

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF THE APPLICATION
OF GLOBAL CONNECTION INC. OF
AMERICA D/B/A STAND UP WIRELESS
FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER ON
A WIRELESS BASIS (LOW INCOME
ONLY)**

Case No. RA-2011-0299

**AMENDMENT TO APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER ON A WIRELESS BASIS**

COMES NOW Global Connection Inc. of America d/b/a Stand Up Wireless (“Stand Up Wireless” or the “Company”) and, pursuant to 4 CSR 240-2.080(20) files this Amendment to its Application for Designation as an Eligible Telecommunications Carrier on a Wireless Basis (“Application”). In support of its Amendment, Stand Up Wireless states as follows:

1. On March 23, 2011, Stand Up Wireless filed its Application for Designation as an Eligible Telecommunications Carrier on a Wireless Basis. In paragraph 14 of its Application, the Company states:

Where available and conditions warrant, Stand Up Wireless can capture a customer’s signature electronically on any web accessible computer or electronic tablet computer (iPad or similar) with the enrollment form on the screen. In those circumstances, customers would sign their applications using their finger, stylus or mouse, and the application would be stored digitally. All digital submissions will automatically be verified against the United States Postal Service database for address verification as well as scrubbed against both Stand Up Wireless’ current customer enrollment and Global Connection’s landline enrollment to help ensure no duplicate orders are processed for the same head of household/household address. This process would also be web enabled allowing customers to complete their applications on-online at www.StandUpWireless.com and applications would be signed electronically.

2. After consultation with Staff of the Missouri Public Service Commission, which requested additional information regarding electronic signatures, Stand Up Wireless respectfully requests that Paragraph 14 of its Application be amended to add the following statement:

Any and all transactions handled digitally will be subject to the same requirements as paper based transactions. For example, the customer form will be identical whether digital or on paper. In addition, prior to initiating lifeline service, Stand Up will require proof of eligibility and will attest to having attained that proof for each applicant.

In summary, before initiating lifeline service, the customer must show proof of eligibility, a Stand Up representative must give a attestation of seeing that proof, Stand Up wireless will verify that the customer / household is not duplicated in its wireless and/or wireline lifeline database and the address is found on the USPS database. Also, before submitting an account to USAC, Stand Up will have a third party (CGM) audit the customer database and provide a second layer of quality control. The quality checks in place are not impacted by whether the process is handled via paper or electronically.

WHEREFORE, Stand Up Wireless respectfully requests that Paragraph 14 of its Application for Designation as an Eligible Telecommunications Carrier on a Wireless Basis be amended to add the above quoted language.

Respectfully submitted,

**GLOBAL CONNECTION INC. OF AMERICA
D/B/A STAND UP WIRELESS**

By: /s/ Lisa A. Gilbreath

Mark P. Johnson MBN 30740

Lisa A. Gilbreath MBN 62271

SNR Denton US LLP

4520 Main, Suite 1100

Missouri City, Missouri 64111

Telephone: (816) 460-2424

Facsimile: (816) 351-7545

mark.johnson@snrdenton.com

lisa.gilbreath@snrdenton.com

and

Stanley Q. Smith
WATKINS LUDLAM WINTER & STENNIS,
P.A.
190 E. Capitol Street, Suite 800 (39201)
P. O. Box 427
Jackson, Mississippi 39205-0427
Telephone: (601) 949-4863
Facsimile: (601) 949-4804
stansmith@watkinsludlam.com

CERTIFICATE OF SERVICE

I hereby certify that I have this the 30th day of September, 2011, served a true copy of the foregoing Amendment upon the following parties, listed below, in accordance with Commission

Rules:

Office of the Public Counsel
Post Office Box 7800
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
Post Office Box 360
Jefferson City, MO 65102

/s/Lisa A. Gilbreath
Lisa A. Gilbreath