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November 7, 2022

VIA ELECTRONIC FILING

Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

Re: Global Connection Inc. of America dba StandUp Wireless
Docket No. 33600
Lifeline Biennial Audit Report Filing

Dear Sir/Madam:

Pursuant to 47 C.F.R. § 54.420 of the Federal Communications Commission's ("FCC") rules, Global Connection Inc. of America dba StandUp Wireless ("Global Connection") provides a copy of its Lifeline Biennial Audit Report ("Report") as issued September 16, 2022, and filed with the FCC on October 13, 2022. This Report covers the audit period of January 1, 2019 through December 31, 2019.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/Lance Steinhart

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dba StandUp Wireless

CLARK SCHAEFER HACKETT
BUSINESS ADVISORS

StandUp Wireless, LLC

Lifeline Assistance Program

January 1, 2019 to December 31, 2019

Independent Accountants' Report

on Applying Agreed-Upon Procedures

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INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

StandUp Wireless, LLC ("Carrier"), the Universal Service Administrative Company ("USAC")
and the Federal Communications Commission ("Commission")

We have performed the procedures enumerated in the Lifeline Biennial Audit Plan, which were agreed to by the Commission's Wireline Competition Bureau ("Bureau") and Office of Managing Director ("OMD") in the Lifeline Biennial Audit Plan or as otherwise directed by the Bureau, related to the Carrier's compliance with certain regulations and orders governing the Low Income Support Mechanism (also known as the Lifeline Program) of the Universal Service Fund, set forth in 47 C.F.R. Part 54, as well as other program requirements, including any state-mandated Lifeline requirements (collectively, the "Rules") detailed in the Lifeline Biennial Audit Plan during the calendar year ended December 31, 2019. The Carrier's management is responsible for its compliance with those specified requirements.

The Carrier's management has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assisting users in determining whether the Carrier complied with the specified requirements. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings are as follows:

Objective I: Carrier Obligation to Offer Lifeline:

Procedure 1

Clark Schaefer Hackett ("CSH") inquired of Carrier management and obtained Carrier policies and procedures for making Lifeline service available to qualifying low-income consumers as provided by the Carrier in response to Request #4 of Appendix A (Requested Documentation) of the Lifeline Biennial Audit Plan. CSH read and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in Appendix F of the Lifeline Biennial Audit Plan.

Results: No exceptions noted.

Procedure 2

CSH inspected examples of Carrier marketing materials describing the Lifeline service (i.e. print, audio, video and Internet materials used to describe or enroll in the Lifeline service offering, including standard scripts used when enrolling new subscribers, and application and certification forms), as provided in response to Request #4, #6 and #7 of Appendix A of the Lifeline Biennial Audit Plan to determine if they included the following:

a. The service is a Lifeline service, which is a government assistance program;
b. The service is non-transferable;
c. Only eligible subscribers may enroll;
d. Only one Lifeline discount is allowed per household; and
e. The Carrier's name or other brand names used to market the service.

Results: No exceptions noted.

Procedure 3

CSH read the Carrier's responses to the background questionnaire regarding the Carrier's policies for (1) how subscribers notify the Carrier of the subscriber's intent to cancel service or give notification that s/he is no longer eligible to receive Lifeline service and (2) when de-enrollment for such notifications occurs. Read these policies to determine they are designed to (1) allow subscribers to make the notifications required by 47 C.F.R. §§54.410(d)(3)(ii) and (iv) and (2) prevent the Carrier from claiming ineligible subscribes on the monthly Snapshot Report or subscribers who wish to cancel service.

CSH called the customer care numbers provided in response to Request # 8 of Appendix A of the Lifeline Biennial Audit Plan, as well as any customer care numbers identified in the marketing materials provided in response to Request # 6 of Appendix A of the Lifeline Biennial Audit Plan, or on the websites provided in response to Request # 7 of Appendix A of the Lifeline Biennial Audit Plan. CSH documented in the report whether (1) each telephone number is operational and (2) if it involves the use of an interactive voice response (IVR) system, that it is possible for an individual to reach a live customer care operator.

Results: CSH read the background questionnaire and noted no exceptions. CSH called the customer service numbers and found them to be operational and CSH was able to reach a live customer care operator for each number.

Procedure 4

CSH inspected the customer's usage records for two months, as provided in response to Request #3 of Appendix E of the Lifeline Biennial Audit Plan. CSH determined if the customer used the service, as defined by 47 C.F.R §54.407(c)(2), within 30 days. The 60 customers sampled for Objective III, Procedure 2 were used to complete the test.

Results: No exceptions noted.

Procedure 5

CSH read applicable policies and procedures regarding de-enrollment from the program, including when the Carrier will de-enroll subscribers based on lack of eligibility, duplicative support, non-usage, and failure to recertify, as further described below.

CSH read the Carrier's policies and procedures for de-enrollment where the Carrier has information indicating that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer under 47 C.F.R. §54.409, as provided in response to Request # 4 of Appendix A of the Lifeline Biennial Audit Plan, as well as de-enrollment letters provided in

response to Request # 11 of Appendix A of the Lifeline Biennial Audit Plan. CSH noted whether the policies and procedures detail the process for communications between the subscriber and the Carrier regarding de-enrollment, including, but not limited to:

a. Notifying subscribers of impending termination of service;
b. Allowing subscribers to demonstrate continued eligibility in 30 days for failure to demonstrate eligibility;
c. De-enrolling the subscriber from Lifeline service in five business days for failure to demonstrate eligibility; and
d. Removal from the National Lifeline Accountability Database ("NLAD") within one business day of de-enrollment. Identify any areas that are not in compliance with section 54.405(e)(1) of the Commission's rules.

CSH read the Carrier's policies and procedures for de-enrolling subscribers that are receiving Lifeline service from another eligible telecommunications carrier or where more than one member of a subscriber's household is receiving Lifeline service (duplicative support). CSH noted if the policies and procedures state that the Carrier will de-enroll subscribers within five business days of receiving notification from USAC program management that a subscriber or a subscriber's household is receiving duplicative Lifeline support, as required by section 54.405(e)(2) of the Commission's rules. CSH also noted the policies and procedures require the removal from NLAD within one business day of de-enrollment from the Lifeline service.

CSH read the Carrier's policies and procedures for de-enrolling subscribers for non-usage (i.e., where a Lifeline subscriber fails to use Lifeline service for 30 consecutive days), including the process of how the Carrier monitors and identifies subscribers who are non-users of Lifeline service but enrolled in the program as well as non-usage termination notifications provided in response to Request # 17 of Appendix A of the Lifeline Biennial Audit Plan. CSH read the policy and procedures and non-usage termination notifications to determine if the termination notifications explain that the subscriber has 15 days following the date of impending termination notification to us the Lifeline service. CSH identified any areas that are not in compliance with section 54.405(e)(3) of the Commission's rules. In addition, CSH read the Carrier's policy and procedures and noted it addressed the Carrier's responsibilities to de-enroll the subscriber after the 15 day non-usage period.

CSH read the Carrier's policies and procedures for de-enrolling a Lifeline subscriber that does not respond to the Carrier's attempts to obtain recertification, as part of the annual eligibility recertification process as well as recertification requests provided in response to Request # 18 of Appendix A of the Lifeline Biennial Audit Plan. CSH read the policies and procedures and recertification requests to determine if the communications explain that the subscriber has 60 days following the date of the notice to demonstrate continued eligibility or the Carrier will terminate the subscriber's Lifeline service and de-enroll the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts. CSH read to confirm the Carrier's policies and procedures also require the Carrier to remove the subscriber from NLAD within one business day of de-enrollment from the Lifeline service. In addition, CSH reviewed the recertification requests and the Carrier's responses to the background questionnaire and determine that the recertification requests were sent by a method separate from the subscriber's bill (if a customer receives a bill from the Carrier). CSH noted any areas that are not in compliance with section 54.405(e)(4) of the Commission's rules.

CSH read the Carrier's policies and procedures for de-enrolling a Lifeline subscriber at the customer's request. CSH confirmed the policies and procedures require de-enrollment from Lifeline service within two business days and removal from NLAD within one business day after de-enrollment from the Lifeline service.

Results: No exceptions noted.

Objective II: Consumer Qualification for Lifeline:

Procedure 1

CSH read procedures the Carrier has in place to ensure it has accurately completed the Snapshot Report in LCS. If the Carrier does not have such procedures, inquired of management to describe the process for completing the Snapshot Report in LCS. The procedures or process should include the following:

a. The process for determining how to ensure accurate claims for subscribers are reflected on the monthly Snapshot reports. Document whether the procedures include cut-off or billing cycle dates, subscribers active as of the start or end of the month, and attaching the correct reason codes when not claiming a subscriber listed on the Snapshot Report, etc.;
b. The process for determining the accurate claim amount of non-Tribal Lifeline, Tribal Lifeline, and Tribal Link Up; and
c. That a verification process exists to perform an independent review; that is, the person reviewing or validating the form's data is different from the person completing the form.

Results: No exceptions noted.

Procedure 2

Obtained the Lifeline Claims System (LCS) Snapshot Report or Subscriber Listing (Opt-Out States) from the Carrier in response to Request #1 of Appendix A of the Lifeline Biennial Audit Plan and compared its total number of subscribers to the number of subscribers reported on the Final Combined Master List created in the Sample Selection section. Confirmed agreement of data where there is overlap of data. Noted any discrepancies in the number of subscribers or data. Investigated reasoning and update Combined Master file necessary.

Results: No exceptions noted.

Procedure 3

Obtained from USAC the NLAD Snapshots for subscribers active for each study area for each month selected in the sampling section described in Section II, item #23. Compared the USAC provided NLAD Snapshot to the Subscriber listing and Combined Master Listing created in the sampling section described in Section II, item #23 of the Lifeline Biennial Audit Plan. Noted any discrepancies in number of subscribers, amount of claims in total, and PII information (name, date of birth, social security number, address).

Results: No exceptions noted.

Procedure 4

CSH inquired of management and obtained the Carrier's policies and procedures for limiting Lifeline support to a single subscription per household as provided by the Carrier in response to Request # 4 of Appendix A of the Lifeline Biennial Audit Plan. CSH read and compared the Carrier's policies and procedures, including any management responses, with the Commission's Lifeline rules set for in 54.409(c) (Appendix F). CSH noted any discrepancies between the policies and procedures and the Commission's rule.

Results: No exceptions noted and no discrepancies noted between the policies and procedures and the Commission's rule.

Procedure 5

CSH used computer-assisted audit techniques, read the Combined Master Listing created per Section II, item #23 of the Lifeline Biennial Audit Plan and noted if there were any duplicate addresses with different subscribers. Determined where these subscribers were claimed for the same month. Created a list reflecting these results.

Results: CSH created a list of subscribers with duplicate address for testing in Procedure #6.

Procedure 6

From the list created in Procedure #5, above, CSH randomly selected 30 subscribers from the list and requested copies from the Carrier of the one-per-household certification form for each of the selected subscribers using Appendix D of the Lifeline Biennial Audit Plan.CSH determined that the subscriber accurately completed a one-per-household certification on the correct form, FCC Form 5631, the Lifeline Program Household Worksheet.

CSH noted the number of missing or incomplete certifications. Even if subscribers enrolled in the program prior to June 2012, the effective date of the one-per-household requirement, at least one subscriber at each address is required to complete a one-per-household worksheet

Results: No exceptions noted and no missing or incomplete certifications noted.

Objective III: Subscriber Eligibility Determination and Certification:

Procedure 1

CSH inquired of management and obtained the Carrier policies and procedures for ensuring that its Lifeline subscribers are eligible to receive Lifeline services as provided by the Carrier in response to Request # 4 of Appendix A of the Lifeline Biennial Audit Plan. In addition, obtained the Carrier's policies and procedures for training employees and agents for ensuring that the Carrier's Lifeline subscribers are eligible to receive Lifeline services, including any policies regarding how the company ensures employees and agents have completed the training. CSH read and compared the policies and procedures, including any management responses, with the Commission's Lifeline rules set for in sections 54.409 and 54.410 (Appendix F). CSH noted any discrepancies between the policies and procedures and the Commission's rules.

CSH read the Carrier's policies and looked for evidence as to whether it includes a policy or procedure that the Carrier must verify the eligibility of each low-income consumer prior to providing Lifeline service to that consumer or providing that consumer with an activated device intended to enable access to Lifeline service.

CSH read the Carrier's policies to determine the process for ensuring subscribers are eligible to receive Lifeline services and have completed all forms necessary to receive the service.

CSH read the Carrier's policies for information regarding the timing, frequency and evidence of completion of the initial and any subsequent Lifeline subscriber eligibility and certification trainings required of the Carrier's employees.

CSH read the Carrier's policies regarding training requirements and Carrier policies for ensuring employees and agents are trained on the use and interaction with the NLAD, including limiting access to NLAD to select individuals and the process for ensuring only subscribers vetted by NLAD are claimed for reimbursement on the Snapshot Report.

For opt-out states CSH read the Carrier's policies regarding training requirements and Carrier policies for ensuring employees and agents are trained on the use and interaction with the NLAD, including limiting access to NLAD to select individuals and the process for ensuring only subscribers vetted by NLAD are claimed for reimbursement on the Snapshot Report.

Results: No exceptions noted and no discrepancies noted between the policies and procedures and the Commission's rules.

Procedure 2

CSH randomly selected 60 subscribers from the two listings created out of the Combined Master Listing and sampling section pursuant to Section II, item #23 of the Lifeline Biennial Audit Plan. Performed the test described below for each of the subscriber's certification/recertification forms obtained using Appendix E of the Lifeline Biennial Audit Plan:

a. CSH read the subscriber certification and recertification forms to determine the forms used were on either the FCC Form 5629, Lifeline Program Application Form, or the FCC Form 5630, Lifeline Program Annual Recertification Form.
b. CSH determined the subscriber completed all the required elements as identified below, including signature and initialing/checkbox requirements contained in the certification and recertification forms:
    a. The subscriber's full name;
    b. The subscriber's full residential address;
    c. Whether the subscriber's residential address is permanent or temporary;
    d. The subscriber's billing address, if different from the subscriber's residential address;
    e. The subscriber's date of birth;
    f. The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
    g. If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in section 54.409, the name of the qualifying

assistance program from which the subscriber, his or her dependents, or his or her household receives benefits;

h. If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in section 54.409, the number of individuals in his or her household; and
i. Initials indicating the subscriber certifies under penalty of perjury, to the following:
    i. The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in section 54.409;
    ii. The subscriber will notify the Carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline service, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
    iii. If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in section 54.400(e);
    iv. If the subscriber moves to a new address, he or she will provide that new address to the Carrier within 30 days;
    v. The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
    vi. The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
    vii. The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
    viii. The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to section 54.405(e)(4).

c. CSH read the subscriber’s certification/recertification form and determined the forms are dated prior to the end of the selected Claims Template data month. If the provided subscriber certification/recertification form is the subscriber’s initial certification form, determined the form is dated prior to or on the same day of the Lifeline start date per the subscriber listing.
d. If applicable, CSH determined if subscribers who received Tribal Lifeline support certified to residing on Tribal lands.
e. CSH read the eligibility documentation the Carrier reviewed to confirm the subscriber’s eligibility obtained using Appendix E of the Lifeline Biennial Audit Plan. CSH determined if the recorded data sources are eligible data sources per 47 CFR § 54.410, such as (1) income or program eligibility databases, (2) income or program eligibility documentation, or (3) confirmation from a state administrator.

Results: No exceptions noted.

Objective IV: Annual Certifications and Recordkeeping by Eligible Telecommunication Carriers:

Procedure 1

CSH inquired of management and obtained Carrier policies and procedures for ensuring that the Carrier has made and submitted the annual certifications require under sections 54.416 (i.e., FCC Form 555) and 54.422 (i.e., FCC Form 481) of the Commission's rules, as provided by the Carrier in response to Request # 4 of Appendix A of the Lifeline Biennial Audit Plan. CSH read and compared the Carrier policies and procedures, including any management responses, with the Commission's Lifeline rules set forth in sections 54.416 and 54.522 (Appendix F).

Results: No exceptions noted.

Procedure 2

CSH read the Carrier's FCC Form 555 that was filed the January following the audit period provided by the Carrier in response to Request # 12 of Appendix A of the Lifeline Biennial Audit Plan. CSH determined if the Carrier made all of the following certifications. An officer of each eligible telecommunications company must certify that he or she understands the Commission's Lifeline rules and requirements and that the Carrier:

a. Has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services;
    i. In instances where an Carrier confirms consumer eligibility by relying on income or eligibility databases, as defined in 47 C.F.R. § 54.410(b)(1)(i)(A) or (c)(1)(i)(A), the representative must attest annually as to what specific data sources the Carrier used to confirm eligibility
b. Is in compliance with all federal Lifeline certification procedures; and
c. Is in compliance with the minimum service levels set forth in 47 C.F.R. § 54.408.

Results: No exceptions noted.

Procedure 3

CSH read the Carrier's organizational chart provided by the Carrier in response to Request # 5 of Appendix A of the Lifeline Biennial Audit Plan. CSH determined if the certifying officer on the FCC Form 555 is an officer per the organizational chart or other publicly available documents.

Results: No exceptions noted.

Procedure 4

Compared the subscriber count per the FCC Form 555 with the total subscriber count per the October 2019 Snapshot Report provided by the Carrier in response to Request # 14 of Appendix A of the Lifeline Biennial Audit Plan.

Results: No exceptions noted.

Procedure 5

Compared the recertification data report on the FCC Form 555 with the detailed recertification results provided by the Carrier in response to Request # 9 of Appendix A of the Lifeline Biennial Audit Plan.

Results: No exceptions noted.

Procedure 6

Compared the non-usage data reported on the FCC Form 555 for the selected month with the detailed non-usage results provided by the Carrier in response to Request # 10 of Appendix A of the Lifeline Biennial Audit Plan.

Results: No exceptions noted.

Procedure 7

CSH read the Carrier's Form 481, as provided by the Carrier in response to Request # 13 of Appendix A of the Lifeline Biennial Audit Plan. CSH determined if the Carrier reported all the information and made all the certifications required by 47 CFR § 54.422(a) and (b).

Results: No exceptions noted.

Procedure 8

CSH read supporting schedules related to the Carrier's FCC Form 481, as provided by the Carrier in response to Request # 15 and 16 of Appendix A of the Lifeline Biennial Audit Plan. CSH compared the data reported on the FCC Form 481 with the supporting schedules.

Results: No exceptions noted.

Procedure 9

CSH inquired of management and obtained the Carrier policies and procedures for maintaining records that document compliance with the Lifeline program rules, as provided by the Carrier in response to Request # 4 of Appendix A of the Lifeline Biennial Audit Plan. CSH read and compared the policies and procedures, including any management responses, with recordkeeping rules set forth in 47 CFR § 54.417.

Results: No exceptions noted.

We were engaged by the Carrier's management to perform this agreed-upon procedures engagement and conducted our engagement in accordance with U.S. generally accepted government auditing standards as established by the Government Accountability Office, which incorporate attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance with specified requirements.

Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Carrier, USAC, and the Commission and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the managements of the Carrier, USAC, and the Commission, and is not intended to be, and should not be, used by anyone other than those specified parties. This report becomes a matter of public record when the final report is filed with the Commission. The final report is not confidential.

Clark, Schaefer, Hackett & Co.

Columbus, Ohio
September 16, 2022