BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

TruConnect Communications, Inc.	)	
	)	Docket No. _____
Application for Designation as an	)	
Eligible Telecommunications Carrier	)	
	)	

APPLICATION OF TRUCONNECT COMMUNCIATIONS, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF GEORGIA

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I. INTRODUCTION

TruConnect Communications, Inc. ("TruConnect" or the "Company"), 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 Georgia Public Service Commission ("Commission") namely, Georgia Compiled Rules and Regulations Rule 515-12-1-.35,[3] hereby submits this Application for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Georgia ("Application").

TruConnect seeks ETC designation solely to provide Lifeline service to qualifying Georgia 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.[4] As demonstrated herein, and as certified in Exhibit 1 attached hereto, TruConnect meets all the statutory and regulatory requirements for designation

[1] 47 U.S.C. § 214(e)(2)

[2] 47 C.F.R. §§ 54.101-54.207.

[3] Ga. Comp. R. & Regs. R. 515-12-1-.35 (2021).

[4] 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.

as an ETC in the State of Georgia, including the requirements outlined in the FCC's *Lifeline and Link Up Reform Order*,[5] *Lifeline Modernization Order*,[6] and *Fifth Report and Order*.[7] Furthermore, TruConnect is positioned to reach unserved and underserved Lifeline-eligible consumers. Rapid grant of TruConnect'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 Georgia residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to TruConnect's undersigned counsel and:

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[5] *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*").

[6] *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) ("*Lifeline Modernization Order*").

[7] *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) ("*Fifth Report and Order*").

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II. COMPANY OVERVIEW

TruConnect is a Delaware corporation with its principal office located at 1149 S. Hill Street, Suite H-400, Los Angeles, California 90015. TruConnect is authorized to do business in Georgia. TruConnect Communications, Inc., formerly Telscape Communications, Inc., is a subsidiary of TSC Acquisition Corporation ("TSC"). TSC also owns Sage Telecom Communications, LLC d/b/a TruConnect ("Sage d/b/a TruConnect"), formerly known as Sage Telecom, Inc. before a corporate restructuring in 2012. The owners of TSC separately own TruConnect Mobile, LLC, which sells mobile hotspot devices and low-cost monthly data plans, as well as TruConnect Technologies, LLC, a mobile data analytics company that develops data intelligence products and services for wireless carriers, cable operators, and content providers.

TruConnect provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of facilities-based providers, T-Mobile USA, Inc. ("T-Mobile") and Verizon Wireless ("Verizon") (collectively, "Underlying Carriers") on a wholesale basis to offer nationwide service. TruConnect is currently designated and operating as a wireless ETC in California, New Jersey, Massachusetts, Rhode Island, Vermont, Tennessee, Virginia, and the U.S. Virgin Islands. TruConnect is also authorized by the FCC and the Universal Service Administrative Company ("USAC") to participate in the Affordable Connectivity Program ("ACP") throughout the United States, including Georgia.

TruConnect's prepaid wireless services are affordable, easy to use, and attractive to low-income consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends

and family and for contacting prospective employers. TruConnect offers consumers simple and affordable prepaid calling plans, easy-to-use handsets, and high-quality customer service. Given its pricing and marketing strategy and the demographics of its customers in other states, TruConnect anticipates that many of its customers will be from low-income backgrounds who have not previously enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. TruConnect does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers, TruConnect will expand the availability of wireless services to many more consumers, which is the principal reason for which Congress created the universal service program.

TruConnect'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". TruConnect may provide user-friendly handsets or hotspot devices. TruConnect'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. TruConnect 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 TruConnect service to suit their needs with available bundles of minutes and broadband data to supplement their monthly plan.

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

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.[8] 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.[9] 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). As demonstrated in this Application, TruConnect meets these requirements. TruConnect requests that the Commission expeditiously process the instant Application so that TruConnect can quickly begin expanding the availability of affordable Lifeline-supported wireless services to qualifying low-income customers in Georgia.

TruConnect 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

[8] 47 U.S.C. § 214(e)(2).

[9] *See Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("*USF Order*").

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

IV. TRUCONNECT 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.[11] 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 forborne from the "own facilities" requirement. Applicants

[10] *See Lifeline and Link Up Reform Order*, ¶ 368.

[11] *See USF Order*, ¶ 145.

also must commit to advertise the availability and rates of such services.[12] As detailed below, TruConnect satisfies each of the above-listed requirements.

A. TruConnect 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 forborne from that requirement with respect to carriers such as TruConnect. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the "own-facilities" requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:[13]

(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*, TruConnect filed a Compliance Plan with the FCC, which the FCC approved on December 26, 2012,[14] a copy of which is attached hereto as Exhibit 2. TruConnect commits to providing Lifeline service in Georgia in accordance with its FCC-approved Compliance Plan, as amended, and in compliance

[12] *See* 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

[13] *See Lifeline and Link Up Reform Order*, ¶¶ 368, 373, and 379.

[14] *See Wireline Competition Bureau Approves the Compliance Plans of Airvoice Wireless, Amerimex Communications, Blue Jay Wireless, Millennium 2000, Nexus Communications, Platinumtel Communications, Sage Telecom, Telrite and Telscape Communications*, WC Docket No. 09-197, WC Docket No. 11-42, Public Notice, DA 12-2063 (Dec. 26, 2012). On April 10, 2023, TruConnect filed a letter with the FCC to advise that it had updated certain practices to reflect current Lifeline rules. A copy of the letter is included in Exhibit 2.

with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

B. TruConnect Is a Common Carrier

CMRS providers like TruConnect are treated as common carriers.[15]

C. TruConnect Will Provide All Supported Services

Through its Underlying Carriers, TruConnect 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. TruConnect provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from T-Mobile and Verizon.

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

Access to Emergency Services. TruConnect 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

[15] *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, 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 Personal Communications Services et al.,* 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).

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. TruConnect 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.[16] "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."[17] Nonetheless, TruConnect's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. TruConnect'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), TruConnect 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."[18] TruConnect provides BIAS to low-income consumers via resale of T-Mobile and Verizon's services.

[16] *See Lifeline and Link Up Reform Order*, ¶ 367.

[17] *See id.* ¶ 49.

[18] *See* 47 C.F.R. § 8.1(b).

D. TruConnect Requests Designation Throughout Its Service Area

TruConnect is not a rural telephone company as defined in Section 3(44) of the Act (47 U.S.C. § 153(44)). Accordingly, TruConnect is required to describe the geographic area(s) within which it requests designation as an ETC. TruConnect 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. TruConnect provides a list of wire centers in which T-Mobile has sufficient coverage[19] and a list of counties in which Verizon Wireless has sufficient coverage[20] in Exhibit 3. TruConnect understands that its service area overlaps with rural carriers in Georgia 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. TruConnect is not eligible for and does not seek Link-Up or high-cost support.

Therefore, designation of TruConnect 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

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[19] *See Application of T-Mobile South for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the Communications Act of 1934*, Order Granting in Part and Denying in Part ETC Status, Docket No. 32967 (March 21. 2012) (designating T-Mobile as an ETC in wire centers in which T-Mobile serves 40 percent of the population); *see also Application of IM Telecom, LLC d/b/a Infiniti Mobile for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, Order Amending ETC Designation, Docket No. 30193 (May 11, 2023) (adopting Staff recommendation to amend ETC designation to include wire centers of AT&T Mobility and T-Mobile as listed in attachments).

[20] *See Application of Sage Telecom Communications, LLC for Designation as an Eligible Telecommunications Carrier in the State of Georgia*, Order Amending ETC Designation, Docket No. 38390 (February 22, 2024) (amending ETC designation to include counties identified by Verizon as having met the 40 percent population coverage requirement established in Docket No. 32967).

services, and new technologies."[21] 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.[22] In light of this forbearance, the Commission has the authority to designate ETCs such as TruConnect in rural areas without concern for the service area conformance requirement.[23]

E. TruConnect Will Advertise the Availability of Supported Services

TruConnect 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). TruConnect will comply with the FCC's rules regarding information to be included in marketing materials, including rule section 54.405(c). Specifically, TruConnect'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 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) TruConnect is the provider of the services. Moreover, the Lifeline

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[21] *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 ¶ 7 (2000).

[22] *See 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. Apr. 15, 2013).

[23] *See* 47 C.F.R. § 54.207(c).

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, TruConnect 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. Sample advertisements that will be used in Georgia are attached hereto as Exhibit 4.

TruConnect 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. TruConnect 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 to inform customers of the availability of its Lifeline service. In addition, TruConnect 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. TruConnect 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. TRUCONNECT SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)

TruConnect 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

TruConnect will provide service in Georgia by reselling service which it obtains from its Underlying Carriers. Both the T-Mobile and Verizon networks are operational and largely built

out. Thus, TruConnect will be able to commence offering its Lifeline service to all locations served by T-Mobile and Verizon 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, TruConnect 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), TruConnect has the ability to remain functional in emergency situations. As discussed, TruConnect will utilize the extensive and well-established network and facilities of T-Mobile and Verizon to provide its Lifeline services. The Company understands that the networks of its Underlying Carriers have access to a reasonable amount of back-up power to ensure functionality without an external power source, can reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. Indeed, the Underlying Carriers have certified to the FCC that their networks function in emergency situations.[24] The Underlying Carriers provide the same functionality to TruConnect and its customers as they provide to themselves and their own customers.

[24] *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); *Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, Order, 27 FCC Rcd 9495, ¶ 20 (rel. Aug. 16, 2012).

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. TruConnect hereby commits to comply with the CTIA Consumer Code for Wireless Service.

D. TruConnect is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), TruConnect is financially and technically capable of providing Lifeline-supported services. The Company has been offering telecommunications service since 1998 and began providing non-Lifeline wireless service in October 2012, and Lifeline-supported wireless service in May 2013. TruConnect, in combination with its affiliate Sage d/b/a TruConnect, already successfully provides wireless services nationwide, including Lifeline services in thirty-nine (39) jurisdictions. TruConnect has not been subject to ETC revocation proceedings. The Company has operated as a telecommunications carrier for twenty-five years and has never had to file for bankruptcy protection, and is supported by the resources of its parent, TSC. TruConnect does not, and does not intend to, offer exclusively Lifeline-supported services and is therefore not exclusively dependent on USAC for its revenue. The result of TruConnect's efforts is that it is fully capable of honoring all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of TruConnect has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.[25] TruConnect will be providing resold wireless service,

[25] *See* Exhibit 5 for key management bios.

and therefore will also rely upon the managerial and technical expertise of its Underlying Carriers.

E. Terms and Conditions of Proposed Lifeline Offering

TruConnect can provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout Georgia. TruConnect intends to be a leader in the prepaid marketplace by offering consumers exceptional value, unlimited voice and competitive broadband usage. TruConnect 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. TruConnect'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 TruConnect 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 TruConnect will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 6 is a summary table of the Company's proposed Lifeline service offering, showing that Lifeline customers will receive unlimited voice minutes, unlimited text messages, and 4.5 gigabytes (GB) of data per month with full access to the T-Mobile and Verizon networks at a net cost of $0.00 after application of Lifeline support.[26] Lifeline customers that also elect to receive ACP benefits from TruConnect will receive unlimited talk, unlimited text, and unlimited data after application of Lifeline and ACP support at a net cost of

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

$0.00. Customers will be able to purchase additional data as needed. All plans will include nationwide domestic long-distance at no extra per-minute charge and free international calling to Canada, Mexico, China, Vietnam, and South Korea. TruConnect 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. TruConnect'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. TruConnect 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 (from the National Verifier's website) or request that a copy be mailed to them. TruConnect 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] TruConnect will comply with 47 C.F.R. § 54.410(b) through (g), to the extent such rules apply to the Company. The Company will notify the subscriber that they must use their service every thirty (30) days. TruConnect further confirms that it will not activate a Lifeline service unless or until it has received confirmation from the National Verifier that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and the consumer has 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. TruConnect will rely on the National Verifier to determine initial and ongoing eligibility of Georgia 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 TruConnect or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. TruConnect 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.

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

Consistent with federal regulations, to the extent the Company offers a Lifeline service that does not require it to assess and collect a monthly fee from its subscribers, the Company will not seek USF reimbursement for a subscriber until they have activated the service, by a means specified by the Company in its terms and conditions, 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), TruConnect 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.

H. TruConnect Will Comply with Annual Certification Requirements

TruConnect will rely on the National Verifier for annual recertification of Lifeline eligibility in accordance with Section 54.410 of the FCC's Rules.

I. TruConnect Will Comply With Reporting Requirements

TruConnect 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. TruConnect Will Comply With Regulations Imposed By The Commission

By this Application, TruConnect 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, TruConnect is prepared to answer questions or present additional testimony or other evidence about its services within the state. TruConnect commits that 100% of federal universal service funds will flow through directly to Lifeline customers.

VI. TRUCONNECT MEETS THE COMMISSION'S REQUIREMENTS FOR DESIGNATION AS AN ETC

An application for ETC designation in Georgia also must meet Georgia statutory and regulatory requirements.[28] These requirements include compliance with Georgia Compiled Rules and Regulations Rule 515-12-1-.35 and the Commission's orders and reporting requirements related to ETCs.

TruConnect will comply with the Commission's rules governing ETCs that offer Lifeline service and any applicable reporting requirements. Rule 515-12-1-.35 of the Georgia Administrative Code sets forth the minimum requirements for ETCs that seek Lifeline support. Rule 515-12-1-.35(1)-(9) provides the following:

> 1) An Eligible Telecommunications Carrier must meet the requirements set forth in 47 U.S.C. § 214(e)(1)(A) and (B) and all rules and regulations duly promulgated by the [FCC] set forth in 47 C.F.R. part 54, Subpart C (Carriers Eligible for Universal Service Support), Subpart D (Universal Service Support for High Cost Areas), or Subpart E (Universal Service Support for Low-Income Consumers), except to the extent the FCC has granted a waiver of its rules and regulations.
>
> 2) An Eligible Telecommunications Carrier shall satisfactorily resolve within a reasonable time period any and all complaints filed against it with the Commission's Consumer Affairs Unit.
>
> 3) An Eligible Telecommunications Carrier shall advertise the availability of Lifeline service on its internet website.
>
> 4) An Eligible Telecommunications Carrier shall not charge usage (i.e., decrement minutes) or charge fees of any kind for calls to customer service.

[28] *See* Ga. Code § 46-2-30 (2021).

5) An Eligible Telecommunications Carrier shall file the number of Lifeline subscribers that the carrier serves in the State of Georgia as of June 30th and December 31st of each year, broken down by eligibility criterion. The report shall be filed 15 days from the close of the period.

6) An Eligible Telecommunications Carrier that provides no-cost service after application of the Lifeline discount shall file with the Commission quarterly reports, due no later than 15 days from the close of each quarter, that report the number of customers who have been deactivated pursuant to 47 C.F.R. § 54.405(e)(3), the number of customers who did not pass annual verification, and the number of customers who were voluntarily deactivated.

7) Lifeline materials including advertisements, application forms, and verification forms must include the following language: "Unresolved complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at [(404) 656-4501 and toll free at (800) 282-5813]."

8) Any proposed increases in an Eligible Telecommunications Carrier's least cost service rate available to Lifeline customers, any increase in connection charges, or the addition of any proposed surcharges, other than those specifically provided for in State or Federal law, shall require 30 days written notice to the Commission.

9) An Eligible Telecommunications Carrier shall include its lowest cost service offering in all Lifeline advertisements.

TruConnect will comply with each of the requirements of Rule 515-12-1-.35 applicable to wireless ETC services. TruConnect will resolve, within a reasonable period of time, any and all complaints filed against it with the Commission's Consumer Affairs Unit. TruConnect also will advertise the availability of Lifeline service on its internet website. TruConnect offerings will include unlimited local and interstate calling; therefore, no fees will be charged for calls to customer service. TruConnect will offer Lifeline service as required by the FCC's and Commission's rules at all locations where it has been awarded support and will submit the required filings and reports. TruConnect will include the required language in its Lifeline materials and will comply with the Commission's rules, including providing written notice to

the Commission before increasing certain rates or charges. TruConnect will include its lowest cost service offering in all Lifeline advertisements.

VII. DESIGNATION OF TRUCONNECT 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.[29] Designation of TruConnect as an ETC in Georgia 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 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."[30] Given this context, designating TruConnect as an ETC

[29] *Telecommunications Act of 1996,* Pub. L. No. 104-104, 110 Stat. 56.

[30] *See Lifeline Modernization Order,* ¶ 2.

would significantly benefit low-income consumers eligible for Lifeline services in Georgia -- the intended beneficiaries of universal service.

A. Advantages of TruConnect's Service Offering

TruConnect 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 TruConnect's wireless service include larger calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile service, and a unlimited amount of voice and generous amount of 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 are an invaluable resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for "unbanked" consumers.

TruConnect's Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with unlimited 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 application of Lifeline support. TruConnect's Lifeline offering will be provided either over T-Mobile's 4G LTE network or the Verizon network. TruConnect'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 TruConnect's management team, the Company's proven technology-based business model, and TruConnect's solid history as a Lifeline provider, TruConnect is uniquely positioned to meet the needs of Lifeline customers. Utilizing the Company's innovative outreach and high integrity enrollment process, and TruConnect 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 TruConnect 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.[31] Increasing customer choice promotes promote 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 TruConnect as an ETC will help

[31] *See, e.g., Specialized Common Carrier Services,* 29 FCC 2d 870 (1971).

ensure that quality services are available at "just, reasonable, and affordable rates" as envisioned in the Act.[32] Introducing TruConnect into the market as an additional wireless ETC provider will afford low-income Georgia 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 the same whether the support is given through a company such as TruConnect 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, TruConnect 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 TruConnect's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. TruConnect'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.

[32] *See* 47 U.S.C. § 254(b)(1).

VIII. CONCLUSION

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

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

Respectfully submitted,



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February 28, 2024

* Admitted to the D.C. Bar under D.C. App. R. 46-A (Emergency Examination Waiver) and supervised by active D.C. Bar Members.

EXHIBIT 1

Certification of Nathan Johnson

DocuSign Envelope ID: 810E64BD-EC32-4732-A1B9-A1355204D5DD

CERTIFICATION

STATE OF CALIFORNIA)

)

COUNTY OF LOS ANGELES)

I, Nathan Johnson, the Co-Chief Executive Officer of TruConnect Communications, Inc. ("TruConnect") hereby state upon oath and affirmation of belief and personal knowledge that the matters, facts and statements set forth in the foregoing document are true to the best of my knowledge and belief; and that TruConnect meets all the statutory and regulatory requirements for designation as an Eligible Telecommunications Carrier.

Date: 12/20/2023

DocuSigned by:
3287E0CD9AF948E...

Nathan Johnson, Co-CEO
TruConnect Communications, Inc.

EXHIBIT 2

FCC-Approved Compliance Plan
and Revised Compliance Plan

PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 12-2063
Release Date: December 26, 2012

WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF AIRVOICE WIRELESS, AMERIMEX COMMUNICATIONS, BLUE JAY WIRELESS, MILLENNIUM 2000, NEXUS COMMUNICATIONS, PLATINUMTEL COMMUNICATIONS, SAGE TELECOM, TELRITE AND TELSCAPE COMMUNICATIONS

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves the compliance plans of nine carriers: AirVoice Wireless, LLC (AirVoice); AmeriMex Communications Corp. (AmeriMex); Blue Jay Wireless, LLC (Blue Jay); Millennium 2000, Inc. (Millennium 2000); Nexus Communications, Inc. (Nexus); PlatinumTel Communications, LLC (PlatinumTel); Sage Telecom, Inc. (Sage); Telrite Corporation (Telrite); and Telscape Communications, Inc. d/b/a Telscape Wireless (Telscape). The compliance plans were filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.[1]

The Act provides that in order to be designated as an eligible telecommunications carrier (ETC) for the purpose of universal service support, a carrier must "offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier's services . . . ."[2] The Commission amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.[3] As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by providing operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.[4] In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement,

[1] *See Lifeline and Link Up Reform and Modernization et al*, WC Docket No.11-42 *et al.,* Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6816-17, paras. 379-380 (2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

[2] 47 U.S.C. § 214(e)(1)(A).

[3] *See Lifeline Reform Order*, 27 FCC Rcd at 6678, para. 47; *see also* 47 C.F.R. § 54.101(a).

[4] *See Lifeline Reform Order*, 27 FCC Rcd at 6812, para. 366, App. A; *Connect America Fund et al*, WC Docket 10-90, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration)*. Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. *See, e.g.,* Blanket Forbearance Compliance Plan, WC Docket Nos. 09-197 and 11-42, Q Link Wireless, LLC's Third Amended Compliance Plan at 4 n. 2 (filed July 30, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under sections 54.101 and 54.401 of the Commission's rules. *See* 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.[5] Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.[6]

The Bureau has reviewed the nine plans listed in the Appendix for compliance with the conditions of the *Lifeline Reform Order* and now approves those nine compliance plans.[7]

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpiweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Michelle Schaefer, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

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[5] *See Lifeline Reform Order*, 27 FCC Rcd at 6813-6817, paras. 368-381.

[6] *See id.*, 27 FCC Rcd at 6814, 6819, paras. 373, 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

[7] The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. *See Lifeline Reform Order*, 27 FCC Rcd at 6679-80, 6818-19, paras. 50, 387.

APPENDIX

Petitioner	Compliance Plans As Captioned by Petitioner	Date of Filing	Docket Numbers
AirVoice Wireless, LLC	AirVoice Wireless, LLC's Amended Compliance Plan	December 7, 2012	09-197; 11-42
AmeriMex Communications Corp.	AmeriMex Communications Corp. Revised Compliance Plan	December 6, 2012	09-197; 11-42
Blue Jay Wireless, LLC	Blue Jay Wireless, LLC Compliance Plan	December 19, 2012	09-197; 11-42
Millennium 2000 Inc.	Amended Compliance Plan of Millennium 2000 Inc.	December 18, 2012	09-197; 11-42
Nexus Communications, Inc.	Third Amended Compliance Plan of Nexus Communications, Inc.	December 6, 2012	09-197; 11-42
PlatinumTel Communications, LLC	PlatinumTel Communications LLC's Revised Compliance Plan	December 19, 2012	09-197; 11-42
Sage Telecom, Inc.	Revised Compliance Plan of Sage Telecom, Inc.	December 19, 2012	09-197; 11-42
Telrite Corporation	Telrite Corporation Compliance Plan	December 19, 2012	09-197; 11-42
Telscape Communications Inc. d/b/a Telscape Wireless	Revised Compliance Plan of Telscape Communications, Inc.	December 19, 2012	09-197; 11-42

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Federal-State Joint Board on Universal Service	)	WC Docket No. 09-197
Lifeline and Link Up Reform Modernization	)	WC Docket No. 11-42

REVISED COMPLIANCE PLAN OF TELSCAPE COMMUNICATIONS, INC.

Telscape Communications, Inc. dba Telscape Wireless ("Telscape"), by its attorneys, respectfully submits this Revised Compliance Plan ("Plan"). Telscape's original Compliance Plan was filed July 2, 2012, and an initial revised version of the plan was filed September 24, 2012.

In the *Lifeline Reform Order,*[1] the Commission adopted rules and procedures through which it instituted "blanket forbearance" from the applications of the facilities requirement to all telecommunications carriers seeking a limited ETC designation to provide wireless Lifeline services. In order to qualify for this blanket forbearance, the Commission requires carriers to comply with certain 911 requirements and file and receive approval of a compliance plan providing specific information about its service offerings and procedures to safeguard against waste, fraud and abuse.

[1] *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 11-12, ¶ 172 (rel. Feb. 6, 2012) ("*Lifeline Reform Order*").

Therefore, Telscape respectfully submits this Plan in accordance with the Lifeline Reform Order and instructions set forth in the Wireline Competition Bureau *Public Notice* issued on February 29, 2012.[2] Telscape seeks approval of this compliance plan only for the provision of Lifeline support to provide wireless services nationwide, as the company offers wireline service as a facilities-based carrier under the approval of state commissions. This Plan sets forth Telscape's service offerings and the procedures and measures it will use to safeguard against waste, fraud and abuse. In support of this request, Telscape provides the following information:

(1) Information about the carrier and the Lifeline plans it intends to offer:

(a) names and identifiers used by the carrier, its holding company, operating company and all affiliates;

Telscape is a competitive local exchange carrier ("CLEC") based in Los Angeles, California. The company has provided traditional wireline service since 1996 and wireless service in California as a non-ETC carrier since 2007. Telescape is also a provider of broadband Internet services. Telscape's service primarily focuses on offering specialized services to meet the needs of the Spanish-speaking market, as well as low-income consumers. Telscape is also an ETC in California, having provided wireline service to low income consumers under California's state low income support program. Telscape has authority to operate as a wireless ETC from the California PUC as well.

Telscape is a Delaware corporation with offices located at 355 South Grand Avenue, Ste. 3100, Los Angeles, CA 90071. Telscape has authority to provide local exchange and interstate

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[2] Public Notice, Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, DA 12-314, (Rel. Feb. 29. 2012).

telecommunications services in California and seven other states.[3] On October 6, 2011, the California Public Utilities Commission designated Telscape as an ETC for both wireless and wireline services in the state of California for purposes of participating in the Lifeline program. Telscape provides its wireless service under the name "Telscape Wireless" and does not offer wireless services under any other brand or company names.

Telscape is wholly-owned by TSC Acquisition Corporation ("TSC"). On July 2, 2012, TSC completed its acquisition of Sage Telecom, Inc. ("Sage"), a CLEC that provides service in numerous states including Arkansas, California, Connecticut, Illinois, Kansas, Michigan, Missouri, Ohio, Oklahoma, Nevada, Texas and Wisconsin. Sage's service to customers in these 12 states complements, in part, Telscape's focus on the southwestern United States. As a result of the acquisition, Telscape, through its common ownership with Sage, has gained collective access to a broader market and combined subscriber growth. The majority of Sage's current customers are non-Lifeline customer, but Sage currently has wireline Lifeline customers in five states for which it is reimbursed through both state and federal programs, depending upon the state and the customer.[4] In addition, through this combined ownership, Telscape has also gained access to the expertise of Sage's managers and operations.[5]

Telscape is also affiliated with TruConnect Mobile, LLC ("TruConnect"), through partial common ownership. TruConnect is 40% owned by TSC, Telscape's parent company as described above. TruConnect provides mobile broadband data services and does not provide any services supported by the low income program.

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[3] These states are Arizona, Florida, Illinois, Nevada, New York, New Jersey and Texas.

[4] In California, Sage receives support only from the CPUC's Low Income Programs. Sage also receives support from state programs in Kansas, Texas and Wisconsin.. Sage receives support on a federal level for service in these three states and Oklahoma.

[5] Additional information concerning TSC ownership structure and qualifications is set forth in its application to acquire Sage Telecom, Inc. filed in WC Docket No. 12-119.

(b) detailed information demonstrating the carrier is financially and technically capable of providing the supported Lifeline services in compliance with the Commission's rules;

As a long-time provider of both wireline and wireless services in California, Telscape has a proven record of technical and financial qualifications. For example, Telscape owns and operates its own switching facilities back-office and operations support systems ("OSS"), which allows it to operate at lower costs and pass those savings on to its subscribers. Throughout the years, Telscape has invested substantial revenue to develop, integrate and maintain its systems.

As a carrier who has provided service in California for over 15 years, Telscape possesses the financially viability, as well as the expertise to continue to provide affordable and quality service to customers and has the proven experience to maintain its compliance with all applicable federal and state regulatory guidelines. Telscape derives the majority of its revenue from the telecommunications services it provides to its customers. Telscape does not and will not rely exclusively on the Universal Service Fund ("USF") disbursements to operate, but rather relies on revenues it receives from providing non-Lifeline wireline and wireless service, the payment for service by Lifeline customers,[6] as well as high-speed Internet services. In addition, Telscape is a fully audited corporation and has not been subject to any type of enforcement action or ETC revocation proceeding by the FCC or California.

Telscape is already working with Sprint Spectrum and resells Sprint's wireless services to its non-Lifeline customers in California. As a Lifeline service provider, Telscape will continue to work with Sprint, who provides the necessary network infrastructure and wireless facilities necessary for the operation of Telscape's services as a Mobile Virtual Network Operator ("MVNO"). As the Commission is aware, Sprint is a large, nationwide carrier who provides

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[6] All of Telscape's Lifeline wireline customers currently pay a monthly fee for the discounted service.

similar service to other wireless Lifeline providers operating as MVNOs. Telscape's agreement and partnership with Sprint further demonstrates its financial and technical capability to provide these services.

(c) detailed information, including geographic locations, of the carrier's current service offerings if the carrier currently offers service;

As detailed in response to Question 1(a) above, Telscape currently provides local and interstate wireline and wireless services in California as well as broadband Internet services in that state.

(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided and additional charges, if any, for toll calls;

At this time, Telscape plans to offer the following Lifeline plans and services to customers in California and eventually similar plans nationwide. The California service plans are listed below and were approved by the CPUC as part of the ETC application process. The basic plan provides 300 minutes a month to Lifeline customers for $2.50 a month. A similar plan is marketed to non-lifeline customers at $15.00, but would be discounted to $2.50 for Lifeline eligible customers (after reimbursement). All plans require a monthly payment by the customer.

Plan 1 – 300 Minutes $2.50 a month

Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
Voicemail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	$1.50 per call

Plan 2 – 1,100 Minutes $20.00 a month

Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
Voicemail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	$1.50 per call

Additional Minutes. For both Plans above, if the subscriber wishes to purchase additional minutes, they may do so at any time during a given month and such minutes will be available at $0.03 per minute, with a minimum purchase of 200 minutes. For example, 200 additional minutes will cost $6.00 and 500 additional minutes will cost $15.00.

Text Messages. Plans above include text messaging and text messages will be assessed at a rate of 1 minute per text message sent and 1 minute per text message received. In other words, each text message is the equivalent of one minute of calling.

Other. Telscape's plans will include a free handset and the customer calling features listed above. Customers are not limited by a local calling area and may use the minutes for any type of call other than international calls. Calls to 911 are free and customers may call 911 regardless of the availability of minutes. There is a $30.00 activation fee for Telscape wireless service.

Outside of California, Telscape will offer plans similar to the following, subject to state specific requirements or requests from state PUCs. As with California, these plans are offered to both Lifeline and non-Lifeline subscribers, with a discount applied to the Lifeline customer. Services will be offered on a prepaid basis, and potentially also on a postpaid basis, as is done in California. All services will normally have an activation fee and will likely require a monthly payment from the customer. The prices listed below show the basic, non-Lifeline price and the price to the consumer with the $9.25 Lifeline credit applied. All plans will likely require a monthly payment by the customer. Telscape commits to providing a minimum of 250 minutes per month for the $9.25 subsidy.

Telscape is still determining the exact plans it will offer (reiterating the condition that plans will provide a minimum of 250 minutes for the $9.25 subsidy), but a sample plan would be as follows:

ValuMobile Plus Price: $24.25 per month/Lifeline Price: $15.00

Features	**Cost**
500 minutes Voice/Text	Included
Call Waiting	Included
3 Way Calling	Included
Caller ID	Included
VoiceMail	Included
911	Free
611 (Customer Service)	Free
Directory Assistance	$1.50

Activation Fee: $25.00

Additional Minutes: For all service plans the customer can purchase additional voice, data, MMS, text minutes for $0.05 per minute with a minimum purchase of $5.00. For example, 100 additional minutes will cost $5.00. The customer will have the ability to purchase 100 minutes ($5.00); 200 minutes ($10.00); 300 minutes ($15.00) and 500 minutes ($25.00). For Unlimited service plans the customer will not need additional voice or text but will need to purchase additional minutes for data and MMS. MMS is priced at $0.15 per minute and Data is $0.05 per MB.

Text Messages: The service plans include text messaging; text messaging rates are assessed at 1 minute per text message sent and 1 minute per text message received.

Other: Plans do not permit rollover minutes. Top Ups are available for a 30 day period as long as the customer renews the service at the normal plan rate. Plans do not allow roaming. The $25.00 Activation Fee includes selection of a basic handset which is activated and provided ready for use. Customers are allowed to call internationally but will be assessed the international rates. International text rates are $0.20 per minute for messages sent or received. Special Promotional offer: 10 MB data FREE for 3 months with the selection of a data capable phone. .

(e) all other certifications required under newly amended section 54.202 of the Commission's rules.

Section 54.202 requires ETCs to (1) certify that it will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the

network unless the ETC is receiving only Lifeline support; (3) demonstrate that it will continue to function in emergency situations including reasonable back-up backup power and emergency traffic management; (4) demonstrate that the carrier will comply with applicable consumer protection and service quality standards; (5) demonstrate that it is financially and technical qualified to provide Lifeline services that comply with the applicable rules; and (6) provide information concerning the terms and conditions of the service plans offered to Lifeline customers.

In response to item (1), Telscape certifies that it will comply with applicable service requirements and regulations for Lifeline support.

In response to item (2), Telscape is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers.

In response to item (3), as a CLEC provider in California for over 15 years, Telscape has significant experience with emergency preparedness. Telscape has detailed Emergency Action and Disaster Recovery Plans in place to respond to emergencies.. In addition, Telscape's agreement with Sprint provides for the continuation of services during emergencies and sets forth obligations for the service to remain functioning during disasters and similar emergency situations. In addition, as a nationwide carrier and provider of wireless service, Sprint also remains subject to the Commission's authority and must, and does, comply with federal outage reporting requirements.

In response to item (4), Telscape certifies that it will comply with the applicable consumer protection and service quality standards. As a CLEC operating in California, Telscape is already subject to that state's consumer protection and service quality requirements. Telscape's Lifeline customers will also receive the same quality service and protections.

Telscape's response to items (5) and (6) are provided above and in the provided exhibits

(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all consumer eligibility, consumer enrollment and re-certification procedures as required by Section VI and Appendix C of the Lifeline Reform Order, and a copy of the carrier's certification form;

Under the *Lifeline Reform Order*, ETCs must comply with eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, Telscape must also comply with all certification and verification requirements for Lifeline eligibility established by states where Telscape is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certifications and annual certifications, Telscape certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification.

In states where there is a third party entity acting as the Lifeline administrator (also referred to as the "Certifying Agent" in California) who is responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the appropriate approval of a potential

subscriber's eligibility for Lifeline, Telscape will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator.

Based on Telscape's history of providing Lifeline and non-Lifeline customers in wireline products, Telscape's primary source of signing up Lifeline customers will be via telephone, although some customers (entirely in California at this point) will be signed up in person at the retail locations staffed by Telscape employees. Visitors to Telscape's website will be given information about the program but are required to contact Telscape directly via telephone to complete the sign-up process. These callers speak to Telscape employees who are specially trained on the Lifeline programs. Telscape's customer services representatives will review income- and program-based requirements with applicants via telephone contact or point of sale contact at one of Telscape's retail locations.[7] During the initial sign up for service, Telscape will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.

Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. If, after the verification process is completed, the customer is deemed eligible, they are credited with the

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[7] For example, Telscape has retail store locations called "Telemercados" throughout its service areas in the Los Angeles and San Diego, California areas to provide it subscribers the opportunity to walk in and deal with a Telscape representative directly, as well as over 380 authorized payment locations throughout all of Southern California.

Lifeline discount back to the date service was initiated. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed.

The Verification process varies by state, in states with a Lifeline administrator, if a new applicant indicates that he or she is eligible for Lifeline service, Telscape will provide the applicant's relevant information to the administrator in conformance with any state or Lifeline administrator specific rules. The Lifeline administrator will provide the requisite forms and will be responsible for processing those forms when returned and ensuring the documentation is satisfactory as set forth in state regulations. Telscape will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility from the Lifeline administrator.

In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, Telscape will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Sections 54.409(a)(1) or (a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, Telscape will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. Telscape will inform the applicant that any information provided

will be submitted to USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support.

After confirming initial eligibility either in person or over the phone, Telscape will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation. Specifically, Telscape's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's full name; (ii) the subscriber's full residential street address (P.O. Boxes will not be acceptable); (iii) whether the residential address is permanent or temporary; (iv) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (vii) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, Telscape will require all Lifeline applicants to certify, under penalty of perjury, that:

- the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;
- the applicant has provided documentation to Telscape that correctly and accurately confirms the subscriber's household income or participation in the above-listed

program(s);

- the applicant will notify its carrier within thirty (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 subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify Telscape;
- if the applicant moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within thirty (30) days;
- if the applicant provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every ninety (90) days;
- the applicant acknowledges that the subscriber will 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 his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- the applicant'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;
- the information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance if punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per-household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- the applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- the applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not receive more than one Lifeline benefit and consenting to the inclusion of that information into a Lifeline database.

A sample Telscape application is attached hereto as Exhibit A.

This application is mailed by Telscape to the customer for completion and is returned to Telscape for review and certification. All applications are reviewed by Telscape employees or

by employees of their affiliate Sage. Should Telscape engage sales agents to assist in signing up customers, those applications will also be reviewed by employees to ensure the applicant's eligibility.[8] This review includes a review to determine eligibility as well as a duplicate review process described below. Telscape will make itself available as a direct point of contact with all Lifeline applicants, either in person through its employees, or by telephone. In addition, all Telscape employees who have contact with potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If Telscape cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, Telscape personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then Telscape will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income-eligibility or program-based eligibility, Telscape will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility.[9] In addition, if the subscriber provides Telscape with a temporary address, it will verify with the subscriber every 90 days that this address remains valid. If the subscriber fails to respond to the Telscape within 30 days, the subscriber will be de-enrolled from the Lifeline program.

Procedures for Annual Re-Certification. Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is

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[8] In states with a Lifeline Administrator, this process would be handled pursuant to the procedures of the Administrator.

[9] 47 C.F.R. §§ 54.410(b)(1)(ii)-(iii) and 54.410(c)(1)(ii)-(iii).

responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certifications, Telscape will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to Telscape that a current subscriber did not re-certify, then Telscape will comply with the de-enrollment requirements required by the FCC's rules. Telscape will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures.

In states where there is not a Lifeline administrator, Telscape will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.410(f)(2) and (f)(5) and 54.405(e)(4). Telscape may complete the re-certification process on a rolling basis throughout the year. If Telscape cannot determine on-going eligibility by accessing a qualifying database, Telscape will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone, by text message, by email or otherwise through the Internet.[10] Alternatively, beginning in 2013, Telscape may elect to have the USAC administer the annual self-certification process.[11]

As part of the re-certification process, Telscape will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact Telscape for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, Telscape will

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10 *Lifeline Reform Order*, ¶ 130.

11 *Id.*, ¶ 133.

send a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.[12]

(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access;

The Commission conditioned its grant of forbearance on an ETC (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.[13] Telscape's wireless service currently complies with these requirements and will continue to comply with these conditions.

Specifically, Telscape provides its wireless subscribers with 911/E911 access at the time their service is initiated, regardless of activation status and availability of minutes and provides its subscribers with E911-compliant handsets. It is the company's practice to provide access to 911/E911 to the extent these services are available from the underlying carrier, Sprint. Telscape also enables 911 emergency calling from all properly activated handsets regardless of whether the account associated with the handset is active, suspended to terminated. Telscape will transmit all 911 calls initiated from any of its handsets even if the associated account has no remaining minutes.

In addition, all phones provided by Telscape are 911/E911 compliant. Telscape uses phones from Sprint that, based on representations made to Telscape by Sprint, have been through the applicable certification process in the company's labs. In the event that a customer does not have an E911-complaint handset, Telscape will replace it with a compliant handset at no charge.

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12 47 C.F.R. § 54.405(e)(4).

13 *Lifeline Reform Order*, ¶ 373.

All new customers who qualify for Lifeline services with Telscape will receive a 911/E911-compliant handset free of charge.

(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;

Telscape has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline to its customers. Given the make-up of its customer base, primarily limited English speaking consumers, some of whom are of lower income, Telscape strives to use language that is easily understandable so as to avoid customer confusion. With respect to its wireless services, Telscape will emphasize in clear, easily understood language: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. Telscape will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Telscape has and will continue to clearly disclose its name (Telscape or Telscape Wireless) on all marketing materials. A sample advertisement that was approved for use in California by the California PUC is attached hereto as Exhibit B. Marketing outside of California will contain similar disclosures.

(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.

Telscape fully understand and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program. This is part of the reason that Telscape has

focused on providing excellent service for low-income customers, many of whom speak only Spanish. Moreover, Telscape has taken a focused approach and offering service initially only in California, as compared to launching services into several states or on a nationwide basis. This approach has allowed Telscape to refine its business practices and to implement policies consistent with the Commission's goal of minimizing waste, fraud and abuse before launching its service nationwide at some time in the future.

Prevention of Duplicates In Telscape's Subscriber Base. At time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits the Telscape subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, Telscape can check it in available databases or provide it to the Lifeline administrator, where applicable, to be checked against addresses for all Lifeline customer addresses for the entire state. For example, if an existing Lifeline subscriber, regardless of the carrier providing service, is receiving service at the same address, Telscape understands that the California Lifeline administrator will provide Telscape with a denial and that Lifeline applicant will be denied. Telscape further understands, for example purposes, that the California Lifeline administrator also has a process to check its database for the same subscriber name, date of birth and the last four digits of the person's social security number.

In addition, while it is anticipated that Telscape and its affiliate, Sage will only operate in different states, to the extent that they have Lifeline customers in the same state, customers can be checked against each company's records to further avoid duplication.

Activation and Non-Usage Policy. In California, Telscape does not consider a wireless subscriber activated until the customer has chosen a *non-Lifeline* service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this "prequalification guideline" prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer's eligibility has been confirmed and approved by the Lifeline administrator. As such, Telscape will not seek reimbursement for any wireless subscriber until the subscriber activates service and is approved by the Lifeline administrator or by Telscape, in states without a third party Lifeline administrator. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive their handset and service until they have an order processed and the activation fee is paid, customers receive activated handsets. Thus, there is no possibility of Telscape receiving reimbursement for a customer who does not have an active handset. After the order is processed, Telscape personnel activate, configure and test the handsets before they are sent to the consumer. Thus all customers receive an activated handset.

As required by the *Lifeline Reform Order*, Telscape has implemented a non-usage policy under which it will de-enroll Lifeline customers that have not used the Telscape's Lifeline service for 60 consecutive days. When consumers sign-up for Telscape's service, Telscape will inform them about the usage requirement. If a Telscape Lifeline customer's account does not reflect any usage during any consecutive 60-day period, Telscape will deactivate the customer's Lifeline service. Accounts will be deemed active if the Lifeline subscriber: (a) completes an outbound call; (b) purchases minutes or an additional month of service to add to the subscriber's

Lifeline service plan; (c) answers an incoming call from a party other than Telscape, its agent or representative; or (d) responds to a direct contact from Telscape and confirms that he or she wants to continue receiving the Lifeline service.[14]

For Lifeline subscribers failing to use their Lifeline service for a 60-day consecutive period as described above, Telscape will provide a clear, easily understood notice that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage. Telscape will not terminate service to Lifeline subscribers that use their Lifeline service within 30 days of Telscape providing said notice.[15]

Cooperate with Federal and State Regulators and Lifeline Administrators. Telscape will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. Telscape will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a Telscape Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability Database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service; and
- Comply with federal and state audit requirements.

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14 See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

15 47 C.F.R. § 54.405(e)(3).

CONCLUSION

Telscape respectfully submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*. Accordingly, Telscape respectfully requests approval of this Compliance Plan so that Telscape can provide essential Lifeline wireless service to eligible low-income customers nationwide.

Respectfully submitted,

/s/ electronically signed

Douglas D. Orvis II
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2020 K Street, N.W.
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Date: December 19, 2012

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April 10, 2023

Via ECFS

Jodie Griffin, Division Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: TruConnect Communications, Inc. Lifeline Compliance Plan; Federal-State Joint Board on Universal Service, *et al*., WC Docket Nos. 09-197, 11-42

Dear Ms. Griffin:

On December 26, 2012, Telscape Communications, Inc. (Telscape) received approval from the Wireline Competition Bureau (Bureau) of its Compliance Plan for its wireless Lifeline services.[1] The Company recently became aware that its approved Compliance Plan did not reflect its current name TruConnect Communications, Inc. (TruConnect or the Company). In addition, TruConnect has changed certain of its practices and procedures so that it does not needlessly duplicate tasks now handled by the National Verifier, National Lifeline Accountability Database (NLAD) or state administrators, and to reflect current Lifeline rules. As a courtesy, the Company hereby notifies the Bureau of the following changes.

First, Telscape advises the Bureau that it changed its name to TruConnect through an amendment to its Certificate of Incorporation. On September 28, 2015, the Secretary of State of the State of Delaware recognized the amended Certificate of Incorporation and the name change.

[1] *See generally Wireline Competition Bureau Approves the Compliance Plans of AirVoice Wireless, AmeriMex Communications, Blue Jay Wireless, Millennium 2000, Nexus Communications, PlatinumTel Communications, Sage Telecom, Telrite and Telscape Communications*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-2063 (rel. Dec. 26, 2012).

Since the Company formally changed its name in 2015, the Company's filings with the Commission have indicated that it does business as TruConnect. However, by this letter, the Company clarifies that its official corporate name for all purposes, including its provision of Lifelines services, is TruConnect Communications, Inc. The Company requests that the Bureau update its name in all relevant records.

Second, the Company notifies the Bureau that it has changed certain of its practices and procedures so that it does not needlessly duplicate tasks now handled by the National Verifier, NLAD or state administrators, and to reflect current Lifeline rules. Because performing a practice that is duplicative of those functions now performed by Universal Service Administrative Company (USAC) and its National Verifier and NLAD database, or state administrators, is not necessary to achieve compliance, the Company does not view any of these changes as being "material" changes warranting filing and approval of a revised compliance plan.[2] Processes must evolve to keep pace with changing rules and, when appropriate, to remove unnecessary burdens from service providers and Lifeline applicants and subscribers.

The Company uses this opportunity to notify the Bureau of changes to its processes so that compliance functions that were once done by TruConnect, but no longer are necessary, are no longer part of any perceived compliance plan obligations. The Company also advises that its processes have been updated to reflect the current regulatory landscape.

Specifically, the following process changes have been made to ensure the Company's continued compliance with the Commission's Lifeline rules:

(a) The Company[3] no longer undertakes functions that are performed or are rendered unnecessary by the National Verifier, NLAD or state administrators. Those functions include dipping of state databases and collection and review of proof of eligibility for purposes of (1) determining whether an applicant is currently receiving Lifeline benefits from another Lifeline service provider; (2) initially certifying Lifeline applicants' eligibility; or (3) annually recertifying Lifeline subscribers' continued eligibility.

(b) The Company does not make any determinations regarding whether an applicant meets income-based or program-based eligibility criteria, nor does it make any determinations regarding whether a Lifeline subscriber has completed the annual re-certification of eligibility.

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[2] *See Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 14-1052 (rel. July 24, 2014).

[3] Reference to the Company encompasses employees, customer service representatives, and agents.

(c) To the extent that the Company offers a Lifeline service that does not require it to assess and collect a monthly fee from its subscribers, the Company will not seek Lifeline support for a subscriber until the subscriber activates the service by a means specified by the Company in its terms and conditions.[4]

(d) The Company conducts the enrollment and de-enrollment process consistent with the requirements of NLAD.[5] To the extent that the Company provides Lifeline service in California, an NLAD opt-out state, it conducts the enrollment and de-enrollment process consistent with the requirements of the California Third Party Administrator's requirements.

(e) The Company provides de-enrollment notices to subscribers after 30 days of non-usage indicating that failure to use the service within the 15-day notice period will result in service termination for non-usage.[6]

(f) The Company has updated its Lifeline service offerings and marketing materials to reflect current minimum service standards and market realities.[7]

(g) The Company has replaced its application and certification form and its income eligibility worksheet with the universal forms as required by the Commission.[8]

(h) The Company uses the Lifeline Claims System in the NLAD for reimbursement.[9]

(i) The Company's underlying carrier has shifted from Sprint to T-Mobile, because of a merger between those two carriers. The Company's wireless coverage continues to

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[4] *See* 47 CFR § 54.407(c)(1). The Company no longer charges an activation fee to Lifeline subscribers in all states where it offers Lifeline service, except for California. In California, a one-time activation fee of $39 is charged to all new or transferred accounts. If a California LifeLine household is not eligible to receive the $39 activation fee from the California Lifeline Fund, TruConnect will use its own funds to credit the activation fee.

[5] *See* 47 CFR § 54.404.

[6] *See* 47 CFR § 54.405(e)(3).

[7] *See* 47 CFR § 54.408. The Company's current Lifeline service offerings are available at https://www.truconnect.com/lifeline.

[8] 47 CFR § 54.410(d); *Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, DA 18-161 (rel. Feb. 20, 2018).

[9] *See* USAC, *Lifeline Claims System (LCS)*, https://www.usac.org/lifeline/lifeline-claims-system-lcs/ (last visited June 8, 2022).

include 911/E911 access and 911/E911 compliant handsets compatible with its underlying carrier's network.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please feel free to contact me if you have any questions.

Respectfully submitted,



Joshua Guyan
John J. Heitmann
Debra McGuire Mercer

Counsel to TruConnect Communications, Inc.

cc: Nicholas Page

EXHIBIT 3

Coverage Area

ATTACHMENT 2 (T-Mobile)

WIRE CENTERS

CLLI	COMPANY NAME
ALMAGAXA	ALMA TELEPHONE CO., INC.
NCHLGAXA	ALMA TELEPHONE CO., INC.
PASNGAXA	ALMA TELEPHONE CO., INC.
ACWOGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
AGSTGAAU	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
AGSTGAFL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
AGSTGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
AGSTGATH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
AIVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ALBYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ALPRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
AMRCGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
APNGGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ASTLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATHNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAAD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGABH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGABU	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGACD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGACS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAEL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAEP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAFP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAGR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAHR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAIC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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ATLNGAWD	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ATLNGAWE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BCHNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BCTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BGRTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BLCSGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BRMNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BRWKGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BUFRGABH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
BXLYGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CCHRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CDTWGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CHMBGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CLHNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CLMBGABV	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CLMBGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CLMBGAMW	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI

CLMTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CMLLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CMNGGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CNYRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CORDGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CRTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CRVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CSSTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CVTNGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
CXTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
DBLNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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ESMNGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
FLBRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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FTVYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
FYVLGASG	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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GSVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
GTVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
HGVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
HMPNGAJW	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
HMTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
HPHZGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
HRLMGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
JCSNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
JESPGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
JHCRGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
JNBOGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
KGTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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LKPKGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LLBNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LRVLGAOS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LSBGGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LSVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LTHNGAJS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LULAGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
LYNSGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MACNGAGP	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MACNGAMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MACNGAVN	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MCDNGAGS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MDSNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MLLNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MRRWGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI

MRTTGAEA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
MRTTGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
NRCRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
NWNNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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PTCYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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RCKMGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
RCLDGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
ROMEGATL	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
RSWLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
RTLGGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
RVDLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SCCRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SENOGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SMVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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SMYRGAPF	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SNLVGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
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SPRKGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SSISGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
STBRGANH	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SVNHGABS	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SVNHGADE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SVNHGAGC	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SVNHGASI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SVNHGAWB	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SVNHGAWI	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SWBOGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
SYLVGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
TBISGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
TFTNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
THSNGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
THVLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
TLLPGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
TMPLGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
TUKRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
VDALGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
VLDSGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
VLRCGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
WDLYGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
WDSTGACR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
WRNSGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
WRRBGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
WTVLGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
WYBOGAES	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

WYCRGAMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
BNTNTNMT	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
CHTGTNBR	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
CHTGTNRO	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
CHTGTNSE	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
EUFLALMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
PHCYALMA	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TI
HOBKGAXA	BRANTLEY TELEPHONE CO., INC.
HRTSGAXA	BRANTLEY TELEPHONE CO., INC.
NHNTGAXA	BRANTLEY TELEPHONE CO., INC.
WYVLGAXA	BRANTLEY TELEPHONE CO., INC.
ARSNGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., INC.
BRLTGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., INC.
CLTOGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., INC.
NVLSGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., INC.
PRTLGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., INC.
STSNGAXA	BULLOCH COUNTY RURAL TELEPHONE COOP., INC.
STMYGAXA	CAMDEN TELEPHONE & TELEGRAPH CO., INC.
HNVLGAXA	COASTAL UTILITIES, INC.
KLLRGAXA	COASTAL UTILITIES, INC.
MDWYGAXA	COASTAL UTILITIES, INC.
RMHLGAXA	COASTAL UTILITIES, INC.
ELJYGAXA	ELLIJAY TELEPHONE CO.
RGSTGAXA	FRONTIER COMMUNICATIONS OF GEORGIA, LLC
STBOGAXA	FRONTIER COMMUNICATIONS OF GEORGIA, LLC
STBOGAXB	FRONTIER COMMUNICATIONS OF GEORGIA, LLC
HWVLGAXA	HAWKINSVILLE TELEPHONE COMPANY
WSPNGAXA	INTERSTATE TELEPHONE CO.
ELBLGAXA	PEMBROKE TELEPHONE CO., INC.
PMBRGAXA	PEMBROKE TELEPHONE CO., INC.
DOVRGAXA	PLANTERS RURAL TELEPHONE COOPERATIVE, INC.
GYTNGAXA	PLANTERS RURAL TELEPHONE COOPERATIVE, INC.
HLTNGAXA	PLANTERS RURAL TELEPHONE COOPERATIVE, INC.
NWNTGAXA	PLANTERS RURAL TELEPHONE COOPERATIVE, INC.
STGYGAXA	PLANTERS RURAL TELEPHONE COOPERATIVE, INC.
RNGLGAXB	RINGGOLD TELEPHONE CO.
RSFWGAXA	TRENTON TELEPHONE CO.
TRENGAXA	TRENTON TELEPHONE CO.
WBRWGAXA	TRENTON TELEPHONE CO.

5055 North Point Parkway
Alpharetta, GA 30022

Dulaney L. O'Roark III
Associate General Counsel
404-291-6252
de.oroark@verizon.com

January 23, 2024

VIA ALTERNATIVE EFILE

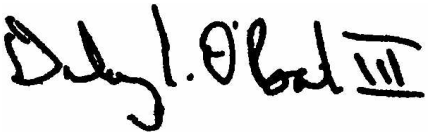
Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-9052

Re: Docket No. 36946

Dear Mr. McAlister:

Staff has requested that Cellco Partnership and its commercial mobile radio service provider subsidiaries operating in the state of Georgia d/b/a Verizon Wireless (Verizon Wireless) provide a list of the counties in Georgia where it meets the 40% population threshold established by the Commission in Docket No. 32967. Verizon Wireless meets the 40% threshold in each of the counties listed in Exhibit A.

Respectfully submitted,



Dulaney L. O'Roark III

Enclosure

EXHIBIT A

GEORGIA COUNTIES WHERE VERIZON WIRELESS COVERS AT LEAST 40% OF THE POPULATION

Appling
Atkinson
Bacon
Baker
Baldwin
Banks
Barrow
Bartow
Ben Hill
Berrien
Bibb
Bleckley
Brantley
Brooks
Bryan
Bulloch
Burke
Butts
Calhoun
Camden
Candler
Carroll
Catoosa
Charlton
Chatham
Chattahoochee
Chattooga
Cherokee
Clarke
Clay
Clayton
Clinch
Cobb
Coffee
Colquitt
Columbia
Cook
Coweta
Crawford
Crisp
Dade
Dawson
Decatur
De Kalb
Dodge
Dooly
Dougherty
Douglas
Early
Echols
Effingham
Elbert
Emanuel
Evans
Fannin
Fayette
Floyd
Forsyth
Franklin
Fulton
Gilmer
Glascock
Glynn
Gordon
Grady
Greene
Gwinnett
Habersham
Hall
Hancock
Haralson
Harris
Hart
Heard
Henry
Houston
Irwin
Jackson
Jasper
Jeff Davis
Jefferson
Jenkins
Johnson
Jones
Lamar
Lanier
Laurens
Lee
Liberty
Lincoln
Long
Lowndes
Lumpkin
Mcduffie
Mcintosh
Macon
Madison
Marion
Meriwether
Miller
Mitchell
Monroe
Montgomery
Morgan
Murray
Muscogee
Newton
Oconee
Oglethorpe
Paulding
Peach
Pickens
Pierce
Pike
Polk
Pulaski
Putnam
Quitman
Rabun
Randolph
Richmond
Rockdale
Schley
Screven
Seminole
Spalding
Stephens
Stewart
Sumter
Talbot
Taliaferro
Tattnall
Taylor
Telfair
Terrell
Thomas
Tift
Toombs
Towns
Treutlen
Troup
Turner
Twiggs
Union
Upson
Walker
Walton
Ware
Warren
Washington
Wayne
Webster
Wheeler
White
Whitfield
Wilcox
Wilkes
Wilkinson
Worth

EXHIBIT 4

Sample Advertisements

In-Person Marketing Collateral

FREE
PHONE SERVICE
for households eligible for the Lifeline Program

TruConnect



PROGRAM OVERVIEW

- **FREE** Unlimited Talk
- **FREE** Unlimited Text
- Up to **4.5 GB** of Data
- **FREE** International Calling*

TWO WAYS TO QUALIFY

You can get Lifeline if you or your child/dependent participates in any of the programs listed below**

QUALIFYING PROGRAMS

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP/Food Stamps)
- Federal Public Housing Assistance (FPHA) or Section 8
- Supplemental Security Income (SSI)
- Veterans and Survivors Pension Benefit
- Tribal Bureau of Indian Affairs General Assistance
- Tribal Head Start
- Tribal Temporary Assistance for Needy Families (Tribal TANF)
- Tribal Food Distribution Program on Indian Reservations (FDPIR)

OR

INCOME

135% below Federal Poverty Level

Household Size	Household Income
1	$19,683
2	$26,622
3	$33,561
4	$40,500

For each additional person, add **$6,939**

To sign up for TruConnect's Lifeline Program, visit **www.truconnect.com** or call **1.800.430.0443**.
For terms and conditions, visit **www.truconnect.com/termsandconditions**.

*Select countries include Mexico, Canada, China, Vietnam, and South Korea
**Lifeline is a government assistance program. The service is non-transferable and only eligible consumers may enroll in the program. Limited to one discount per household.

CO-LL-NLAD-ENES-0423

In-Person Marketing Collateral



FREE SMARTPHONE AND SERVICE

for households eligible for the Lifeline and Affordable Connectivity Program

PROGRAM OVERVIEW

- FREE Android™ Smartphone
- FREE Unlimited Talk & Text
- FREE Unlimited Data
- FREE International Calling*

You can get Lifeline or ACP if you or your child/dependent participates in any of the programs listed below.
If you qualify for ***Federal*** Lifeline, you are also qualified for ACP.**

TWO WAYS TO QUALIFY		LIFELINE PROGRAM	AFFORDABLE CONNECTIVITY PROGRAM
1.	Household Income	135% below Federal Poverty Level	200% below Federal Poverty Level
		Household Size / Annual Income Limits: 1 – $19,683; 2 – $26,622; 3 – $33,561; 4 – $40,500. For each additional person, add $6,939	Household Size / Annual Income Limits: 1 – $29,160; 2 – $39,440; 3 – $49,720; 4 – $60,000. For each additional person, add $10,280
OR			
2.	Medicaid	✔	✔
	Supplemental Nutrition Assistance Program (SNAP/Food Stamps)	✔	✔
	Women, Infants, and Children Program (WIC)		✔
	Federal Public Housing Assistance or Section 8	✔	✔
	Supplemental Security Income (SSI)	✔	✔
	Tribal Bureau of Indian Affairs General Assistance	✔	✔
	Tribal Head Start	✔	✔
	Tribal Temporary Assistance for Needy Families (Tribal TANF)	✔	✔
	Tribal Food Distribution Program on Indian Reservations (FDPIR)	✔	✔
	Veterans and Survivors Pension Benefit	✔	✔
	Federal Pell Grant (current award year)		✔
	National School Lunch Program		✔

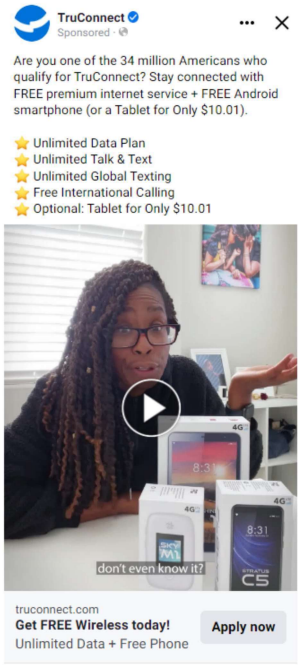
To sign up for TruConnect's Truly Unlimited Plan, visit www.truconnect.com or call 1.800.430.0443.
For terms and conditions, visit www.truconnect.com/termsandconditions.

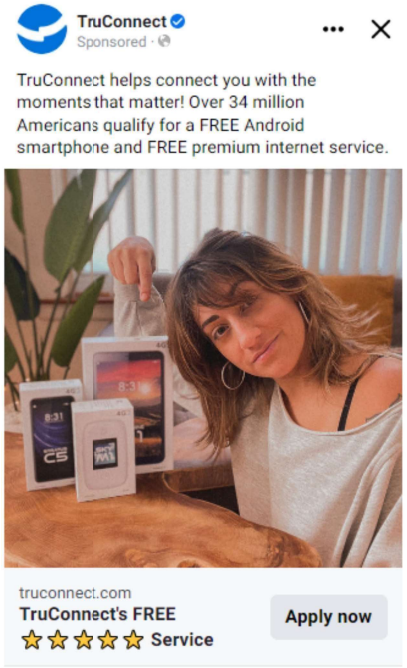
*Select countries include Mexico, Canada, China, Vietnam, and South Korea
**Lifeline is a government assistance program. The service is non-transferable and only eligible consumers may enroll in the program. Limited to one discount per household. Only one ACP benefit and one device discount are allowed per household.

CQ-ACPLL-NLAD-ENES-0423

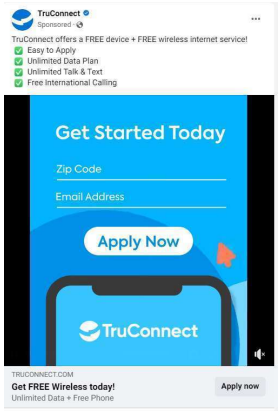
Online Advertisement | Social Media

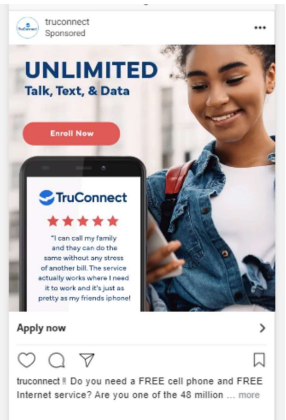












TruConnect

Online Advertisement | Display Ads | Search Engines





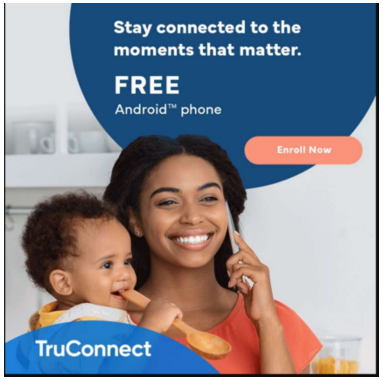


EXHIBIT 5

Management Bios

Nathan Johnson
Co-Chief Executive Officer

Nathan is an Owner and Chairman & Co-CEO of TruConnect, where he oversees the strategic vision and effective governance of the organization. He has co-managed the overall operations and growth of the business with his brother for the last 15 years. Mr. Johnson is also a Founder and Managing Partner of Drake Star Partners, a global M&A Advisory Firm with offices throughout the US and Europe, where he leads efforts on restructuring and bankruptcy advisory. Prior to Drake Star Partners, Mr. Johnson served as Director of Overseas Finance for GM's Treasury Office in NY where he oversaw all M&A, divestitures and investments in Latin America. Mr. Johnson received his MBA & MA from the Wharton School & Lauder Institute at the University of Pennsylvania with a concentration in Finance and Multinational Management. His focus at the Lauder Institute was a specialized international management program with concentration on fluency in Spanish and International Studies.

Matthew Johnson
Co-Chief Executive Officer

Matthew led TruConnect to prominence as the 4th largest wireless lifeline company and fastest growing in the United States with over 600,000 customers nationwide, in his role as Co-Founder, Board Member, and Co-CEO. With his brother Nathan Johnson, Matthew built the company with both internal growth and acquisitions including Telscape Communications, Sage Telecom, and TruConnect Mobile among others. Along with his focus on TruConnect, Mr. Johnson is also a Managing Partner and Board Member of Drake Star Partners, a global technology investment bank headquartered in New York with offices in eight countries. A member of Young Presidents Organization ("YPO") and a two time finalist for E&Y's Entrepreneur of the Year. Matthew also serves as Chairman for UCP Wheels for Humanity, a non-profit supplying wheelchairs to disabled children and young adults globally. Matthew holds an MBA from Northwestern University's Kellogg School of Management.

Scott Southron
Chief Financial Officer

Scott is a senior executive with over 35 years of experience in investment banking, financial planning, and strategic business growth. Through a purpose-driven lens, Scott's capital funding expertise fortifies TruConnect's customer acquisition and long-term fiscal stability goals to achieve profitability. Most recently, he spent nine years at CarrierX, supporting organizational efforts in serving millions of customers worldwide through a robust arsenal of connectivity applications. His talent comes from several senior finance and operations roles, most recognizably at The Walt Disney Company.

Danielle Perry
Chief Compliance Officer

Danielle is TruConnect's Chief Compliance Officer, where she is responsible for leading all compliance and regulatory related aspects of the organization. Danielle maintains over 20 years of experience in the telecommunications industry, with 15 of those years being focused on the Lifeline program. She held senior management positions on both operations and technology teams, in addition to working closely with state and federal agencies on numerous integration projects. Prior to her tenure at TruConnect, Danielle served as the Chief Information Officer at Blue Jay Wireless.

Andrew Magaña
Chief Operations Officer

Andrew leads TruConnect's operations including global PMO, sales operations, device strategy, supply chain, fulfillment, as well as offshore and onshore customer and sales agent support. Andrew brings over 20 years of experience in strategy, operations, and revenue management in the high-growth technology and commercial real estate industries. Prior to TruConnect, Andrew was Divisional President and Regional General Manager at Postmates, spearheading revenue growth from $175M to $700M and its subsequent sale/merger with Uber. He was also the General Manager for Uber Ridesharing in California and Hawaii, achieving 8x business growth in 4 years. Before his technology career, he worked as an investment professional at the Magellan Group, overseeing the development of over $300M in commercial real estate. Andrew holds an MBA from Stanford University Graduate School of Business and a BS from the US Naval Academy.

Lucy Sung
Chief Administrative Officer

Lucy leads TruConnect's legal, customer care, and billing operations teams. She is a proven executive team leader, with over 30 years of experience in the wireless telecommunications industry and 15 years of experience managing the operations and expansion of wireless eligible telecommunications carriers (ETCs). She has held senior management positions in companies that include AT&T, among others. Lucy holds a BS in Business Administration.

Kevin Lucier
Chief Technology Officer

Kevin leads TruConnect's engineering, business intelligence (BI), product management and customer experience teams, coordinating the design and development of products from concept to reality. With over 25 years of technology leadership experience in ecommerce and SaaS platforms, Kevin has worked for industry-leading companies such as BeautyCounter, Sugarfina, Toyota, and Herbalife. He maintains deep knowledge in both B2B and B2C systems, MLM/Direct Selling, system integration, and is very active in the

Los Angeles start-up community as an advisor and investor. Kevin holds a degree in Electrical/Electronics Engineering from St. Clair College and University of Windsor.

Ashley Lewis
Chief Product Officer

Ashley is responsible for building TruConnect's product vision and strategy. With over 15 years of experience managing consumer technology products at LA-based startups, Ashley has led product management teams at Sidecar Health, NEXT Trucking, and Dollar Shave Club. She was also an early employee at Dog Vacay, where she oversaw the consumer experience and mobile app teams. Ashley holds two patents for her work in the early days of native mobile applications. She received an MBA from the UCLA Anderson School of Management and a BA in Global Studies from UC Santa Barbara.

EXHIBIT 6

Proposed Lifeline Offering

TRUCONNECT WIRELESS GEORGIA LIFELINE OFFERING

LIFELINE PLAN	VOICE	TEXT (SMS)	DATA (High Speed)	Free International Calling	Lifeline Price
Lifeline Only	Unlimited	Unlimited	4.5 GB	Canada, Mexico, China, Vietnam, South Korea	$0.00

"TOP-UPS"	Price
International Top Up (55 Countries)	$5
500 MB High Speed Data	$5
1 GB High Speed Data	$10
3 GB	$20
8 GB	$30

All packages include:

- Free calls to TruConnect 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