410(c)(1)(i)(B).

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.¹²

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.¹³ The Company will not retain a copy of this documentation.¹⁴ 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 the reason for such rejection.¹⁵ 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.¹⁶

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 and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹⁷ A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

¹² See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

¹³ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹⁴ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁵ See Cricket Compliance Plan at 6.

¹⁶ See *id.*

¹⁷ See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

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 *Lifeline Reform Order*, together with any additional state certification requirements.¹⁸ 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.¹⁹ Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.²⁰ 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 verbally explain the certifications to consumers when they are enrolling in person or over the phone.²¹

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

¹⁸ *Lifeline Reform Order*, ¶ 61; section 54.410(a).

¹⁹ *See* Cricket Compliance Plan at 3.

²⁰ *See* Model Application/Certification Form, included as Exhibit A. *See* Compliance Plan Public Notice at 3.

²¹ *See Lifeline Reform Order*, ¶ 123.

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 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.²²

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.²³

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²⁴

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name;²⁵ (2) the applicant's full residential address (P.O. Box is not sufficient²⁶); (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

²² See *id.*, ¶ 121; section 54.410(d)(1).

²³ See section 54.405(c).

²⁴ See *Lifeline Reform Order*, ¶ 114.

²⁵ See Cricket Compliance Plan at 4.

²⁶ See *Lifeline Reform Order*, ¶ 87.

which the applicant, his or her dependents, or his or her household receives benefits;²⁷ 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.²⁸

Applicant Certification. Consistent with new 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,²⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the 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;³⁰ (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's

²⁷ See Cricket Compliance Plan at 4.

²⁸ See section 54.410(d)(2). See Cricket Compliance Plan at 4.

²⁹ See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

³⁰ See Cricket Compliance Plan at 4.

knowledge;³¹ (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 below 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.³² The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.³³

D. Annual Verification Procedures

Global Connection will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's

³¹ See *id.* at 5.

³² See *id.*

³³ See Section 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 *id.* See also Cricket Compliance Plan at 5.

knowledge, the subscriber's household is receiving no more than one Lifeline service.³⁴

Further, the verification materials will 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 in the program.³⁵

2012 Verification. Global Connection will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.³⁶ The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

Verification De-Enrollment. Global Connection will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.³⁷ The Company will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

³⁴ See *Lifeline Reform Order*, ¶ 120 and Cricket Compliance Plan at 8.

³⁵ See *Lifeline Reform Order*, ¶ 145.

³⁶ See *id.*, ¶ 130.

³⁷ See *Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

E. Activation and Non-Usage

Global Connection will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.³⁸ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁹ Subscribers can “use” the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.⁴⁰

³⁸ See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

³⁹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3). See Cricket Compliance Plan at 2 (stating that it did not need to implement a non-usage policy because it offered only plans with unlimited local and long distance calling).

⁴⁰ See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴¹

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 will implement 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.⁴²

In addition to checking the database when it becomes available, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers.⁴³ 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.⁴⁴ 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 pass a Company issued exam. The training will be updated as needed, but at least every 90 days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters.

⁴¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁴² See Cricket Compliance Plan at 9.

⁴³ See *id.* at 6, 9.

⁴⁴ See *id.*

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the National Database 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.⁴⁵

One-Per-Household. Global Connection will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household⁴⁶ through the use of its application and 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.⁴⁷ 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 following: (1) an explanation of the Commission’s one-

⁴⁵ See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *id.*, ¶¶ 189-195; section 54.404(b)(6). Further, Company will update each subscriber’s information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

⁴⁶ 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 *Lifeline Reform Order*, ¶ 74; section 54.400(h).

⁴⁷ See *Lifeline Reform Order*, ¶ 78 and Cricket Compliance Plan at 7.

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).⁴⁸ Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, Global Connection will verify with the subscriber every 90 days that the subscriber continues to rely on that address.⁴⁹

Finally, 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 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. Within the deadline provided in the *Lifeline Reform Order*, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service,⁵⁰ (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) what documentation is necessary for enrollment; (7) Global Connection's name (the ETC); and (8) consumers who willfully make a false statement in order to

⁴⁸ *Id.*

⁴⁹ *See Lifeline Reform Order*, ¶ 89.

⁵⁰ *See Cricket Compliance Plan* at 4.

obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.⁵¹ These statements will be 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 forms and certification forms.⁵² This specifically includes the Company's website (www.StandUpWireless.com) and outdoor signage.⁵³ A sample of the Company's marketing materials is included as Exhibit B.

G. Company Reimbursements From the Fund

To ensure that the Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company will certify, 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.⁵⁴ Further, the Company will transition the submission of its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month, and inform USAC, to the extent it deems necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.⁵⁵ In addition, the Company will keep accurate records as directed by USAC⁵⁶ and as required by new section 54.417 of the Commission's rules.

⁵¹ See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

⁵² *Id.*

⁵³ *Id.*

⁵⁴ See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

⁵⁵ See *Lifeline Reform Order*, ¶¶ 302-306.

⁵⁶ See section 54.407(e).

H. Annual Company Certifications

The Company will submit an annual certification to USAC, signed by a Global Connection officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁵⁷ (2) is in compliance with all federal Lifeline certification procedures;⁵⁸ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁵⁹

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁶⁰ Further, as discussed above, Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁶¹

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁶² the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁶³ The

⁵⁷ See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

⁵⁸ See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

⁵⁹ See section 54.416(a)(3).

⁶⁰ See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

⁶¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁶² See section 54.422(c).

⁶³ See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁶⁴ Finally, Global Connection will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.⁶⁵

I. Cooperation with State and Federal Regulators

Global Connection has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;⁶⁶
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

⁶⁴ See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

⁶⁵ See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

⁶⁶ The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁶⁷ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.⁶⁸

II. Description of Lifeline Service Offerings⁶⁹

Global Connection will offer its wireless Lifeline service in the states where it is designated as an ETC⁷⁰ and throughout the coverage area of its underlying provider(s) Sprint and Verizon Wireless. The Company’s Lifeline offering will provide customers with 100 anytime prepaid minutes per month, plus 100 anytime text messages, with rollover, at no charge. Additionally, the Company will offer a 250 anytime talk and text plan without rollover (one minute of talk time for each text). Lifeline customers can purchase additional bundles of minutes in denominations of \$5 (40 minutes), \$10 (100 minutes), \$20 (250 minutes), \$30 (500 minutes) and \$50 (1000 minutes). Airtime “top-up” minutes are available for purchase at the Company’s retail locations, through customer service and on its website. Text messaging is available at the rate of one minute of talk time per text message. Additional information regarding the Company’s plans, rates and services can be found on its website www.StandUpWireless.com.

In addition to free voice services, Global Connection’s Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All plans include domestic long-distance at no extra per minute charge.

⁶⁷ See section 54.405(e)(1).

⁶⁸ See Cricket Compliance Plan at 10.

⁶⁹ See Compliance Plan Public Notice at 3.

⁷⁰ Global Connection is currently designated as an ETC in Arkansas, Louisiana, Maryland, Missouri and West Virginia.

Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷¹

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷² The Compliance Plan Public Notice requires that 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 and has access to capital from its investors. The majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Consequently, Global Connection has not relied, and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

⁷¹ See Compliance Plan Public Notice at 3.

⁷² See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

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."⁷³ Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁷⁴ 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 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 provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that 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-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, Global Connection will not provide toll limitation service ("TLS"), which allows low income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance

⁷³ Compliance Plan Public Notice at 3.

⁷⁴ 47 C.F.R. § 54.202(a)(1).

toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁷⁵

IV. Conclusion

Global Connection submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



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*Counsel to Global Connection Inc. of
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April 30, 2012

⁷⁵ See *Lifeline Reform Order*, ¶ 230.

EXHIBIT A



Global Connection Inc. of America

Global Connection Inc. of America D/B/A StandUP Wireless
State Wireless Lifeline Service Application and Certification

Mail or fax form completed and signed form to:
Fax 1.888.878.9323 / Customer Service: 1.800.544.4441

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America D/B/A StandUP Wireless ("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 that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

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"/> 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's free lunch program |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines |

Customer Application Information:

First Name: _____ Middle Name: _____ Last Name: _____

Date of Birth: Month: ____ Day: ____ Year: _____ Last Four Digits of Social Security Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____

Home Telephone Number (if available): _____

Residential Address (P.O. Box NOT sufficient)

Number: _____ Apt: _____ Street: _____ City: _____

State: _____ Zip Code: _____

Address is (choose one): ☐ Permanent ☐ Temporary

Billing Address (if different from Residential Address) (P.O. Box IS sufficient)

Number: _____ Apt: _____ Street: _____ City: _____

State: _____ Zip Code: _____

Multiple households sharing and 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, and I will complete a separate additional form.

☐ I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

☐ 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 (e.g., name, telephone number and address), 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.

- ☐ 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 below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ 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

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):

☐ 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.

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)
☐ National School Lunch Program's free lunch program
☐ Food Distribution Program on Indian Reservations (FDPIR)
☐ Bureau of Indian Affairs General Assistance (BIA)
☐ Tribally Administered TANF (TATNF)
☐ Head Start (meeting income qualifying standards)
☒ State Program 1
☒ State Program 2

List B - Choose 1:

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

Applicant Account Number	Agent/Dealer Number

EXHIBIT B

FREE

CELL PHONE

FREE MINUTES & TEXTS

See reverse for more info!

250

MINUTES

EACH MONTH.
EVERY MONTH.



ALL qualifying customers get:

FREE Cell Phone
& Activation

1.800.544.4441

www.StandUpWireless.com



Complaints concerning Lifeline/ Linkup service can be directed to the
XXXXX Public Service Commission's Consumer Affairs Unit at 000-000-0000.

FREE

CELL PHONE

FREE MINUTES & TEXTS

See reverse for more info!

100

ANYTIME MINUTES

100

TEXT MESSAGES

EACH MONTH.
EVERY MONTH.
WITH ROLLOVER



ALL qualifying customers get:

FREE Cell Phone
& Activation

1.800.544.4441

www.StandUpWireless.com



Complaints concerning Lifeline/ Linkup service can be directed to the
XXXXX Public Service Commission's Consumer Affairs Unit at 000-000-0000.

FREE

CELL PHONE

FREE MINUTES & TEXTS

See reverse for more info!



1.800.544.4441

www.StandUpWireless.com



IMPORTANT

LIFELINE WIRELESS 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. You must use your phone to continue to receive service.** Should you not use your service for 60 days you will be de-enrolled. **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.

Global Connection Inc. of America

EXHIBIT 3

Coverage Area

State	Zip Codes serviced
TN	37010
TN	37012
TN	37013
TN	37014
TN	37015
TN	37016
TN	37018
TN	37019
TN	37020
TN	37022
TN	37023
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TN	37028
TN	37029
TN	37030
TN	37031
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EXHIBIT 4

Key Management Bios

Eric Schimpf serves as STANDUP's Chief Operating Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless, LLC working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier.

Jennifer Carter serves as STANDUPS's Vice-President of Customer Operations and Compliance Officer. Ms. Carter has held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company.

EXHIBIT 5

Proposed Lifeline Offering

STANDUP WIRELESS LIFELINE OFFERING

	LIFELINE PLANS	VOICE	TEXT (SMS)	DATA High Speed	LIFELINE PRICE
1	Lifeline-Only Broadband	1,000	Unlimited	4.5 GB	\$0.00
2	Lifeline/ACP Bundle \$30	Unlimited	Unlimited	5 GB **	\$0.00*
3	Lifeline/ACP Bundle \$40	Unlimited	Unlimited	10 GB **	\$0.00*
4	Lifeline/ACP Bundle \$50	Unlimited	Unlimited	12 GB **	\$10.00*
5	Lifeline/ACP Bundle \$60	Unlimited	Unlimited	16 GB **	\$20.00*
6	Lifeline/ACP Bundle \$75	Unlimited	Unlimited	25 GB **	\$35.00*
7	Lifeline/ACP Bundle \$110	Unlimited	Unlimited	60 GB **	\$70.00*

*Reflects application of Lifeline discount as well as federal Affordable Connectivity Program (ACP) discount and any company discount.

**ACP bundles include unlimited throttled data after the high-speed allotment has been used.

ADDITIONAL AIRTIME "TOP-UPS"	VOICE	TEXT (SMS)	DATA
\$5.00	250	250	250 MB
\$10.00	None	None	1.5 GB
\$10.00	Unlimited	Unlimited	1 GB
\$20.00	Unlimited	Unlimited	3 GB
\$30.00	Unlimited	Unlimited	8 GB

Top-Ups expire after 30 days

All packages include:

- Free calls to STANDUP Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card

EXHIBIT 6

Sample Advertisements

Unlimited Talk, Text and Data[†]

Free every month when you bundle your Lifeline and ACP Benefits (\$40 Savings)



Tablets
available for as
low as \$10.01
for those that
qualify.

Need Lifeline or ACP not bundled together?

Free Lifeline Only Plan Includes:

1,000 Minutes, Unlimited Text
& 4.5 GB of High-Speed Data

Free ACP Only Plan Includes:

Unlimited Talk, Text and Data[†]
with 5 GB of High-Speed Data

Plan Includes: Unlimited Talk, Text & 10 GB of High-Speed Data – 5G/4G LTE plus Unlimited Additional Data[†]

You can select any available service plan by signing up at standupwireless.com or you can update
your existing service plan by logging into My Account at any time.

Retail Price	Price to You*	Plan
\$30	FREE	Unlimited Talk, Text & Data [†] with 5 GB of High-Speed Data
\$40	FREE	Unlimited Talk, Text & Data[†] with 10 GB of High-Speed Data
\$50	\$10	Unlimited Talk, Text & Data [†] with 12 GB of High-Speed Data
\$60	\$20	Unlimited Talk, Text & Data [†] with 16 GB of High-Speed Data
\$75	\$35	Unlimited Talk, Text & Data [†] with 25 GB of High-Speed Data
\$110	\$70	Unlimited Talk, Text & Data [†] with 60 GB of High-Speed Data

Price to You is applicable when you apply for both Lifeline and ACP. Customer signing up for ACP only will receive \$30.00 off the retail price of the rate plan.

Ask If You Qualify! **standupwireless.com** **1-800-544-4441**

Unresolved questions or complaints may be directed to your local Public Utilities Commission or customers
in the states listed below may direct unresolved questions or complaints to the following organizations:

Colorado Public Utilities Commission: Consumer Affairs – 800-456-0858, 303-894-8070

Georgia Public Service Commission: Consumer Affairs – 800-282-5813, 404-656-4501

Pennsylvania Utility Commission Bureau of Consumer Services – 800-692-7380 or for FDD PA Relay Center 800-682-8706 (voice) or 800-682-8786 (TTY)

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

Massachusetts Consumer Divisions Department of Telecommunications & Cable – 800-392-6066 or 617-305-3531

[†]After monthly allotted 5G/4G LTE data, next 20 GBs at 512 kbps, and remaining data at 128 kbps. Video typically streams in SD (480p). Lower speeds may affect audio and video streaming, access to certain websites and content, or the use of available applications. 5G access requires a 5G-capable device. 5G is not available in all areas. Data usage is subject to our Acceptable Use Policy (AUP). After 55 GBs of data usage in a month, data service will be placed on hold to confirm usage complies with AUP; customers using data consistent with AUP may receive unlimited additional data in 10 GBs increments for the rest of the month by contacting Customer Care. Available speeds will be determined by your particular service plan and may depend on other factors, including your device and network availability. For additional information about broadband speeds, including network limitations and our AUP, visit www.standupwireless.com/broadbandTD. Promotional offers may be modified or withdrawn at any time. Taxes and fees included. Visit www.standupwireless.com for complete terms and conditions.

This is a Lifeline and Affordable Connectivity Program (ACP) supported service. Lifeline and the ACP are separate federal government assistance programs operated by the FCC. Lifeline benefits may be combined with ACP benefits and applied to the same service plan or different service plans. Lifeline and ACP services may be obtained from different service providers. Eligibility for Lifeline and ACP is based on income or participation in certain government benefit programs and is determined by the National Verifier (documentation may be required). Promotional FREE service offer is subject to eligibility, and you must be eligible to be enrolled in either program. Lifeline benefits are non-transferable and limited to one per household (wireless or wireline). An eligible ACP household is limited to one monthly service discount and a single one-time device discount. Connected device benefits require a co-pay of \$10.01. For more information on available devices, visit www.standupwireless.com/support/devices/. Monthly ACP service benefits may be transferred to another provider subject to applicable regulatory restrictions. For Lifeline and ACP eligibility criteria, applicable terms & conditions, and more information about the different programs, call us at 1-800-544-4441 or visit www.standupwireless.com. When the ACP ends or your household is no longer eligible, customers will be subject to our regular undiscounted rates. To enroll in Lifeline only, ACP only or a service plan that includes both Lifeline and ACP discounts, visit us at www.standupwireless.com. Lifeline plans include 1,000 Minutes, Unlimited Text and 4.5 GB of data. A complete listing of our plans, including plans that are fully covered (no co-pay after application of the ACP discount), is available at www.standupwireless.com/acp/plans. Offers may vary by state and service may not be available in all areas. Service provided by Global Connection Inc. of America d/b/a StandUp Wireless.

Llamadas, Textos y Datos Ilimitados*

Gratis cada mes cuando combina sus beneficios de Lifeline y ACP (ahorro de \$40)



Tabletas
disponibles por
tan solo \$ 10.01
para aquellos
que califican.

¿Necesita Lifeline solamente o ACP solamente?

El plan gratis de Lifeline solamente incluye:

1,000 Minutos, Textos Ilimitados y
4.5 GB de Datos de alta velocidad

El plan gratis de ACP solamente incluye:

Llamadas, Textos y Datos*
Ilimitados con 5GB de Datos de
alta velocidad

El plan incluye: Llamadas y Textos Ilimitados y 10 GB de Datos de alta velocidad - 5G/4G LTE más Datos Ilimitados Adicionales*

Puede seleccionar cualquier plan de servicio disponible registrándose en www.standupwireless.com o puede
actualizar su plan de servicio existente iniciando sesión en My Account en cualquier momento.

Precio al por Menor	Precio para Usted*	Plan
\$30	GRATIS	Llamadas, Textos y Datos* Ilimitados con 5 GB de Datos de Alta Velocidad
\$40	GRATIS <small>MEJOR VALOR</small>	Llamadas, Textos y Datos* Ilimitados con 10 GB de Datos de Alta Velocidad
\$50	\$10	Llamadas, Textos y Datos* Ilimitados con 12 GB de Datos de Alta Velocidad
\$60	\$20	Llamadas, Textos y Datos* Ilimitados con 16 GB de Datos de Alta Velocidad
\$75	\$35	Llamadas, Textos y Datos* Ilimitados con 25 GB de Datos de Alta Velocidad
\$110	\$70	Llamadas, Textos y Datos* Ilimitados con 60 GB de Datos de Alta Velocidad

El Precio para Usted se aplica cuando solicita Lifeline y ACP. El cliente que se registre solo en ACP recibirá \$30 de descuento en el precio minorista del plan.

Pregunte si Califica! standupwireless.com 1-800-544-4441

Las preguntas o quejas no resueltas pueden dirigirse a la Comisión de Servicios Públicos o los clientes en los estados
que se enumeran a continuación pueden dirigir preguntas o quejas no resueltas a las siguientes organizaciones:

Comisión de Servicios Públicos de Colorado: Asuntos del Consumidor - 800-456-0858, 303-894-8070

Comisión de Servicios Públicos de Georgia: Asuntos del Consumidor - 800-282-5813, 404-656-4501

Oficina de Servicios al Consumidor de la Comisión de Servicios Públicos de Pensilvania: 800-692-7380 o para el Centro de retransmisión PA de FDD 800-682-8706 (voz) o 800-682-8786 (TTY)

Oficina de Asuntos Públicos y Protección al Consumidor de la Comisión de Kansas: 800-662-0027 o 785-271-3140, TD 800-766-3777

Departamento de Telecomunicaciones y Cable de las Divisiones de Consumidores de Massachusetts - 800-392-6066 o 617-305-3531

* Después de los datos 5G/4G LTE asignados mensualmente, los siguientes 20 GB a 512 kbps y los datos restantes a 128 kbps. El video generalmente se transmite en SD (480p). Las velocidades más bajas pueden afectar la transmisión de audio y video, el acceso a ciertos sitios web y contenido, o el uso de aplicaciones disponibles. El acceso 5G requiere un dispositivo compatible con 5G. 5G no está disponible en todas las áreas. El uso de datos está sujeto a nuestra Política de uso aceptable (AUP). Después del uso de 55 GB de datos en un mes, el servicio de datos se suspenderá para confirmar que el uso cumple con AUP; los clientes que usan datos consistentes con AUP pueden recibir datos adicionales ilimitados en incrementos de 10 GB durante el resto del mes comunicándose con Atención al cliente. Las velocidades disponibles estarán determinadas por su plan de servicio particular y pueden depender de otros factores, incluidos su dispositivo y la disponibilidad de la red. Para obtener información adicional sobre las velocidades de banda ancha, incluidas las limitaciones de la red y nuestra AUP, visite www.standupwireless.com/broadbandTD. Las ofertas promocionales pueden modificarse o retirarse en cualquier momento. Impuestos y tasas incluidos. Visite www.standupwireless.com para conocer los términos y condiciones completos.

Este es un servicio respaldado por Lifeline y el Programa de Descuentos para Internet (ACP). Lifeline y ACP son programas independientes de asistencia del gobierno federal operados por la FCC. Los beneficios de Lifeline pueden combinarse con los beneficios de ACP y aplicarse al mismo plan de servicio o a diferentes planes de servicio. Los servicios de Lifeline y ACP se pueden obtener de diferentes proveedores de servicios. La elegibilidad para Lifeline y ACP se basa en los ingresos o la participación en ciertos programas de beneficios del gobierno y la determina el Verificador Nacional (es posible que se requiera documentación). La oferta de servicio promocional GRATIS está sujeta a elegibilidad, y usted debe ser elegible para inscribirse en cualquiera de los programas. Los beneficios de Lifeline no son transferibles y están limitados a uno por hogar (inalámbrico o fijo). Un hogar ACP elegible está limitado a un descuento de servicio mensual y un descuento de dispositivo único. Los beneficios de dispositivos conectados requieren un copago de \$10.01. Para obtener más información sobre los dispositivos disponibles, visite www.standupwireless.com/support/devices/. Los beneficios del servicio ACP mensual pueden transferirse a otro proveedor sujeto a las restricciones regulatorias aplicables. Para los criterios de elegibilidad de Lifeline y ACP, los términos y condiciones aplicables y más información sobre los diferentes programas, llámenos al 1-800-544-4441 o visite www.standupwireless.com. Cuando termine el ACP o su hogar ya no sea elegible, los clientes estarán sujetos a nuestras tarifas regulares sin descuento. Para inscribirse solo en Lifeline, solo en ACP o en un plan de servicio que incluye descuentos tanto en Lifeline como en ACP, visítenos en www.standupwireless.com. Los planes Lifeline incluyen 1000 minutos, mensajes de texto ilimitados y 4.5 GB de datos. Una lista completa de nuestros planes, incluidos los planes que están completamente cubiertos (sin copago después de la aplicación del descuento ACP), está disponible en www.standupwireless.com/acp/plans. Las ofertas pueden variar según el estado y es posible que el servicio no esté disponible en todas las áreas. Servicio proporcionado por Global Connection Inc. of America d/b/a StandUp Wireless.