**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

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| Petition of IM Telecom LLC d/b/a Infiniti Mobile to Expand its Eligible Telecommunications Carrier Service Area | Docket No. 40193 |

# PETITION OF IM TELECOM LLC D/B/A INFINITI MOBILE TO EXPAND ITS ELIGIBLE TELECOMMUNICATIONS CARRIER SERVICE AREA

## I. INTRODUCTION

IM Telecom, LLC d/b/a Infiniti Mobile (IM Telecom 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 Georgia Public Service Commission's (Commission) rules and regulations, hereby files this petition to expand IM Telecom's Eligible Telecommunications Carrier (ETC) service area in the State of Georgia (Petition). The Commission designated IM Telecom as an ETC by Order on November 7, 2016, in Docket No. 40193 (ETC Designation Order).[3] IM Telecom requests to expand its ETC service area to provide Lifeline service to additional qualifying Georgia households. Specifically, IM Telecom seeks to expand its ETC designated service area to be statewide subject to the wireless network coverage of its underlying carriers (*i.e.*, AT&T Mobility (AT&T), T-Mobile US, Inc. (T-Mobile) and Verizon Wireless

[1] 47 U.S.C. § 214(e)(2).

[2] 47 C.F.R. §§ 54.101-54.207.

[3] *See generally Application of IM Telecom, LLC d/b/a Infiniti Mobile for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, Order on Application for Designation as an Eligible Telecommunications Carrier (Docket No. 40193) (Document No. 165838) (Nov. 7, 2016) (ETC Designation Order).

(Verizon)). The Company does not seek access to Universal Service Fund (USF) support for the purpose of providing service to high-cost areas.

As demonstrated herein, and as certified by attached Exhibit 1, IM Telecom continues to meet all applicable statutory and regulatory requirements for designation as an ETC.[4] The Commission's grant of IM Telecom's Petition would advance the public interest by enabling the Company to expand the availability of Lifeline service to substantially more low-income consumers in Georgia. Accordingly, IM Telecom 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] *See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42 and 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) (*2012 Lifeline Reform Order*); *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) *Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197, Order on Reconsideration, Memorandum Opinion and Order, FCC 17-155 (rel. Dec. 1, 2017); *Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197, Fifth Report and Order and Memorandum Opinion and Order and Order on Reconsideration, FCC 19-111 (rel. Nov. 14, 2019).

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with a copy to:

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## II. DESIGNATED SERVICE AREA

In the ETC Designation Order, the Commission designated IM Telecom as an ETC to provide wireless Lifeline service in its underlying carrier Sprint Spectrum L.P.'s (Sprint) service area.[5] In order to best serve its customers and provide quality service and coverage throughout Georgia, IM Telecom has added AT&T and Verizon as additional underlying carriers that have service coverage areas within Georgia.[6] IM Telecom also relies on T-Mobile as an underlying carrier since Sprint and T-Mobile have merged. IM Telecom customers benefit from AT&T, T-Mobile, and Verizon's ability to remain functional in emergency situations, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

IM Telecom seeks to revise its ETC designated service area to be statewide, subject to the wireless network coverage of its underlying carriers, including as those carriers' network

[5] *See* ETC Designation Order, at 2, *e.g.*, *Application of IM Telecom, LLC d/b/a Infiniti Mobile for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, Application (filed Jan. 21, 2016), at 13-14 and Exhibit 6.

[6] In 2020, Sprint and T-Mobile merged to form T-Mobile US, Inc. In June 2022, IM Telecom's access to the legacy Sprint network was discontinued. Service that had previously been provided on Sprint's network is now provided on T-Mobile's network.

coverage may change or expand going forward. For the Commission's reference, a list of the current ZIP codes associated with IM Telecom's expanded ETC service area is attached as Exhibit 2. However, as noted above, IM Telecom requests a statewide ETC designation that is not limited to particular ZIP codes.

## III. IM TELECOM MEETS APPLICABLE REQUIREMENTS

The FCC's rules set forth the information that must be contained in an application for ETC designation.[7] In its initial ETC Petition, incorporated herein by reference, IM Telecom provided all the information required by the FCC's rules in effect at the time, including those set forth in the *2012 Lifeline Reform Order*. The Commission found in its ETC Designation Order that IM Telecom met the requirements for designation as an ETC. IM Telecom has complied with the conditions in the ETC Designation Order and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and as certified to in the attached verification, IM Telecom will comply with the service requirements applicable to the support that it receives. IM Telecom also provides the following additional information to address FCC rules governing the Lifeline program that were amended after the Company's ETC Designation Order was issued.

### A. IM Telecom Will Continue to Provide All Supported Services

IM Telecom will continue to provide all supported services required by Section 54.101(a) of the FCC's Rules[8] throughout its requested service area in the State of Georgia, including voice telephone service and broadband Internet access service. IM Telecom commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. IM Telecom also commits to meeting

[7] *See* 47 C.F.R. §§ 54.101 - 54.207.

[8] 47 C.F.R. § 54.101(a).

any additional requirements established by the Commission to qualify for Georgia USF support. The Company's current Lifeline offering is attached as Exhibit 3, and its Terms and Conditions are available on its website.[9] IM Telecom currently offers these Lifeline wireless plans throughout its existing service area in Georgia.

### B. IM Telecom's Processes Comply with the Lifeline Verification and Enrollment Processes, and the Company Remains Committed to Preventing Waste, Fraud and Abuse of the Lifeline Program

Section 54.410 of the FCC's rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. IM Telecom has processes in place to facilitate compliance with federal customer enrollment requirements. Specifically, the Company relies on the National Verifier and the National Lifeline Accountability Database (NLAD), each of which is administered by USAC, to determine an applicant's eligibility for Lifeline service (except in California, where the Company follows specific state requirements). Every applicant is required to complete the standardized Lifeline application in the National Verifier environment, which covers the necessary information collection, disclosures, and certifications required by Section 54.410(d) of the Lifeline rules.[10] For applicants verified as being eligible by USAC's National Verifier and NLAD, IM Telecom completes enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules. IM Telecom also: (1) informs the customer of his or her need to use the service at least once every thirty (30) days as required by Section 54.407(c)(2); (2) provides notice to subscribers after 30 days of non-usage that they must use the service within 15 days or their service will be terminated as required by Section 54.405(e)(3); and (3) requires the customers to activate their Lifeline service as required

[9] *See* https://infinitimobile.com/terms/.

[10] 47 C.F.R. § 54.410(d).

by Section 54.407(c)(1). IM Telecom does not provide a customer with a handset (if the customer qualifies for a free handset) or otherwise activate Lifeline service until the applicant completes the application in the National Verifier and receives eligibility approval.[11]

IM Telecom has additional processes in place to guard against waste, fraud, and abuse, and to ensure compliance with FCC rules designed to achieve that objective, including customer usage, cure period, and de-enrollment requirements set forth in Sections 54.407(c)(2) and 54.405(e)(3), general notice and de-enrollment requirements set forth in Section 54.405(e)(1), transmission of information to NLAD and recordkeeping requirements set forth in Sections 54.404(b)(6) and 54.417, annual certification and reporting requirements set forth in Sections 54.416 and 54.420, and reimbursement claims processes established by USAC consistent with Sections 54.403 and 54.407(a). IM Telecom also complies with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and coordinates with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.[12] If IM Telecom receives a request for de-enrollment from a subscriber, it processes the request within two (2) business days in accordance with Section 54.405(e)(5).

IM Telecom has direct contact with all applicants for Infiniti's Lifeline service, either in person through its employees, agents, or representatives, or via the telephone, mail, or online. IM Telecom does not enroll customers at retail locations where the Company does not have an agency agreement with the retailer. In addition, in accordance with Section 54.406 of the FCC's rules, IM Telecom enrollment representatives are required to register in USAC's Representative

[11] 47 C.F.R. 54.410(a).

[12] 47 C.F.R. §§ 54.405(e), 54.410(f).

Accountability Database (RAD), and Infiniti does not offer or provide enrollment representatives or their direct supervisors any commission compensation based on the number of consumers who apply for or are enrolled in the Lifeline program with the Company.[13]

Finally, IM Telecom provides or requires Lifeline-specific training for all personnel, whether employees, direct contractors, or representatives, who interact with new or prospective customers regarding the FCC's Lifeline eligibility and certification rules and the Company's practices and policies designed to implement those rules. IM Telecom has a zero-tolerance policy for waste, fraud, and abuse, and personnel are instructed to notify the Company's compliance team if they suspect that anyone might be providing false information or attempting to obtain a duplicate Lifeline benefit.

## IV. EXPANSION OF IM TELECOM'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

In its ETC Designation Order, the Commission found that designation of IM Telecom as an ETC would serve the public interest. Similarly, expansion of IM Telecom's ETC service area to include all areas where its underlying carriers have coverage will serve the public interest by increasing the number of low-income households that can benefit from the Company's high quality mobile voice, text and data services. IM Telecom's online and in-person, real-time distribution methods, which rely upon Internet-enabled compliance checks, will enable the Company to bring Lifeline service to eligible consumers throughout its expanded service area. Moreover, IM Telecom's Lifeline rate plans allow feature-rich mobile connectivity for qualifying subscribers at low cost to subscribers without the burden of credit checks or contracts.

[13] 47 C.F.R. § 54.406(b).

The Commission's grant of IM Telecom's request to expand its designated service area also would promote competition and increase customer choice for low-income households residing in the expanded service area. Indeed, its presence as a competitor will lead to additional competition within the Lifeline market, especially throughout its expanded service area, that should help improve the rate of program participation by eligible subscribers. For the foregoing reasons, grant of this Petition is in the public interest.

## V. CONCLUSION

Based on the foregoing, IM Telecom respectfully requests that the Commission promptly grant this Petition and expand IM Telecom's Lifeline-only ETC service area to be statewide subject to the wireless network coverage of its underlying carriers.

Respectfully submitted,



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December 29, 2022

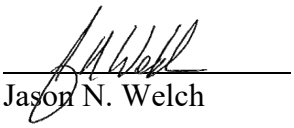
**EXHIBIT 1**

**Verification**

## VERIFICATION

I, Jason N. Welch, President of IM Telecom, LLC (IM Telecom), am authorized to sign this verification on behalf of IM Telecom. I have reviewed the facts set forth in the foregoing petition and verify that facts relating to IM Telecom are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at any hearing held in this matter. I further certify that IM Telecom will comply with the service requirements applicable to the low-income universal service support it receives

Date: December 21, 2022



Jason N. Welch

# EXHIBIT 2

## Service Coverage Area

**IM Telecom, LLC d/b/a Infiniti Mobile**
**Georgia Service Area ZIP Codes**

| | | | | | | |
|---|---|---|---|---|---|---|
| 30002 | 30049 | 30102 | 30151 | 30224 | 30292 | 30342 |
| 30003 | 30052 | 30103 | 30152 | 30228 | 30293 | 30343 |
| 30004 | 30054 | 30104 | 30153 | 30229 | 30294 | 30344 |
| 30005 | 30055 | 30105 | 30154 | 30230 | 30295 | 30345 |
| 30006 | 30056 | 30106 | 30156 | 30233 | 30296 | 30346 |
| 30007 | 30058 | 30107 | 30157 | 30234 | 30297 | 30348 |
| 30008 | 30060 | 30108 | 30160 | 30236 | 30298 | 30349 |
| 30009 | 30061 | 30109 | 30161 | 30237 | 30301 | 30350 |
| 30010 | 30062 | 30110 | 30162 | 30238 | 30302 | 30353 |
| 30011 | 30063 | 30111 | 30163 | 30240 | 30303 | 30354 |
| 30012 | 30064 | 30112 | 30164 | 30241 | 30304 | 30355 |
| 30013 | 30065 | 30113 | 30165 | 30248 | 30305 | 30356 |
| 30014 | 30066 | 30114 | 30168 | 30250 | 30306 | 30357 |
| 30015 | 30067 | 30115 | 30169 | 30251 | 30307 | 30358 |
| 30016 | 30068 | 30116 | 30170 | 30252 | 30308 | 30359 |
| 30017 | 30069 | 30117 | 30171 | 30253 | 30309 | 30360 |
| 30018 | 30070 | 30118 | 30172 | 30256 | 30310 | 30361 |
| 30019 | 30071 | 30119 | 30173 | 30257 | 30311 | 30362 |
| 30021 | 30072 | 30120 | 30175 | 30258 | 30312 | 30363 |
| 30022 | 30074 | 30121 | 30176 | 30259 | 30313 | 30364 |
| 30023 | 30075 | 30122 | 30177 | 30260 | 30314 | 30366 |
| 30024 | 30076 | 30123 | 30178 | 30261 | 30315 | 30368 |
| 30025 | 30077 | 30124 | 30179 | 30263 | 30316 | 30369 |
| 30026 | 30078 | 30125 | 30180 | 30264 | 30317 | 30370 |
| 30028 | 30079 | 30126 | 30182 | 30265 | 30318 | 30371 |
| 30029 | 30080 | 30127 | 30183 | 30266 | 30319 | 30374 |
| 30030 | 30081 | 30129 | 30184 | 30268 | 30320 | 30375 |
| 30031 | 30082 | 30132 | 30185 | 30269 | 30321 | 30377 |
| 30032 | 30083 | 30133 | 30187 | 30270 | 30322 | 30378 |
| 30033 | 30084 | 30134 | 30188 | 30271 | 30324 | 30380 |
| 30034 | 30085 | 30135 | 30189 | 30272 | 30325 | 30384 |
| 30035 | 30086 | 30137 | 30204 | 30273 | 30326 | 30385 |
| 30036 | 30087 | 30138 | 30205 | 30274 | 30327 | 30388 |
| 30037 | 30088 | 30139 | 30206 | 30275 | 30328 | 30392 |
| 30038 | 30090 | 30140 | 30212 | 30276 | 30329 | 30394 |
| 30039 | 30091 | 30141 | 30213 | 30277 | 30331 | 30396 |
| 30040 | 30092 | 30142 | 30214 | 30281 | 30332 | 30398 |
| 30041 | 30093 | 30143 | 30215 | 30284 | 30333 | 30401 |
| 30042 | 30094 | 30144 | 30216 | 30285 | 30334 | 30410 |
| 30043 | 30095 | 30145 | 30217 | 30286 | 30336 | 30411 |
| 30044 | 30096 | 30146 | 30218 | 30287 | 30337 | 30412 |
| 30045 | 30097 | 30147 | 30219 | 30288 | 30338 | 30413 |
| 30046 | 30098 | 30148 | 30220 | 30289 | 30339 | 30414 |
| 30047 | 30099 | 30149 | 30222 | 30290 | 30340 | 30415 |
| 30048 | 30101 | 30150 | 30223 | 30291 | 30341 | 30417 |

**IM Telecom, LLC d/b/a Infiniti Mobile**
**Georgia Service Area ZIP Codes**

| | | | | | | |
|---|---|---|---|---|---|---|
| 30420 | 30506 | 30560 | 30638 | 30733 | 30904 | 31035 |
| 30421 | 30507 | 30562 | 30639 | 30734 | 30905 | 31036 |
| 30423 | 30510 | 30563 | 30641 | 30735 | 30906 | 31037 |
| 30424 | 30511 | 30564 | 30642 | 30736 | 30907 | 31038 |
| 30425 | 30512 | 30565 | 30643 | 30738 | 30909 | 31039 |
| 30426 | 30513 | 30566 | 30645 | 30739 | 30912 | 31040 |
| 30427 | 30514 | 30567 | 30646 | 30740 | 30914 | 31041 |
| 30428 | 30515 | 30568 | 30647 | 30741 | 30916 | 31042 |
| 30429 | 30516 | 30571 | 30648 | 30742 | 30917 | 31044 |
| 30434 | 30517 | 30572 | 30650 | 30746 | 30919 | 31045 |
| 30436 | 30518 | 30573 | 30655 | 30747 | 30999 | 31046 |
| 30438 | 30519 | 30575 | 30656 | 30750 | 31001 | 31047 |
| 30439 | 30520 | 30576 | 30660 | 30751 | 31002 | 31049 |
| 30441 | 30521 | 30577 | 30662 | 30752 | 31003 | 31050 |
| 30442 | 30522 | 30580 | 30663 | 30753 | 31004 | 31051 |
| 30445 | 30523 | 30581 | 30664 | 30755 | 31005 | 31052 |
| 30446 | 30525 | 30582 | 30665 | 30756 | 31006 | 31054 |
| 30447 | 30527 | 30597 | 30666 | 30757 | 31007 | 31055 |
| 30448 | 30528 | 30598 | 30667 | 30802 | 31008 | 31057 |
| 30449 | 30529 | 30599 | 30668 | 30803 | 31009 | 31058 |
| 30450 | 30530 | 30601 | 30669 | 30805 | 31010 | 31059 |
| 30451 | 30531 | 30602 | 30671 | 30806 | 31011 | 31060 |
| 30452 | 30533 | 30603 | 30673 | 30807 | 31012 | 31061 |
| 30453 | 30534 | 30604 | 30677 | 30808 | 31013 | 31062 |
| 30454 | 30535 | 30605 | 30678 | 30809 | 31014 | 31063 |
| 30455 | 30536 | 30606 | 30680 | 30810 | 31015 | 31064 |
| 30456 | 30537 | 30607 | 30683 | 30811 | 31016 | 31065 |
| 30457 | 30538 | 30608 | 30701 | 30812 | 31017 | 31066 |
| 30458 | 30539 | 30609 | 30703 | 30813 | 31018 | 31067 |
| 30459 | 30540 | 30612 | 30705 | 30814 | 31019 | 31068 |
| 30460 | 30541 | 30619 | 30707 | 30815 | 31020 | 31069 |
| 30461 | 30542 | 30620 | 30708 | 30816 | 31021 | 31070 |
| 30464 | 30543 | 30621 | 30710 | 30817 | 31022 | 31071 |
| 30467 | 30545 | 30622 | 30711 | 30818 | 31023 | 31072 |
| 30470 | 30546 | 30623 | 30719 | 30819 | 31024 | 31075 |
| 30471 | 30547 | 30624 | 30720 | 30820 | 31025 | 31076 |
| 30473 | 30548 | 30625 | 30721 | 30821 | 31026 | 31077 |
| 30474 | 30549 | 30627 | 30722 | 30822 | 31027 | 31078 |
| 30475 | 30552 | 30628 | 30724 | 30823 | 31028 | 31079 |
| 30477 | 30553 | 30629 | 30725 | 30824 | 31029 | 31081 |
| 30499 | 30554 | 30630 | 30726 | 30828 | 31030 | 31082 |
| 30501 | 30555 | 30631 | 30728 | 30830 | 31031 | 31083 |
| 30502 | 30557 | 30633 | 30730 | 30833 | 31032 | 31084 |
| 30503 | 30558 | 30634 | 30731 | 30901 | 31033 | 31085 |
| 30504 | 30559 | 30635 | 30732 | 30903 | 31034 | 31086 |

**IM Telecom, LLC d/b/a Infiniti Mobile**
**Georgia Service Area ZIP Codes**

| | | | | | | |
|---|---|---|---|---|---|---|
| 31087 | 31221 | 31415 | 31558 | 31699 | 31778 | 31836 |
| 31088 | 31294 | 31416 | 31560 | 31701 | 31779 | 31901 |
| 31089 | 31295 | 31418 | 31561 | 31702 | 31780 | 31902 |
| 31090 | 31296 | 31419 | 31562 | 31703 | 31781 | 31903 |
| 31091 | 31297 | 31420 | 31563 | 31704 | 31782 | 31904 |
| 31092 | 31301 | 31421 | 31564 | 31705 | 31783 | 31905 |
| 31093 | 31302 | 31501 | 31565 | 31706 | 31784 | 31906 |
| 31094 | 31303 | 31502 | 31566 | 31707 | 31787 | 31907 |
| 31095 | 31304 | 31503 | 31567 | 31708 | 31788 | 31908 |
| 31096 | 31305 | 31510 | 31568 | 31709 | 31789 | 31909 |
| 31097 | 31307 | 31512 | 31569 | 31711 | 31790 | 31914 |
| 31098 | 31308 | 31513 | 31598 | 31712 | 31791 | 31917 |
| 31099 | 31309 | 31515 | 31599 | 31714 | 31792 | 31993 |
| 31106 | 31310 | 31516 | 31601 | 31716 | 31793 | 31995 |
| 31107 | 31312 | 31518 | 31602 | 31719 | 31794 | 31997 |
| 31119 | 31313 | 31519 | 31603 | 31720 | 31795 | 31998 |
| 31126 | 31314 | 31520 | 31604 | 31721 | 31796 | 31999 |
| 31131 | 31315 | 31521 | 31605 | 31722 | 31798 | 39813 |
| 31136 | 31316 | 31522 | 31606 | 31727 | 31799 | 39815 |
| 31139 | 31318 | 31523 | 31620 | 31730 | 31801 | 39817 |
| 31141 | 31319 | 31524 | 31622 | 31733 | 31803 | 39818 |
| 31144 | 31320 | 31525 | 31623 | 31735 | 31804 | 39819 |
| 31145 | 31321 | 31527 | 31624 | 31738 | 31805 | 39823 |
| 31146 | 31322 | 31532 | 31625 | 31739 | 31806 | 39824 |
| 31150 | 31323 | 31533 | 31626 | 31743 | 31807 | 39825 |
| 31156 | 31324 | 31534 | 31627 | 31744 | 31808 | 39826 |
| 31169 | 31326 | 31535 | 31629 | 31747 | 31810 | 39827 |
| 31192 | 31327 | 31537 | 31630 | 31749 | 31811 | 39828 |
| 31193 | 31328 | 31539 | 31631 | 31750 | 31812 | 39829 |
| 31195 | 31329 | 31542 | 31632 | 31753 | 31814 | 39832 |
| 31196 | 31331 | 31543 | 31634 | 31756 | 31815 | 39834 |
| 31201 | 31333 | 31544 | 31635 | 31757 | 31816 | 39836 |
| 31202 | 31401 | 31545 | 31636 | 31758 | 31820 | 39837 |
| 31203 | 31402 | 31546 | 31637 | 31760 | 31821 | 39840 |
| 31204 | 31403 | 31547 | 31638 | 31763 | 31822 | 39841 |
| 31205 | 31404 | 31548 | 31639 | 31764 | 31823 | 39842 |
| 31206 | 31405 | 31549 | 31641 | 31765 | 31824 | 39845 |
| 31207 | 31406 | 31550 | 31642 | 31768 | 31825 | 39846 |
| 31208 | 31407 | 31551 | 31643 | 31769 | 31826 | 39851 |
| 31210 | 31408 | 31552 | 31645 | 31771 | 31827 | 39852 |
| 31211 | 31409 | 31553 | 31647 | 31772 | 31829 | 39854 |
| 31213 | 31410 | 31554 | 31648 | 31773 | 31830 | 39859 |
| 31216 | 31411 | 31555 | 31649 | 31774 | 31831 | 39861 |
| 31217 | 31412 | 31556 | 31650 | 31775 | 31832 | 39862 |
| 31220 | 31414 | 31557 | 31698 | 31776 | 31833 | 39866 |

**IM Telecom, LLC d/b/a Infiniti Mobile**
**Georgia Service Area ZIP Codes**

39867
39870
39877
39885
39886
39897
39901

# EXHIBIT 3

## Lifeline Offering

# IM Telecom, LLC d/b/a Infiniti Mobile

Lifeline Rate Plans

## Non-Tribal:

| Plan | Minutes | Text | Data | Retail Price | Federal Lifeline Discount | State Lifeline Discount | Federal ACP Discount | Company Contribution | Net Cost to Lifeline Customer |
|---|---|---|---|---|---|---|---|---|---|
| **Infiniti Enhanced Plan** | 3,000 anytime voice minutes | Unlimited texts | 4.5 GB | $30.00 | - $9.25 | -$6.00 | N/A | -$0.75 | **$14.00** |
| **Infiniti Essentials Plan** | 1,000 anytime voice minutes | 1,000 texts | 1 GB | $20.00 | - $5.25 | N/A | N/A | -$0.75 | **$14.00** |
| **Infiniti Extreme (ACP + Lifeline)** | Unlimited anytime voice minutes | Unlimited texts | 6 GB | $75.00 | - $9.25 | -$6.00 | -$30.00 | -$29.75 | **$0.00** |

## All Plans include the following:

- Free phone
- Calls to 911 emergency services
- Calls to Customer Service
- Access to Voicemail, Caller-ID, Call-Waiting, Call-Forwarding, and 3-Way Calling features
- Domestic, Long-Distance Calls

## Top Ups:

- $10.00 for 1,000 minutes and 1,000 texts
- $10.00 for 1GB Refill
- $20.00 for 2GB Refill
- $30.00 for 4GB Refill

Complete program terms of use located at http://infinitimobile.com/terms/