

**BEFORE THE  
STATE OF MISSOURI PUBLIC SERVICE COMMISSION**

Application of AmeriMex Communications )  
Corp. d/b/a SafetyNet Wireless )  
for Designation as an Eligible ) Case No. \_\_\_\_\_  
Telecommunications Carrier )

---

**APPLICATION**

Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

William D. Steinmeier  
William D. Steinmeier, P.C.  
2031 Tower Drive  
Jefferson City, MO 65109  
(573) 659-8672 (Phone)  
[wds@wdspc.com](mailto:wds@wdspc.com) (E-mail)

*Attorneys for AmeriMex Communications Corp.  
d/b/a SafetyNet Wireless*

May 28, 2020

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	COMPANY OVERVIEW .....	3
III.	THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCs .....	4
IV.	SAFETYNET SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201 .....	5
	A. SAFETYNET Will Provide Service Consistent With the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements .....	6
	B. SAFETYNET Is a Common Carrier .....	7
	C. SAFETYNET Will Provide All Supported Services .....	7
	1. Voice Telephony Service .....	7
	2. Broadband Internet Access Services .....	8
	D. SAFETYNET Requests Designation Throughout its Service Area .....	8
	E. SAFETYNET Will Advertise the Availability of Supported Services .....	10
V.	SAFETYNET SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a) .....	11
	A. Service Commitment Throughout the Proposed Designated Service Area .....	11
	B. Ability to Remain Functional in Emergency Situations .....	11
	C. Commitment to Consumer Protection and Service Quality .....	12
	D. Financial and Technical Capability .....	12
	E. Terms and Conditions of Proposed Lifeline Offering .....	13
	F. SAFETYNET Will Comply with the Lifeline Certification and Verification Requirements .....	14
	G. Prevention of Waste, Fraud and Abuse .....	15
VI.	INFORMATION REQUIRED BY 20 CSR 4240-31.016 .....	17
VII.	DESIGNATION OF SAFETYNET AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST .....	18
	A. Advantages of SAFETYNET’s Service Offering .....	19
	B. The Benefits of Competitive Choice .....	20
	C. Impact on the Universal Service Fund .....	21
VIII.	CONCLUSION .....	22

## I. INTRODUCTION

AmeriMex Communications Corp. d/b/a SafetyNet Wireless (“SAFETYNET” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Missouri Public Service Commission (the “Commission”) including 20 CSR 4240-31.015 and 20 CSR 4240-31.016, hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri (“Application”). SAFETYNET seeks ETC designation solely to provide Lifeline service to qualifying Missouri 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.<sup>3</sup>

As demonstrated herein, and as verified in Exhibit 1 attached hereto, SAFETYNET meets all the statutory and regulatory requirements for designation as an ETC in the State of Missouri, including the requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*,<sup>4</sup> *Lifeline Modernization Order*,<sup>5</sup> and *Fifth Report and Order*.<sup>6</sup> Rapid grant of SAFETYNET’s request,

---

<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

<sup>3</sup> 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.

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

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

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 Missouri 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:

Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
Attorneys for AmeriMex Communications Corp. d/b/a SafetyNet Wireless  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

With a copy to the Company's local counsel:

William D. Steinmeier  
William D. Steinmeier, P.C.  
2031 Tower Drive  
Jefferson City, MO 65109  
(573) 659-8672 (Phone)  
E-Mail: [wds@wdspsc.com](mailto:wds@wdspsc.com)

---

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

## II. COMPANY OVERVIEW

AmeriMex Communications Corp. d/b/a SafetyNet Wireless is a Georgia Corporation,<sup>7</sup> with its principal office located at 2323 Curlew Road, Suite 7B, Dunedin, Florida 34698 (telephone: (727)-386-8601, email: steve@safetynetwireless.com ). SAFETYNET does not have a parent company nor any subsidiaries. SAFETYNET is a provider of commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of T-Mobile USA, Inc. and Sprint (“Underlying Carrier”) on a wholesale basis. SAFETYNET obtains from its Underlying Carrier the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”). SAFETYNET is currently designated as an ETC in the following jurisdictions: California, Colorado, Georgia, Kentucky, Michigan, Oklahoma, Pennsylvania, and Wisconsin. SAFETYNET also has a petition pending in the State of New York (Case No. C-20-01098, filed May 15, 2020).

SAFETYNET will provide affordable prepaid mobile phone service and high-quality customer service. SAFETYNET’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” or purchase one from SAFETYNET. The Company will not require service contracts from its customers and it will always ensure competitively low pricing for its services and products. SAFETYNET 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-

---

<sup>7</sup> The Company was incorporated in the State of Georgia on July 15, 1998. See attached Exhibit 7 for documentation from the Secretary of State showing the Company is authorized to do business in Missouri along with the d/b/a name registration.

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.

SAFETYNET's Lifeline customers will be low-income consumer households that will depend on, and benefit greatly from, SAFETYNET's inexpensive and flexible pricing plans. SAFETYNET will not impose credit checks nor will it require any deposits or contractual commitments. Most of SAFETYNET's customers likely will turn to SAFETYNET because they cannot afford the postpaid services provided by traditional wireless carriers. SAFETYNET will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, SAFETYNET will contribute to the expansion of mobile wireless and broadband services for low-income consumers in Missouri.

### **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.<sup>8</sup> 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.<sup>9</sup> Therefore, the Commission has the authority to designate SAFETYNET as an ETC. Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier.<sup>10</sup> Under the Act, a state public utility commission with jurisdictional authority over ETC

---

<sup>8</sup> 47 U.S.C. § 214(e)(2).

<sup>9</sup> *USF Order*, at 8858–59, ¶ 145.

<sup>10</sup> See e.g., *In the Matter of Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households*, Case No. TA-2009-0327, Order, (Eff. September 5, 2009) ("*TracFone ETC Order*").

designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1).

SAFETYNET recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.<sup>11</sup> 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 SAFETYNET. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant SAFETYNET's request for designation as an ETC throughout the State of Missouri.

#### **IV. SAFETYNET 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.<sup>12</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's

---

<sup>11</sup> See *Lifeline and Link Up Reform Order* at ¶ 368.

<sup>12</sup> See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("*USF Order*").

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 also must commit to advertise the availability and rates of such services.<sup>13</sup> As detailed below, SAFETYNET satisfies each of the above-listed requirements.

**A. SAFETYNET 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 SAFETYNET. 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:<sup>14</sup>

(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*, SAFETYNET filed a Compliance Plan with the FCC, which the FCC approved on December 26, 2012.<sup>15</sup> A copy of its

---

<sup>13</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

<sup>14</sup> See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

<sup>15</sup> See FCC Public Notice DA 12-2063, <https://www.fcc.gov/document/wcb-approves-nine-lifeline-compliance-plans>.



FCC-Approved Compliance Plan is attached hereto as Exhibit 2. SAFETYNET commits to providing Lifeline service in Missouri in accordance with its FCC-approved Compliance Plan and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

**B. SAFETYNET Is a Common Carrier**

CMRS providers like SAFETYNET are treated as common carriers.<sup>16</sup>

**C. SAFETYNET Will Provide All Supported Services**

Through its Underlying Carrier, SAFETYNET 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. SAFETYNET provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from T-Mobile and/or Sprint.

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

Access to Emergency Services. SAFETYNET provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available

---

<sup>16</sup> *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services*.")) (emphasis added).

regardless of service activation status or availability of minutes. SAFETYNET 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.<sup>17</sup> “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.”<sup>18</sup> Nonetheless, SAFETYNET'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. SAFETYNET'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**

Broadband Internet access service (“BIAS”) is a supported service as of December 2, 2016. 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.”<sup>19</sup> SAFETYNET provides BIAS to low-income consumers via resale of T-Mobile and/or Sprint services.

### **D. SAFETYNET Requests Designation Throughout Its Service Area**

SAFETYNET is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, SAFETYNET is required to describe the geographic area(s) within which it requests designation as an ETC. SAFETYNET requests ETC designation that is

---

<sup>17</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>18</sup> See *id.* at ¶ 49.

<sup>19</sup> See 47 C.F.R. § 8.2(a).

statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage. The current zip code coverage footprint is attached hereto as Exhibit 3. SAFETYNET understands that its service area overlaps with rural carriers in Missouri, 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. SAFETYNET is not eligible for and does not seek Link-Up or high-cost support.

Therefore, designation of SAFETYNET as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”<sup>20</sup> 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.<sup>21</sup> In light of this forbearance, the Commission has the authority to designate ETCs such as SAFETYNET in rural areas without concern for the service area conformance requirement.<sup>22</sup>

---

<sup>20</sup> See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, Memorandum Opinion and Order, 16 FCC Rcd 48, 55 (2000).

<sup>21</sup> See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

<sup>22</sup> See 47 C.F.R. § 54.207(c).

**E. SAFETYNET Will Advertise the Availability of Supported Services**

SAFETYNET 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). SAFETYNET will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, SAFETYNET'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) SAFETYNET is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Additionally, SAFETYNET 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.

SAFETYNET 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. SAFETYNET may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service. In addition, SAFETYNET 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. SAFETYNET 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. SAFETYNET SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)**

SAFETYNET 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**

SAFETYNET will provide service in Missouri by reselling service which it obtains from its Underlying Carrier. The Underlying Carrier's network is operational and largely built out. Thus, SAFETYNET will be able to commence offering its Lifeline service to all locations served by its Underlying Carrier very soon after receiving approval from the Commission.

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and as verified in attached Exhibit 1, SAFETYNET commits to comply with the service requirements applicable to the low-income support that it receives. SAFETYNET will comply with the FCC's *Fifth Report and Order* once the rule changes set forth therein become effective.<sup>23</sup> 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), SAFETYNET has the ability to remain functional in emergency situations. As discussed, SAFETYNET will utilize the extensive and well-established T-Mobile and/or Sprint network and facilities to provide its Lifeline services.

---

<sup>23</sup> The order is effective January 27, 2020, except for section 54.406(b) [*Prohibition of commissions for enrollment representatives*], which is effective February 25, 2020, and section 54.406(a) [*Enrollment representative registration*], which is effective March 26, 2020. Revisions to Sections 54.404(b)(12) [*relating to not enrolling/claiming a subscriber unless they are verified to be alive*] and 54.410(f) [*changes to recertification*] are delayed and the FCC will publish a document announcing the effective date.

The Company understands that the Underlying Carrier's network has access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. Indeed, its Underlying Carrier has repeatedly certified to the FCC that its network functions in emergency situations.<sup>24</sup> The Underlying Carrier provides the same functionality to SAFETYNET and its customers as it provides to itself and its own customers.

**C. Commitment to Consumer Protection and Service Quality**

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

**D. SAFETYNET is Financially and Technically Capable**

In accordance with 47 C.F.R. § 54.202(a)(4), SAFETYNET is financially and technically capable of providing Lifeline-supported services. SAFETYNET is currently offering Lifeline service in eight (8) jurisdictions. SAFETYNET does not and will not rely exclusively on USF disbursements to operate. SAFETYNET has not been subject to enforcement action or ETC revocation proceedings in any state. In addition, SAFETYNET's financial and technical capabilities to provide service are demonstrated by its performance over six years in wireless Lifeline. Furthermore, the senior management of SAFETYNET has great depth in the telecommunications industry and offers extensive telecommunications business technical and

---

<sup>24</sup> See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

managerial expertise to SAFETYNET (see Exhibit 4). SAFETYNET will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carrier.

**E. Terms and Conditions of Proposed Lifeline Offering**

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

Attached hereto as Exhibit 5 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers will receive 350 voice minutes, unlimited text messages, and 3 gigabytes (GB) of data per month at a net cost of \$0.00 after application of Lifeline support.<sup>25</sup> Customers will be able to purchase additional minutes or data as needed. All plans will include nationwide domestic long-distance at no extra per-minute charge, and SAFETYNET will not assess any usage for access to its free customer services (611).

---

<sup>25</sup> The current rate plan is based upon the 2020 FCC minimum service standards ("MSS") and will change based on the future MSS.

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. SAFETYNET'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.

SAFETYNET is taking many measures to ensure its Lifeline customers retain access to broadband/voice service during the COVID-19 pandemic as follows:

- a. Working with our wholesale network operator partners to temporarily provide more minutes and as much as 5 GB *more* of mobile broadband to many of our subscribers for free;
- b. Providing access to hotspot capability on equipped smartphones for free;
- c. Providing reduced cost upgrades to hotspot capable devices for subscribers who do not have them;
- d. Providing access to the 4G networks of our wholesale partners for free;
- e. Working with our wholesale partners to explore viable roll-over options;
- f. Posting and providing clear instructions to subscribers on how to access smartphone hotspot capability; and
- g. Signed the FCC's Keep America Connected Pledge to ensure customers do not lose their broadband and telephone service during the crisis.

In addition, please see Exhibit 6 which is attached hereto, a letter from SAFETYNET to over 20 United States Senators.

#### **F. SAFETYNET Will Comply with the Lifeline Certification and Verification Requirements**

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. Customers must then apply directly through the National Lifeline Eligibility Verifier ("National Verifier"), which they may do online or by submitting all required



documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier's or Company's website) or request that a copy be mailed to them. SAFETYNET 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).<sup>26</sup> SAFETYNET will certify and verify initial and continued consumer eligibility in accordance with 47 C.F.R. § 54.410, and will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. SAFETYNET further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers' applications and determination of eligibility will be performed by the National Verifier.

#### **G. Prevention of Waste, Fraud and Abuse**

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. SAFETYNET will rely on the National Verifier to determine initial and ongoing eligibility of Missouri 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 SAFETYNET or any other ETC, and whether anyone else living at the prospective subscriber's residential address is

---

<sup>26</sup> *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC's website (*See* USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

currently receiving Lifeline service. SAFETYNET thus complies with the requirements of section 54.404 of the FCC's rules. In addition, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers.

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), SAFETYNET will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

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

funds.

## **VI. INFORMATION REQUIRED BY 20 CSR 4240-31.016**

Pursuant to 20 CSR 4240-31.016(2)(A) and 20 CSR 4240-2.060, Exhibit 1 provides the required affidavit under oath and the required Company information was provided in Section II (and Exhibit 7) of this Application. To the best of the Company's knowledge, SAFETYNET does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates within the past three (3) years, and no annual report or assessment fees are overdue.

SAFETYNET further provides the following information in accordance with 20 CSR 4240-31.016(2)(B):

1. Identify any individual or entity having a ten percent (10%) or more ownership interest in the applicant.

Donald Aldridge and Stephen Klein

2. Identify all officers, directors, and other persons, regardless of title, who fill the role of officer or director of the company.

Donald Aldridge, CEO and Director; Stephen Klein, President and Director

3. Identify any company sharing common ownership or management with the applicant that has ever received funds from the federal USF or any state universal service fund.

None

4. Provide the details of any matter brought in the last ten (10) years by any state or federal regulatory or law enforcement agency against any of the individuals, entities, managers, officers, directors of other companies sharing common ownership or management with the applicant involving fraud, deceit, perjury, stealing, or the omission or misstatement of material fact in connection with a commercial transaction;

None

5. The website containing information about the SAFETYNET service and rates:

<https://safetynetwireless.com/>.

SAFETYNET commits to comply with the ETC requirements set forth in 20 CSR 240-31.015 and to notify the Commission of any changes to company contact information. To the best of the Company's knowledge, SAFETYNET is compliant with contribution obligations to the federal USF. SAFETYNET does not currently intend to seek support from the Missouri USF or participate in the Disabled program, but reserves the right to seek such participation and support in the future.

#### **VII. DESIGNATION OF SAFETYNET 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.<sup>27</sup> Designation of SAFETYNET as an ETC in Missouri 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

---

<sup>27</sup> *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”<sup>28</sup> Given this context, designating SAFETYNET as an ETC would significantly benefit low-income consumers eligible for Lifeline services in Missouri—the intended beneficiaries of universal service.

**A. Advantages of SAFETYNET’s Service Offering**

SAFETYNET 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 SAFETYNET’s wireless service include larger calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile service, and a generous amount of voice and broadband access included without cost (after application of the Lifeline support), as well as free access to caller ID, call waiting, and Voicemail features, and access to 911 services regardless of the number of voice minutes remaining on the Lifeline consumer’s plan. These no cost to consumer services and low-cost minutes are an invaluable resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for “unbanked” consumers.

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

---

<sup>28</sup> See *Lifeline Modernization Order* ¶ 2.

after application of Lifeline support. SAFETYNET'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 Lifeline service is essential not only for access to telephone service, but also to bridging the digital divide through provision of mobile broadband usage which is critical to full participation in modern society.

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 SAFETYNET 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.<sup>29</sup> Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of SAFETYNET as an ETC will help ensure

---

<sup>29</sup> See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.<sup>30</sup> Introducing SAFETYNET into the market as an additional wireless ETC provider will afford low-income Missouri residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

### **C. Impact on the Universal Service Fund**

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as SAFETYNET 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, SAFETYNET 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 SAFETYNET’s customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. SAFETYNET’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.

---

<sup>30</sup> See 47 U.S.C. § 254(b)(1).

## VIII. CONCLUSION

Based on the foregoing, designation of SAFETYNET as an ETC in the State of Missouri complies with the requirements of Section 214(e)(2) of the Act and is in the public interest.

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

Respectfully submitted,

*/s/ Lance J.M. Steinhart*

---

Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

*/s/ William D. Steinmeier*  
William D. Steinmeier, MoBar No. 25689  
William D. Steinmeier, P.C.  
2031 Tower Drive  
Jefferson City, MO 65109  
(573) 659-8672 (Phone)  
[wds@wdspc.com](mailto:wds@wdspc.com) (E-mail)

*Attorneys for AmeriMex Communications Corp.  
d/b/a SafetyNet Wireless*

May 28, 2020



**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)) and on the Office of the Public Counsel (at [opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)) on this 28th day of May 2020.

*/s/ William D. Steinmeier*

---

William D. Steinmeier

**TABLE OF EXHIBITS**

	<u>Exhibit</u>
Verification .....	1
FCC-Approved Compliance Plan.....	2
Coverage Area .....	3
Key Management Bios.....	4
Proposed Lifeline Offering .....	5
COVID-19 Letter to United States Senators.....	6
Secretary of State Authorizations .....	7



**EXHIBIT 2**

**FCC-Approved Compliance Plan**

RECEIVED

JUL 23 2013

PUBLIC SERVICE  
COMMISSION

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
AmeriMex Communications Corp. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)	)	WC Docket No. 11-42
	)	

**AMERIMEX COMMUNICATIONS CORP. REVISED COMPLIANCE PLAN**

AmeriMex Communications Corp. (“AmeriMex” or “Company”), by its attorney, hereby files its compliance plan outlining the measures it will take to implement the conditions imposed by the Federal Communications Commission (“Commission”) in its *Order* released February 6, 2012.<sup>1</sup> AmeriMex respectfully requests expeditious approval of this plan so that it may continue to provide critical Lifeline services to qualified low income customers.<sup>2</sup>

**BACKGROUND**

The Commission’s *Order* grants non-facilities-based carriers blanket forbearance from Section 214(e)(1)(A), which requires an ETC to provide supported services, at least in part, over its own facilities, in order to receive federal Lifeline support.<sup>3</sup> Those ETCs that were providing

---

<sup>1</sup> *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*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) (“*Order*”) at ¶ 522-523.

<sup>2</sup> AmeriMex provides Lifeline services in Georgia pursuant to its designation as an Eligible Telecommunications Carrier (“ETC”) by the Georgia Public Service Commission. Georgia Public Service Commission, *Order on Application For Designation as Eligible Telecommunications Carrier*, Document Filing No. 139089, Docket No. 32948 (Nov. 21, 2011). The wireless service is provided by AmeriMex Wireless, a division of AmeriMex. The company may expand its Lifeline offerings to eligible customers in additional states following approval of this compliance plan.

<sup>3</sup> *Order* at ¶1.

Lifeline services prior to the effective date of the *Order*, were required to meet certain obligations set forth in the *Order*. Those obligations, created to guard public safety and prevent ongoing waste, fraud and abuse of the Lifeline program, are:<sup>4</sup>

- 1) Compliance with certain 911 and enhanced 911 public safety requirements, and
- 2) Submission before July 1, 2012 of the carrier's compliance plan; which must be approved by the FCC before the carrier could seek additional ETC designations.

As required by the *Order*, the compliance plan must include details pertaining to the carrier's 1) financial, operational and technical capabilities, 2) rates, terms and conditions of service, 3) procedures for determining initial eligibility of its Lifeline services, as described in Appendix C of the *Order*, 4) procedures for enrollment and annual recertification, 5) policies for compliance with public safety and 911/E911 access, 6) policies for compliance with marketing disclosure requirements and 7) intended efforts to prevent waste, fraud and abuse of the Lifeline program.

**A. COMPLIANCE PLAN**

AmeriMex commits to comply with conditions that the Commission has set forth in the *Order*, the requirements described in this Compliance Plan, and any and all laws and regulations that govern the Lifeline-supported prepaid wireless service.

**I. Financial, Operational and Technical Information**

AmeriMex does not operate under any other names, nor does it have any holding company, operating company or affiliates.<sup>5</sup> AmeriMex, a privately held Georgia corporation, began offering telecommunications services in 1998. Over the course of six years, AmeriMex

---

<sup>4</sup> *Id.* at ¶368.

<sup>5</sup> *Id.* at ¶390.

expanded from a long distance calling card distributor to a competitive local exchange carrier (“CLEC”), providing residential wireline service to more than 20,000 customers. As a CLEC, AmeriMex’s operations spanned 10 states and included a distribution network of approximately 800 Hispanic merchants.<sup>6</sup> In 2006, AmeriMex became a full facilities based carrier. The Company has a MetaSwitch VP3510 which supports TDM and IP interfaces. Currently, AmeriMex offers domestic and international calling services, and since December 2011, the Company has begun offering wireless ETC service. AmeriMex provides wireless ETC services to approximately 70,000 customers by reselling the services of Ready Mobile, a reseller of Sprint and Verizon Wireless services. The wireless ETC service represents less than 30 percent of AmeriMex’s total revenues.

The Company’s key management, including its founder and Chief Executive Officer, Don Aldridge, and the Vice President of Technology, Alejandro Caipa, has significant technical and managerial experience providing prepaid, wireline and wireless services to consumers.<sup>7</sup> Mr. Aldridge is a Certified Public Accountant and holds a Masters of Business Administration from Virginia Tech. Mr. Caipa, employed by AmeriMex for more than 10 years, has a degree in electrical engineering and a Masters degree in Technology Management from Georgia Tech. Mr. Caipa previously worked for ETB, a telephone company in Bogota, Columbia. The Company increased revenues by approximately 21% between 2010 and 2011 and reported profits for both years. In addition to its financial and technical qualifications, AmeriMex has the operational capabilities to provide quality service, including providing 911/E911.<sup>8</sup>

---

<sup>6</sup> [http://www.amerimex.biz/index.php?option=com\\_content&view=article&id=89&Itemid=65](http://www.amerimex.biz/index.php?option=com_content&view=article&id=89&Itemid=65) (retrieved Mar. 26, 2012).

<sup>7</sup> Order at ¶¶387-388.

<sup>8</sup> 47 C.F.R. §54.202(a)(2).

## II. Lifeline Rate Plans

AmeriMex offers the following rate plans, which are available to eligible Lifeline subscribers.<sup>9</sup> Each rate plan is subject to a one-time \$25 activation fee.<sup>10</sup>

250 Free Minutes and a Free Phone: This plan includes a phone plus 250 free voice minutes. Unused minutes expire at the end of the last day of their cycle. The account is then automatically replenished with the next month's 250 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes in increments of \$5, \$10, \$20, \$30 and \$50 denominations, with the price ranging from \$.10 to \$.03 per minute. This plan includes nationwide coverage, voice mail, call waiting, Caller ID and text-messaging (one text equates to one minute of airtime).

125 Free Minutes and a Free Phone: This plan includes a phone plus 125 free minutes. Unused minutes may be carried over to the next month for up to three months. Each month, the account is automatically replenished with the next month's 125 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes in increments of \$5, \$10, \$20, \$30 and \$50 denominations, with the price ranging from \$.10 to \$.03 per minute. This plan includes nationwide coverage, voice mail, call waiting, Caller ID and text-messaging (one text equates to one minute of airtime).

68 Free Minutes and a Free Phone: This plan includes a phone plus 68 free minutes. Unused minutes may be carried over to the next month for up to 12 months. Each month, the account is automatically replenished with the next month's 68 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes in increments of \$5, \$10,

---

<sup>9</sup> Order at ¶390, see Exhibit B. At this time, AmeriMex is only offering Lifeline services in Georgia.

<sup>10</sup> This fee helps to offset the cost of the handsets provided to Lifeline subscribers.



\$20, \$30 and \$50 denominations, with the price ranging from \$.10 to \$.03 per minute. This plan includes nationwide coverage, voice mail, call waiting, Caller ID and text-messaging (three texts equate to one minute of airtime).

There is no additional charge for toll calls. Calls to 911 are free.

### **III. Certification of Lifeline Customers' Eligibility**

#### **A. Policy**

AmeriMex will comply with all certification and verification requirements for Lifeline eligibility in accordance with the *Order*, and supplement its efforts, as necessary, in states where it is designated as an ETC. For any states which do not mandate Lifeline support and/or which do not have established rules of procedure in place, AmeriMex will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements.

#### **B. Eligibility and Enrollment**

AmeriMex will implement procedures to determine a consumer's Lifeline eligibility. The baseline eligibility, developed to counter the "patchwork" of state by state criteria, to streamline the enrollment process and to facilitate the completion of the National Database by the end of the 2013, is participation in one of several federal subsidy programs, including, but not limited to, Food Stamps, Medicaid and WIC programs, or evidence that the consumer's income is at or below 135% of the Federal Poverty Guidelines ("FPG"). States may elect to "adopt participation in certain federal or state assistance programs not included in the Commission's list of eligible programs...provided the program is based on income or factors directly related to income."<sup>11</sup> Participation in qualifying programs may be determined through

---

<sup>11</sup> *Order* at ¶65, FN 168.

the use of state or national data sources (where available) or provided directly from the consumer in the form of supporting documentation. AmeriMex will not retain copies of the consumer's supporting documentation, but will retain details regarding the type of documentation presented and the date such documentation was presented.

AmeriMex will not provide wireless ETC service to any individual that does not have a valid government issued identification. AmeriMex also conducts real time address verification and those addresses are crosschecked against any other providers serviced by CGM, LLC.<sup>12</sup>

### **C. Certification Procedures**

AmeriMex will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting AmeriMex, or one of its merchant distributors, in person or via telephone, facsimile, or the Internet. AmeriMex will have direct contact with all customers applying for Lifeline service, either in person through its employees, agents or representatives, via the Company's website, via the telephone (including facsimile) or mail. AmeriMex will provide Lifeline-specific training to all personnel, whether employees, agents or representatives at authorized locations, that interacts with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. AmeriMex understands and acknowledges its responsibility for the acts and omissions of its employees, agents and representatives.<sup>13</sup>

Consumers may be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to AmeriMex's website, which will contain a

---

<sup>12</sup> CGM's program allows AmeriMex to crosscheck for duplicates within AmeriMex's existing customer database and to establish customer accounts in real time.

<sup>13</sup> Order at ¶110.

link to information regarding its Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Consumers will be provided with printed information describing AmeriMex's Lifeline program, including eligibility and usage requirements and disclosures that clearly indicate that consumers are required to certify the documentation presented, under the penalty of perjury, which may result in disqualification from the program, a penalty or imprisonment. Consumers opting to contact AmeriMex using the toll-free telephone number will be provided verbal details regarding the available Lifeline services, as well as the rates, conditions or terms of service, including the ongoing requirement to regularly update certain information and to re-certify eligibility, and the requisite acknowledgements and certifications.<sup>14</sup> Details regarding the separate points of contact (retail, telephone or internet) are provided below.

AmeriMex's application form for its wireless service will identify that it is a "Lifeline" application. The AmeriMex application form, attached hereto as Exhibit A, will include two sections to be completed by the applicant. The first section requires applicants to provide 1) personal information such as name, address, date of birth, last four digits of their social security number ("SSN") and 2) identify, with a check mark, and certify, using their initials, which qualifying program(s) they are currently participating in or if they have a household income which is at or below the 135% of the FPG and the number of household members and total income. The second section of the application form will require applicants to identify, with a check mark, and certify, with a complete signature and date, under penalty of perjury, certain statements, including, but not limited to, the following:

---

<sup>14</sup> See Call Center Script at Exhibit C.

The information contained within this application is true and correct to the best of his or her knowledge. I acknowledge that providing false or fraudulent documentation in order to receive Lifeline benefits is punishable by law and may result in being barred from the program.

I understand that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment.

I have provided documentation of eligibility.

I understand that I and my household can only have one Lifeline-supported telephone service. AmeriMex has explained the one-per household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government.

I attest to the best of my knowledge that I and no one else in my household is receiving a Lifeline supported service from any other land or wireless company such as Safelink, Assurance, or Reachout Wireless.

I understand my AmeriMex Wireless Lifeline service is non-transferrable. I may not transfer my service to any individual, including another eligible low-income consumer.

I will notify AmeriMex Wireless within thirty (30) days of moving.

I will notify AmeriMex Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:

1. My annual household exceeds 135% FPG.
2. If any member of my household, including myself, is receiving more than one Lifeline supported service.
3. I no longer satisfy the criteria for receiving Lifeline support.

AmeriMex Wireless has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it

will result in de-enrollment and termination of my AmeriMex Wireless Lifeline service.

Moreover, the application form will require applicants to provide, in addition to any change in eligibility status referenced above, any changes in personal information to the ETC within 30 days. Finally, the application form will also include an acknowledgement and consent section, written in clear, easily understandable language that indicates that in order to prevent the provision of duplicate services and ensure the proper administration of the Lifeline program certain subscriber information, including a subscriber's full name, residential address, date of birth, the last four digits of the social security number, the telephone number associated with the Lifeline service, dates of Lifeline service initiation and termination (if applicable), and the subscriber's basis for qualification for participation in the Lifeline program (i.e., the name of the state or federal program or an indication that the subscriber's income is at or below 135% FPG), will be transmitted to the Lifeline program administrator (currently the Universal Service Administrative Company (USAC)), and that failure to provide such consent will result in the denial of Lifeline benefits. AmeriMex will update its customer records and all associated state and national databases within 10 business days of notification that the customer has changed addresses.

As disclosed below, and as part of submitting its FCC Form 497 request for Lifeline reimbursement, AmeriMex, will process and validate its subscribers regularly and confirm usage (either monthly or quarterly) in order to prevent: (1) Duplicate Same-Month Lifeline Subsidies ("Double Dip," i.e., any household that is already receiving a Lifeline subsidy from AmeriMex will be automatically prevented from receiving a second lifeline subsidy in that same month); and (2) Inactive lines receiving subsidy (i.e., since AmeriMex does not issue monthly bills, it

will have systems in place to determine if lines have been inactive for more than 60 days to avoid seeking and receiving subsidies for active lines).

As mentioned above, AmeriMex provides several points of contact for consumer interaction. In retail settings, consumers will interact with one or more of AmeriMex's Lifeline trained agents or representatives (collectively the "AAR"). The AAR will provide the applicant with printed information describing AmeriMex's Lifeline program, including eligibility requirements and enrollment instructions. The AAR will also verbally explain the Lifeline benefit (i.e. a non-transferable government benefit, limited to one-per-household) and the qualification (income or program based), documentation (i.e. government issued identification, address, pay stubs, tax returns, benefit statements etc.) and certification and recertification requirements (i.e. penalty of perjury, head of household etc.) of the Lifeline program. Once the AAR has determined that the applicant is a candidate for Lifeline service, the applicant will be asked to complete the Lifeline application. The AAR will review the application and all supporting documentation. The AAR will confirm (via review of AmeriMex's existing customer database) if the applicant or any other individual at the stated address is currently receiving Lifeline service from AmeriMex.<sup>15</sup> The AAR will also review all available federal or state databases to determine if the applicant is receiving a Lifeline benefit from another provider. If the applicant is not currently receiving a Lifeline benefit, the application will be approved, sent to AmeriMex's customer service department for inclusion in all internal and external (federal and state) databases within 10 days, if applicable, and the applicant will be provided with a

---

<sup>15</sup> As indicated above, AmeriMex will also crosscheck addresses against any other providers serviced by CGM, LLC. If the AAR determines that another individual is receiving Lifeline benefits at the applicant's address, he or she will be provided with an opportunity to certify that more than one household resides at that address and that those individuals are part of a separate household. *Order* at ¶77. Pursuant to the *Order*, USAC will provide the requisite document on which the applicant will attest to multiple households.

handset. The AAR will, using the provided handset, connect the applicant to an AmeriMex customer service representative (“ACSR”) who will review the customer account information with the applicant, verifying their personal information, basis for qualification and presentation of proper documentation, and then guide the customer through the activation of the handset and completion of the initial outgoing call.<sup>16</sup> To guarantee accuracy in storing primary addresses associated with customers receiving Lifeline service, AmeriMex will record in its information database (or a national database, when available) the subscriber’s address as recognized by the United States Postal Service.

Customers who do not complete the application process in person must return the signed application and supporting documentation to the Company by mail, fax, email or other electronic transmission in order to qualify and initiate service. The Company intends to accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws and may verify signatures via interactive voice response systems (“IVR”). Processing of consumers’ applications, including review of all application forms and relevant documentation, will be performed under AmeriMex’s supervision by personnel experienced in the administration of the Lifeline program. AmeriMex will ensure that all required documentation is taken care of properly by using state-specific compliance checklists.

---

<sup>16</sup> The customer contact between the ACSR and the applicant at the activation phase also satisfies the “deal directly” obligation established by the Commission in the Tracfone Order. *See Federal-State Joint Board on Universal Service, Petition of Tracfone Wireless, Inc. for Forbearance from 47 U.S.C. Section 214(e)(1)(A) and 47 C.F.R. Section 54.201(i)*, 20 FCC Rcd 15095, 15104 (2005). Additionally, this contact also provides AmeriMex with an opportunity to reaffirm the applicant’s qualification *prior to seeking reimbursement for Lifeline funds on its FCC Forms 497.*



Notwithstanding the foregoing with respect to program or income eligibility, for states that require AmeriMex to enroll subscribers identified by the state or as eligible in a state or federal database, AmeriMex may continue to rely on the state or federal identification or database, if applicable. As mentioned above, when possible, AmeriMex will access a state or federal database to make determinations about customer eligibility. As part of the process, the Company will note in its records the date of review and what data was relied upon to confirm the customer's eligibility for Lifeline. Where a state agency or third-party administrator is responsible for the initial determination of eligibility, AmeriMex will rely on the state identification or database and maintain a record of the date of review.

Alternatively, the application process for applying for a Lifeline benefit via telephone is similar to the retail setting described above. Applicants will be verbally informed by an ACSR of the qualification, documentation and certification requirements for the Lifeline benefit. Applicants may also be directed to the Company's website for additional information. The ACSR will employ a script similar to that provided hereto as Attachment C. The ACSR will determine, based on the applicant's responses, if they qualify for the Lifeline benefit. The conversation between the ACSR and the applicant, specifically the applicant's responses to the certification statements, may, in some instances, be recorded, through the use of an IVR system. If the applicant qualifies for the Lifeline benefit, they will be obligated, as necessary, to provide (via facsimile or U.S. mail) the supporting documentation prior to final approval for Lifeline service. Upon final approval, a handset will be mailed to the applicant's residential address on record and will require signature at delivery. The applicant's service will be activated upon the completion of the initial outbound call to AmeriMex's customer service department. AmeriMex



will not seek reimbursement until a phone has been activated. In the event the applicant does not qualify, the ACSR will explain the reason for denial of service.

Finally, the online application process requires an applicant to review the qualification, documentation and certification requirements as they move through progressive screens on the Company's website. The website will provide in clearly written and easily distinguishable language all the qualification and documentation requirements and mandatory certifications outlined in the *Order*, including but not limited to, that Lifeline is a non-transferable government benefit, limited to one-per-household, with household clearly defined, requires supporting documentation and ongoing recertification obligations and is subject to penalties and imprisonment for fraud. Similar to the telephone application process, the online applicant will be required to separately submit supporting documentation to the Company prior to final approval of Lifeline service and the receipt of a handset.

**D. Annual Verification Procedures**

As required by the Commission's *Order*, AmeriMex will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from AmeriMex, and to the best of his or her knowledge, no one else at the subscriber's household is receiving a Lifeline supported service. Pursuant to the *Order*, AmeriMex will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report those results to USAC by January 31, 2013.

Participating Lifeline consumers will be notified prior to their service anniversary date that they *must* confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on

record with AmeriMex. The Company may also elect to notify customers in advance of their anniversary date via a free text message.

The notification will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact AmeriMex to complete verification. The text message notice will include a brief description, including a statement that additional action is required by the customer. Customers will have 30 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from AmeriMex, and return the form to AmeriMex by mail. Failure to respond to the notice and its obligation to certify the consumers continued eligibility will result in termination of their Lifeline service. The Company will notify subscribers in writing of service termination for not responding to the annual certification within 30 days. Anyone who does not respond within 30 days, demonstrating that his or her Lifeline service should not be terminated, will otherwise be de-enrolled within five business days after the expiration of the 30-day period. Consumers that wish to de-enroll from the Lifeline program can visit a retail location or contact AmeriMex's customer service department via telephone.

In the future, certification may also be obtained through an IVR system or a text message. In states where a state agency or third party has implemented a database that carriers may query to re-certify eligibility, the Company will query the database and maintain a record of what data was used to re-certify eligibility and the date of re-certification. At this time, AmeriMex's customers may complete the verification process by mail only. The Company may offer additional options, such as IVR and web-based methods, in the future.

#### **IV. 911 and E/911 Access**

AmeriMex will provide all of its Lifeline subscribers with access to emergency calling services at the time the Lifeline service is initiated. Such 911 and E911 access will be available from AmeriMex handsets regardless of the status of the subscriber account or the airtime balance associated with the handset. Under current practice, access to such emergency services is still made available to subscribers whether their account is active, suspended, terminated, or has reached the minimum required airtime balance.

**V. E911-Compliant Handsets**

AmeriMex will ensure that all handsets shipped to Lifeline service subscribers will be E911-compliant. All of the Company's mobile devices are 911 and E911-compliant. In the event that an existing subscriber has a noncompliant handset, the Company will immediately replace such device with an E911-compliant handset at no additional charge to the subscriber.

**VI. Uniform Marketing Materials**

AmeriMex will ensure that all of its marketing materials, including "email, web, and social networking media and outdoor signage", consistently disclose or display, "in clear, easily understood language in all such marketing materials that the offering is a Lifeline-supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and that the program is limited to one benefit per household, consisting of either wireline or wireless service."<sup>17</sup> Additionally, all marketing materials, as well as the Lifeline application form, will indicate that the Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

---

<sup>17</sup> See Exhibit D.

## **VII. Measures to Prevent Waste, Fraud, and Abuse**

AmeriMex will implement certain procedures in order to deter, identify and remove customers that may be attempting to abuse of the Lifeline program, inadvertently or intentionally.

### **A. Non-usage Policy**

AmeriMex will implement a non-usage policy in which it monitors usage (only, not content) to identify Lifeline customers that have not used their Lifeline service for a period of 60 consecutive days. Upon determination of non-usage, AmeriMex will immediately cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. Once AmeriMex determines that a Lifeline customer has been inactive for 60 days, it will promptly notify the customer that the customer is no longer eligible for AmeriMex's Lifeline service subject to a 30-day grace period during which the customer's account will remain active. If the customer does not respond to AmeriMex's efforts, and the customer remains inactive (fails to send or receive voice calls or text messages, makes a payment or adds minutes to the account), AmeriMex will deactivate the Lifeline services for that customer. In addition, AmeriMex will not seek to recover a Federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

### **B. Customer Education with Respect to Duplicates**

As indicated above, AmeriMex will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as the monthly or quarterly subscriber review undertaken during the preparation of the FCC Form 497. In addition to this ongoing due

diligence, AmeriMex will also review subscriber records in preparation for the Company's annual recertification to USAC.

AmeriMex will ensure that each of its sources presenting Lifeline information, including the call center, customer application form, and website will emphasize the limitation of the "one Lifeline phone per household" restriction (see Exhibit A).

### **C. Cooperation with State and Federal Regulators**

AmeriMex has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Getting customer consent to provide, and providing state commissions (PUC), the FCC or USAC upon request with, data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, AmeriMex agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if AmeriMex's investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that AmeriMex's Lifeline service should be discontinued

such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and Order (Section III, B.).

- AmeriMex agrees to comply with all certification requirements annually and when submitting for reimbursements from USAC.<sup>18</sup>

---

<sup>18</sup> See, for example, *Order* at ¶¶125-28, 398.

**CONCLUSION**

AmeriMex submits that this Compliance Plan fully satisfies the conditions set forth in the Commission's *Order* granting forbearance to the Company. The aforementioned policies and procedures are in place to safeguard against misuse of the Company's Lifeline services, as well as to prevent waste, fraud, and abuse of the Lifeline program. AmeriMex procedures also ensure public safety by ensuring access to 911 and E911 services. Consequently, AmeriMex respectfully requests that the Commission expeditiously approve this Compliance Plan so that AmeriMex may continue providing the benefits of much-needed Lifeline service to qualifying low-income consumers in Georgia and possibly expand to additional states.

Respectfully submitted,

AMERIMEX COMMUNICATIONS CORP.

\_\_\_\_\_  
/s/

Glenn S. Richards  
Pillsbury Winthrop Shaw Pittman LLP  
2300 N Street NW  
Washington D.C. 20037  
(202) 663-8215

Its Counsel

December 6, 2012

**EXHIBIT 3**

**Coverage Area**



<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>
63005	Chesterfield	63061	Luebbering	63126	Saint Louis
63006	Chesterfield	63065	Mapaville	63127	Saint Louis
63010	Arnold	63066	Morse Mill	63128	Saint Louis
63011	Ballwin	63068	New Haven	63129	Saint Louis
63012	Barnhart	63069	Pacific	63130	Saint Louis
63013	Beaufort	63070	Pevely	63131	Saint Louis
63014	Berger	63071	Richwoods	63132	Saint Louis
63015	Catawissa	63072	Robertsville	63133	Saint Louis
63016	Cedar Hill	63073	Saint Albans	63134	Saint Louis
63017	Chesterfield	63074	Saint Ann	63135	Saint Louis
63019	Crystal City	63077	Saint Clair	63136	Saint Louis
63020	De Soto	63079	Stanton	63137	Saint Louis
63021	Ballwin	63080	Sullivan	63138	Saint Louis
63022	Ballwin	63084	Union	63139	Saint Louis
63023	Dittmer	63087	Valles Mines	63140	Saint Louis
63024	Ballwin	63088	Valley Park	63141	Saint Louis
63025	Eureka	63089	Villa Ridge	63143	Saint Louis
63026	Fenton	63090	Washington	63144	Saint Louis
63028	Festus	63091	Rosebud	63145	Saint Louis
63030	Fletcher	63099	Fenton	63146	Saint Louis
63031	Florissant	63101	Saint Louis	63147	Saint Louis
63032	Florissant	63102	Saint Louis	63150	Saint Louis
63033	Florissant	63103	Saint Louis	63151	Saint Louis
63034	Florissant	63104	Saint Louis	63155	Saint Louis
63036	French Village	63105	Saint Louis	63156	Saint Louis
63037	Gerald	63106	Saint Louis	63157	Saint Louis
63038	Wildwood	63107	Saint Louis	63158	Saint Louis
63039	Gray Summit	63108	Saint Louis	63160	Saint Louis
63040	Wildwood	63109	Saint Louis	63163	Saint Louis
63041	Grubville	63110	Saint Louis	63164	Saint Louis
63042	Hazelwood	63111	Saint Louis	63166	Saint Louis
63043	Maryland Heights	63112	Saint Louis	63167	Saint Louis
63044	Bridgeton	63113	Saint Louis	63169	Saint Louis
63045	Earth City	63114	Saint Louis	63171	Saint Louis
63047	Hematite	63115	Saint Louis	63177	Saint Louis
63048	Herculaneum	63116	Saint Louis	63178	Saint Louis
63049	High Ridge	63117	Saint Louis	63179	Saint Louis
63050	Hillsboro	63118	Saint Louis	63180	Saint Louis
63051	House Springs	63119	Saint Louis	63182	Saint Louis
63052	Imperial	63120	Saint Louis	63188	Saint Louis
63053	Kimmswick	63121	Saint Louis	63195	Saint Louis
63055	Labadie	63122	Saint Louis	63197	Saint Louis
63056	Leslie	63123	Saint Louis	63199	Saint Louis
63057	Liguori	63124	Saint Louis	63301	Saint Charles
63060	Lonedell	63125	Saint Louis	63302	Saint Charles

Zip	City	Zip	City	Zip	City
63303	Saint Charles	63387	Whiteside	63501	Kirksville
63304	Saint Charles	63388	Williamsburg	63530	Atlanta
63330	Annada	63389	Winfield	63531	Baring
63332	Augusta	63390	Wright City	63532	Bevier
63333	Bellflower	63401	Hannibal	63533	Brashear
63334	Bowling Green	63430	Alexandria	63534	Callao
63336	Clarksville	63431	Anabel	63535	Coatsville
63338	Cottleville	63432	Arbela	63536	Downing
63339	Curryville	63433	Ashburn	63537	Edina
63341	Defiance	63434	Bethel	63538	Elmer
63342	Dutzow	63435	Canton	63539	Ethel
63343	Elsberry	63436	Center	63540	Gibbs
63344	Eolia	63437	Clarence	63541	Glenwood
63345	Farber	63438	Durham	63543	Gorin
63346	Flinthill	63439	Emden	63544	Green Castle
63347	Foley	63440	Ewing	63545	Green City
63348	Foristell	63441	Frankford	63546	Greentop
63349	Hawk Point	63443	Hunnewell	63547	Hurdland
63350	High Hill	63445	Kahoka	63548	Lancaster
63351	Jonesburg	63446	Knox City	63549	La Plata
63352	Laddonia	63447	La Belle	63551	Livonia
63353	Louisiana	63448	La Grange	63552	Macon
63357	Marthasville	63450	Lentner	63555	Memphis
63359	Middletown	63451	Leonard	63556	Milan
63361	Montgomery City	63452	Lewistown	63557	New Boston
63362	Moscow Mills	63453	Luray	63558	New Cambria
63363	New Florence	63454	Maywood	63559	Novinger
63365	New Melle	63456	Monroe City	63560	Pollock
63366	O Fallon	63457	Monticello	63561	Queen City
63367	Lake Saint Louis	63458	Newark	63563	Rutledge
63368	O Fallon	63459	New London	63565	Unionville
63369	Old Monroe	63460	Novelty	63566	Winigan
63370	Olney	63461	Palmyra	63567	Worthington
63373	Portage Des Sioux	63462	Perry	63601	Park Hills
63376	Saint Peters	63463	Philadelphia	63620	Annapolis
63377	Silex	63464	Plevna	63621	Arcadia
63378	Treloar	63465	Revere	63622	Belgrade
63379	Troy	63466	Saint Patrick	63623	Bellevue
63380	Truesdale	63467	Saverton	63624	Bismarck
63381	Truxton	63468	Shelbina	63625	Black
63382	Vandalia	63469	Shelbyville	63626	Blackwell
63383	Warrenton	63471	Taylor	63627	Bloomsdale
63384	Wellsville	63472	Wayland	63628	Bonne Terre
63385	Wentzville	63473	Williamstown	63629	Bunker
63386	West Alton	63474	Wyaconda	63630	Cadet

<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>
63631	Caledonia	63767	Morley	63862	Lilbourn
63636	Des Arc	63769	Oak Ridge	63863	Malden
63637	Doe Run	63770	Old Appleton	63866	Marston
63638	Ellington	63771	Oran	63867	Matthews
63640	Farmington	63774	Perkins	63868	Morehouse
63645	Fredericktown	63775	Perryville	63869	New Madrid
63648	Irondale	63776	Mc Bride	63870	Parma
63650	Ironton	63779	Pocahontas	63873	Portageville
63651	Knob Lick	63780	Scott City	63874	Risco
63653	Leadwood	63781	Sedgewickville	63875	Rives
63654	Lesterville	63782	Sturdivant	63876	Senath
63655	Marquand	63783	Uniontown	63877	Steele
63656	Middle Brook	63784	Vanduser	63878	Tallapoosa
63660	Mineral Point	63785	Whitewater	63879	Wardell
63662	Patton	63787	Zalma	63880	Whiteoak
63664	Potosi	63801	Sikeston	63881	Wolf Island
63665	Redford	63820	Anniston	63882	Wyatt
63670	Sainte Genevieve	63821	Arbyrd	63901	Poplar Bluff
63673	Saint Mary	63822	Bernie	63902	Poplar Bluff
63675	Vulcan	63823	Bertrand	63931	Briar
63701	Cape Girardeau	63824	Blodgett	63932	Broseley
63702	Cape Girardeau	63825	Bloomfield	63933	Campbell
63703	Cape Girardeau	63826	Braggadocio	63934	Clubb
63730	Advance	63827	Bragg City	63935	Doniphan
63732	Altenburg	63828	Canalou	63936	Dudley
63735	Bell City	63829	Cardwell	63937	Ellsinore
63736	Benton	63830	Caruthersville	63938	Fagus
63738	Brownwood	63833	Catron	63939	Fairdealing
63739	Burfordville	63834	Charleston	63940	Fisk
63740	Chaffee	63837	Clarkton	63941	Fremont
63742	Commerce	63839	Cooter	63942	Gatewood
63743	Daisy	63840	Deering	63943	Grandin
63744	Delta	63841	Dexter	63944	Greenville
63745	Dutchtown	63845	East Prairie	63945	Harviell
63747	Friedheim	63846	Essex	63950	Lodi
63748	Frohna	63847	Gibson	63951	Lowndes
63750	Gipsy	63848	Gideon	63952	Mill Spring
63751	Glenallen	63849	Gobler	63953	Naylor
63752	Gordonville	63850	Grayridge	63954	Neelyville
63755	Jackson	63851	Hayti	63955	Oxly
63758	Kelso	63852	Holcomb	63956	Patterson
63760	Leopold	63853	Holland	63957	Piedmont
63763	Mc Gee	63855	Hornersville	63960	Puxico
63764	Marble Hill	63857	Kennett	63961	Qulin
63766	Millersville	63860	Kewanee	63962	Rombauer

Zip	City	Zip	City	Zip	City
63964	Silva	64068	Liberty	64124	Kansas City
63965	Van Buren	64069	Liberty	64125	Kansas City
63966	Wappapello	64070	Lone Jack	64126	Kansas City
63967	Williamsville	64071	Mayview	64127	Kansas City
64001	Alma	64072	Missouri City	64128	Kansas City
64002	Lees Summit	64073	Mosby	64129	Kansas City
64011	Bates City	64074	Napoleon	64130	Kansas City
64012	Belton	64075	Oak Grove	64131	Kansas City
64013	Blue Springs	64076	Odessa	64132	Kansas City
64014	Blue Springs	64077	Orrick	64133	Kansas City
64015	Blue Springs	64078	Peculiar	64134	Kansas City
64016	Buckner	64079	Platte City	64136	Kansas City
64017	Camden	64080	Pleasant Hill	64137	Kansas City
64018	Camden Point	64081	Lees Summit	64138	Kansas City
64019	Centerview	64082	Lees Summit	64139	Kansas City
64020	Concordia	64083	Raymore	64141	Kansas City
64021	Corder	64084	Rayville	64144	Kansas City
64022	Dover	64085	Richmond	64145	Kansas City
64024	Excelsior Springs	64086	Lees Summit	64146	Kansas City
64028	Farley	64088	Sibley	64147	Kansas City
64029	Grain Valley	64089	Smithville	64148	Kansas City
64030	Grandview	64090	Strasburg	64149	Kansas City
64034	Greenwood	64092	Waldron	64150	Riverside
64035	Hardin	64093	Warrensburg	64151	Kansas City
64036	Henrietta	64096	Waverly	64152	Kansas City
64037	Higginsville	64097	Wellington	64153	Kansas City
64040	Holden	64098	Weston	64154	Kansas City
64048	Holt	64101	Kansas City	64155	Kansas City
64050	Independence	64102	Kansas City	64156	Kansas City
64051	Independence	64105	Kansas City	64157	Kansas City
64052	Independence	64106	Kansas City	64158	Kansas City
64053	Independence	64108	Kansas City	64161	Kansas City
64054	Independence	64109	Kansas City	64162	Kansas City
64055	Independence	64110	Kansas City	64163	Kansas City
64056	Independence	64111	Kansas City	64164	Kansas City
64057	Independence	64112	Kansas City	64165	Kansas City
64058	Independence	64113	Kansas City	64166	Kansas City
64060	Kearney	64114	Kansas City	64167	Kansas City
64061	Kingsville	64116	Kansas City	64168	Kansas City
64062	Lawson	64117	Kansas City	64170	Kansas City
64063	Lees Summit	64118	Kansas City	64171	Kansas City
64064	Lees Summit	64119	Kansas City	64179	Kansas City
64065	Lees Summit	64120	Kansas City	64180	Kansas City
64066	Levasy	64121	Kansas City	64184	Kansas City
64067	Lexington	64123	Kansas City	64187	Kansas City

<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>
64188	Kansas City	64461	Hopkins	64624	Braymer
64190	Kansas City	64463	King City	64625	Breckenridge
64191	Kansas City	64465	Lathrop	64628	Brookfield
64195	Kansas City	64466	Maitland	64630	Browning
64196	Kansas City	64467	Martinsville	64631	Bucklin
64197	Kansas City	64468	Maryville	64632	Cainsville
64198	Kansas City	64469	Maysville	64633	Carrollton
64199	Kansas City	64470	Mound City	64635	Chula
64401	Agency	64471	New Hampton	64636	Coffey
64402	Albany	64473	Oregon	64637	Cowgill
64420	Allendale	64474	Osborn	64638	Dawn
64421	Amazonia	64475	Parnell	64639	De Witt
64422	Amity	64476	Pickering	64640	Gallatin
64423	Barnard	64477	Plattsburg	64641	Galt
64424	Bethany	64479	Ravenwood	64642	Gilman City
64426	Blythedale	64480	Rea	64643	Hale
64427	Bolckow	64481	Ridgeway	64644	Hamilton
64428	Burlington Junction	64482	Rock Port	64645	Harris
64429	Cameron	64483	Rosendale	64646	Humphreys
64430	Clarksdale	64484	Rushville	64647	Jameson
64431	Clearmont	64485	Savannah	64648	Jamesport
64432	Clyde	64486	Sheridan	64649	Kidder
64433	Conception	64487	Skidmore	64650	Kingston
64434	Conception Junction	64489	Stanberry	64651	Laclede
64436	Cosby	64490	Stewartsville	64652	Laredo
64437	Craig	64491	Tarkio	64653	Linneus
64438	Darlington	64492	Trimble	64654	Lock Springs
64439	Dearborn	64493	Turney	64655	Lucerne
64440	De Kalb	64494	Union Star	64656	Ludlow
64441	Denver	64496	Watson	64657	Mc Fall
64442	Eagleville	64497	Weatherby	64658	Marceline
64443	Easton	64498	Westboro	64659	Meadville
64444	Edgerton	64499	Worth	64660	Mendon
64445	Elmo	64501	Saint Joseph	64661	Mercer
64446	Fairfax	64502	Saint Joseph	64664	Mooresville
64448	Faucett	64503	Saint Joseph	64667	Newtown
64449	Fillmore	64504	Saint Joseph	64668	Norborne
64451	Forest City	64505	Saint Joseph	64670	Pattonsburg
64453	Gentry	64506	Saint Joseph	64671	Polo
64454	Gower	64507	Saint Joseph	64672	Powersville
64455	Graham	64508	Saint Joseph	64673	Princeton
64456	Grant City	64601	Chillicothe	64674	Purdin
64457	Guilford	64620	Altamont	64676	Rothville
64458	Hatfield	64622	Bogard	64679	Spickard
64459	Helena	64623	Bosworth	64680	Stet

<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>
64681	Sumner	64778	Richards	65001	Argyle
64682	Tina	64779	Rich Hill	65010	Ashland
64683	Trenton	64780	Rockville	65011	Barnett
64686	Utica	64781	Roscoe	65013	Belle
64688	Wheeling	64783	Schell City	65014	Bland
64689	Winston	64784	Sheldon	65016	Bonnots Mill
64701	Harrisonville	64788	Urich	65017	Brumley
64720	Adrian	64790	Walker	65018	California
64722	Amoret	64801	Joplin	65020	Camdenton
64723	Amsterdam	64802	Joplin	65023	Centertown
64724	Appleton City	64803	Joplin	65024	Chamois
64725	Archie	64804	Joplin	65025	Clarksburg
64726	Blairstown	64830	Alba	65026	Eldon
64728	Bronaugh	64831	Anderson	65032	Eugene
64730	Butler	64832	Asbury	65034	Fortuna
64733	Chilhowee	64833	Avilla	65035	Freeburg
64734	Cleveland	64834	Carl Junction	65036	Gasconade
64735	Clinton	64835	Carterville	65037	Gravois Mills
64738	Collins	64836	Carthage	65038	Laurie
64739	Creighton	64840	Diamond	65039	Hartsburg
64740	Deepwater	64841	Duenweg	65040	Henley
64741	Deerfield	64842	Fairview	65041	Hermann
64742	Drexel	64843	Goodman	65042	High Point
64743	East Lynne	64844	Granby	65043	Holts Summit
64744	El Dorado Springs	64847	Lanagan	65046	Jamestown
64745	Foster	64848	La Russell	65047	Kaiser
64746	Freeman	64850	Neosho	65048	Koeltztown
64747	Garden City	64853	Newtonia	65049	Lake Ozark
64748	Golden City	64854	Noel	65050	Latham
64750	Harwood	64855	Oronogo	65051	Linn
64752	Hume	64856	Pineville	65052	Linn Creek
64755	Jasper	64857	Purcell	65053	Lohman
64756	Jerico Springs	64859	Reeds	65054	Loose Creek
64759	Lamar	64861	Rocky Comfort	65055	Mc Girk
64761	Leeton	64862	Sarcoxie	65058	Meta
64762	Liberal	64863	South West City	65059	Mokane
64763	Lowry City	64864	Saginaw	65061	Morrison
64765	Metz	64865	Seneca	65062	Mount Sterling
64766	Milford	64866	Stark City	65063	New Bloomfield
64767	Milo	64867	Stella	65064	Olean
64769	Mindenmines	64868	Tiff City	65065	Osage Beach
64770	Montrose	64870	Webb City	65066	Owensville
64771	Moundville	64873	Wentworth	65067	Portland
64772	Nevada	64874	Wheaton	65068	Prairie Home
64776	Osceola	64999	Kansas City	65069	Rhineland

Zip	City	Zip	City	Zip	City
65072	Rocky Mount	65247	Excello	65333	Houstonia
65074	Russellville	65248	Fayette	65334	Hughesville
65075	Saint Elizabeth	65250	Franklin	65335	Ionia
65076	Saint Thomas	65251	Fulton	65336	Knob Noster
65077	Steedman	65254	Glasgow	65337	La Monte
65078	Stover	65255	Hallsville	65338	Lincoln
65079	Sunrise Beach	65256	Harrisburg	65339	Malta Bend
65080	Tebbetts	65257	Higbee	65340	Marshall
65081	Tipton	65258	Holliday	65344	Miami
65082	Tuscumbia	65259	Huntsville	65345	Mora
65083	Ulman	65260	Jacksonville	65347	Nelson
65084	Versailles	65261	Keytesville	65348	Otterville
65085	Westphalia	65262	Kingdom City	65349	Slater
65101	Jefferson City	65263	Madison	65350	Smithton
65102	Jefferson City	65264	Martinsburg	65351	Sweet Springs
65103	Jefferson City	65265	Mexico	65354	Syracuse
65104	Jefferson City	65270	Moberly	65355	Warsaw
65105	Jefferson City	65274	New Franklin	65360	Windsor
65106	Jefferson City	65275	Paris	65401	Rolla
65107	Jefferson City	65276	Pilot Grove	65402	Rolla
65108	Jefferson City	65278	Renick	65409	Rolla
65109	Jefferson City	65279	Rocheport	65436	Beulah
65110	Jefferson City	65280	Rush Hill	65438	Birch Tree
65111	Jefferson City	65281	Salisbury	65439	Bixby
65201	Columbia	65282	Santa Fe	65440	Boss
65202	Columbia	65283	Stoutsville	65441	Bourbon
65203	Columbia	65284	Sturgeon	65443	Brinktown
65205	Columbia	65285	Thompson	65444	Bucyrus
65211	Columbia	65286	Triplett	65446	Cherryville
65212	Columbia	65287	Wooldridge	65449	Cook Sta
65215	Columbia	65299	Columbia	65452	Crocker
65216	Columbia	65301	Sedalia	65453	Cuba
65217	Columbia	65302	Sedalia	65456	Davisville
65218	Columbia	65305	Whiteman Air Force Base	65457	Devils Elbow
65230	Armstrong	65320	Arrow Rock	65459	Dixon
65231	Auxvasse	65321	Blackburn	65461	Duke
65232	Benton City	65322	Blackwater	65462	Edgar Springs
65233	Boonville	65323	Calhoun	65463	Eldridge
65236	Brunswick	65324	Climax Springs	65464	Elk Creek
65237	Bunceton	65325	Cole Camp	65466	Eminence
65239	Cairo	65326	Edwards	65468	Eunice
65240	Centralia	65327	Emma	65470	Falcon
65243	Clark	65329	Florence	65473	Fort Leonard Wood
65244	Clifton Hill	65330	Gilliam	65479	Hartshorn
65246	Dalton	65332	Green Ridge	65483	Houston

<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>
65484	Huggins	65612	Bois D Arc	65664	Halltown
65486	Iberia	65613	Bolivar	65666	Hardenville
65501	Jadwin	65614	Bradleyville	65667	Hartville
65529	Jerome	65615	Branson	65668	Hermitage
65532	Lake Spring	65616	Branson	65669	Highlandville
65534	Laquey	65617	Brighton	65672	Hollister
65535	Leasburg	65618	Brixey	65673	Hollister
65536	Lebanon	65619	Brookline	65674	Humansville
65541	Lenox	65620	Bruner	65676	Isabella
65542	Licking	65622	Buffalo	65679	Kirbyville
65543	Lynchburg	65623	Butterfield	65680	Kissee Mills
65546	Montier	65624	Cape Fair	65681	Lampe
65548	Mountain View	65625	Cassville	65682	Lockwood
65550	Newburg	65626	Caulfield	65685	Louisburg
65552	Plato	65627	Cedarcreek	65686	Kimberling City
65555	Raymondville	65629	Chadwick	65688	Brandsville
65556	Richland	65630	Chestnutridge	65689	Cabool
65557	Roby	65631	Clever	65690	Couch
65559	Saint James	65632	Conway	65692	Koshkonong
65560	Salem	65633	Crane	65702	Macomb
65564	Solo	65634	Cross Timbers	65704	Mansfield
65565	Steelville	65635	Dadeville	65705	Marionville
65566	Viburnum	65636	Diggins	65706	Marshfield
65567	Stoutland	65637	Dora	65707	Miller
65570	Success	65638	Drury	65708	Monett
65571	Summersville	65640	Dunnegan	65710	Morrisville
65580	Vichy	65641	Eagle Rock	65711	Mountain Grove
65582	Vienna	65644	Elkland	65712	Mount Vernon
65583	Waynesville	65645	Morrisville	65713	Niangua
65584	Saint Robert	65646	Everton	65714	Nixa
65586	Wesco	65647	Exeter	65715	Noble
65588	Winona	65648	Fair Grove	65717	Norwood
65589	Yukon	65649	Fair Play	65720	Oldfield
65590	Long Lane	65650	Flemington	65721	Ozark
65591	Montreal	65652	Fordland	65722	Phillipsburg
65601	Aldrich	65653	Forsyth	65723	Pierce City
65603	Arcola	65654	Freistatt	65724	Pittsburg
65604	Ash Grove	65655	Gainesville	65725	Pleasant Hope
65605	Aurora	65656	Galena	65726	Point Lookout
65606	Alton	65657	Garrison	65727	Polk
65607	Caplinger Mills	65658	Golden	65728	Ponce De Leon
65608	Ava	65660	Graff	65729	Pontiac
65609	Bakersfield	65661	Greenfield	65730	Powell
65610	Billings	65662	Grovespring	65731	Powersite
65611	Blue Eye	65663	Half Way	65732	Preston



<b>Zip</b>	<b>City</b>	<b>Zip</b>	<b>City</b>
65733	Protem	65790	Pottersville
65734	Purdy	65791	Thayer
65735	Quincy	65793	Willow Springs
65737	Reeds Spring	65801	Springfield
65738	Republic	65802	Springfield
65739	Ridgedale	65803	Springfield
65740	Rockaway Beach	65804	Springfield
65742	Rogersville	65805	Springfield
65744	Rueter	65806	Springfield
65745	Seligman	65807	Springfield
65746	Seymour	65808	Springfield
65747	Shell Knob	65809	Springfield
65752	South Greenfield	65810	Springfield
65753	Sparta	65814	Springfield
65754	Spokane	65817	Springfield
65755	Squires	65890	Springfield
65756	Stotts City	65897	Springfield
65757	Strafford	65898	Springfield
65759	Taneyville	65899	Springfield
65760	Tecumseh		
65761	Theodosia		
65762	Thornfield		
65764	Tunas		
65765	Turners		
65766	Udall		
65767	Urbana		
65768	Vanzant		
65769	Verona		
65770	Walnut Grove		
65771	Walnut Shade		
65772	Washburn		
65773	Wasola		
65774	Weaubleau		
65775	West Plains		
65777	Moody		
65778	Myrtle		
65779	Wheatland		
65781	Willard		
65783	Windyville		
65784	Zanoni		
65785	Stockton		
65786	Macks Creek		
65787	Roach		
65788	Peace Valley		
65789	Pomona		

**EXHIBIT 4**

**Key Management Bios**

## RESUME

Donald L. Aldridge

### WORK HISTORY

**1998 – 2020:** Founder and Chairman of AmeriMex Communications Corp. dba SafetyNet Wireless. AmeriMex is a Georgia licensed Competitive Local Exchange Carrier (CLEC) and also has a 214 license from the FCC. AmeriMex has been designated as an Eligible Telecommunications Carrier (ETC) by eight states and provides government subsidized wireless telephone service under the SafetyNet brand to low income residents within those states.

**1993 – 1998:** Partner with Tatum CFO Partners. Tatum provided financial advisory services to small and medium sized firms in the Southeastern USA.

**1990 – 1993:** CFO of Southern Services Inc. (SSI). SSI was an Atlanta based janitorial service company that primarily served high rise office towers in the metro Atlanta area.

**1985 – 1990:** Controller of Oxford Services Inc. Oxford provided janitorial and landscape services to clients throughout the Southeastern USA.

**1983 – 1985:** Controller of Prystup Packaging Products Inc.

**1981 – 1983;** Accountant with Deloitte & Touche, CPA Firm

### EDUCATION

MBA – Virginia Tech 1981

B.S. Accounting – Bob Jones University 1980

## **Stephen D. Klein**

Since May of 2013 Mr. Klein has been the President of AmeriMex Communications Corp, dba SafetyNet Wireless, a wireless Eligible Telecommunications Carrier (ETC) who is an approved ETC in 8 states and provides LifeLine wireless services low income consumers who qualify for the program.

In addition to being president of SafetyNet Wireless Mr. Klein is the president of Expert Communications Marketing, Inc. dba Expert Choice Marketing. Mr. Klein founded this company in 2007 which provided long distance and internet services to credit challenged consumers. Upon selling American Dial Tone (a CLEC) his primary business in 2009, Mr. Klein shifted the focus of Expert to become a marketing company specializing in offering telecommunications and energy services to low income consumers.

Prior to Expert Choice Marketing, Mr. Klein was the founder and CEO of American Dial Tone from 1998 to 2009, a competitive local exchange carrier (CLEC) located in Tampa Bay FL, which provided local telephone service to the credit challenged market in multiple states. Under Steve's supervision American Dial Tone developed a superior back office, billing and ordering system which gave the company a competitive edge in the pre-paid CLEC industry. American Dial Tone was one of the first in their industry to electronically bond with Verizon and BellSouth. ADT enjoyed one of the lowest overhead costs per connected customer in the industry. ADT was proud of the fact that they had excellent relationships with the ILEC's and were current on all of their bills. ADT was the second ETC in the state of Florida and was proud to provide lifeline services in the state. Being one of the first ETC's in the industry ADT quickly noticed that there was potential for waste, fraud and abuse within the system. ADT developed its in house systems to prevent the company from giving service to customers who were not entitled to receive funds and to prevent claiming funds from the USAC that had already been collected from the ILEC.

Mr. Klein has been of the board of the National Lifeline Association (NaLA) since 2003 and had served as president for two years.

Prior to his founding American Dial Tone Mr. Klein was President and CEO of One Stop Auto Parts, Inc., a Florida based retail auto parts chain of 42 stores with a 50,000 S.F. distribution facility. The company had approximately 300 employees and 32 million in sales. Steve joined the company in 1981 with 3 stores and remained until 1998 playing a significant role in developing the organization. Prior to becoming President, he occupied positions in Merchandising, Management and Information Systems, Distribution and became the Chief Financial Officer.

Steve has a bachelor's degree in business from Michigan State University and has done post graduate and graduate work at Western Michigan University, Ohio State University and Tampa College.

He was a long standing member of The Executive Committee (TEC) which is an International Organization of over 13,000 CEO's. TEC members meet once a month for a full day with a groups of 10 to 15 CEOs from non-competing business industries to

discuss business strategies, best practices, leadership styles, and other leadership training topics to enhance decision making and business performance. Additionally there is monthly one-to-one coaching with their Chair who offers executive insights, business advice, accountability, and effective leadership help and support. On average, TEC companies are better run and grow their revenues, at more than twice the percentage growth rate than non-TEC companies.

Mr. Klein, his wife Esther and daughter Giulianna currently reside in Safety Harbor FL.

## **EXHIBIT 5**

### **Proposed Lifeline Offering**

#### **SAFETYNET WIRELESS LIFELINE OFFERING**

##### **350 Minutes & 3 GB Data**

350 anytime minutes per month  
Unlimited text messaging  
3 GB data per month

Net cost to Lifeline customer: **\$0**

##### **ADDITIONAL AIRTIME**

Available for purchase at [www.SafetyNetwireless.com](http://www.SafetyNetwireless.com)

##### **All packages include:**

- Free calls to SafetyNet Customer Service
- 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

**Exhibit 6**

**Letter to United States Senators**



April 9, 2020

Senator Ron Wyden  
Senator Kirsten Gillibrand  
Senator Richard J. Durbin  
Senator Jack Reed  
Senator Richard Blumenthal  
Senator Edward M. Markey  
Senator Mazie Hirono  
Senator Bernard Sanders  
Senator Kamala D. Harris  
Senator Robert Menendez  
Senator Amy Klobuchar

Senator Benjamin L. Cardin  
Senator Cory A. Booker  
Senator Patty Murray  
Senator Jeffrey A. Merkley  
Senator Sherrod Brown  
Senator Tammy Duckworth  
Senator Elizabeth Warren  
Senator Tammy Baldwin  
Senator Chris Van Hollen  
Senator Margaret Wood Hassan  
Senator Jeanne Shaheen

United States Senate  
Washington, DC 20510

Re:	<b>SafetyNet's Response to the COVID-19 Pandemic</b>
-----	--

Dear Senators:

On behalf of AmeriMex Communications Corp dba SafetyNet Wireless I thank you for your letter and applaud your interest in ensuring that our Lifeline subscribers have affordable access to the voice and mobile broadband services necessary to connect to remote learning, tele-health, remote work, essential government services, friends, and family during the COVID-19 crisis and the recovery period to follow.

As a small business, I can tell you that we, too, are grappling with the challenges presented by the unfolding public health and economic crisis. We are doing our best to provide the best Lifeline service that we can provide. Specifically, in response to your letter, we are:

- working with our wholesale network operator partners and we can provide more minutes and as much as 5 GB more of mobile broadband to many of our subscribers for free;
- providing access to hotspot capability on equipped smartphones for free;
- providing reduced cost upgrades to hotspot capable devices for subscribers who do not have them;





- posting and providing clear instructions to subscribers on how to access smartphone hotspot capability;
- we are working with our wholesale partners to explore viable roll-over options; and
- providing access to the 4G networks of our wholesale partners for free.

We have endorsed Chairman Pai's Keeping Americans Connected Pledge and we have worked to ensure that we have the ability to continue providing access to essential Lifeline services during state stay-at-home orders, consistent with social distancing and safety guidelines.

But much more can and should be done. To that end, we endorse and respectfully refer you to the letter submitted to you on April 8, 2020 by the National Lifeline Association (NaLA).

Thank you for your interest and leadership in ensuring that our Lifeline subscribers have access to the communications tools and services needed during COVID-19 emergency and the recovery period to follow. We stand ready to work with you and all stakeholders to make that possible.

Sincerely,

*Stephen D. Klein*

Stephen D Klein

President

**Exhibit 7**

**Secretary of State Authorizations**

# STATE OF MISSOURI



**John R. Ashcroft**  
**Secretary of State**

## CERTIFICATE OF AUTHORITY

WHEREAS,

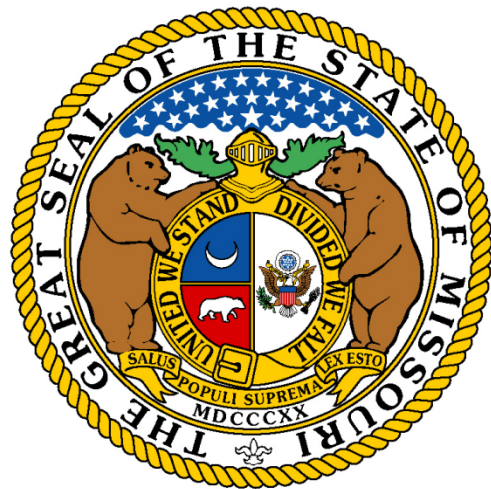
***AMERIMEX COMMUNICATIONS CORP.***  
***F001334592***

has complied with the Missouri General and Business Corporation Law which governs Foreign Corporations; by filing in the office of the Secretary of the State of Missouri authenticated evidence of its incorporation and good standing under the Laws of the State of Georgia.

NOW, THEREFORE, I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that said corporation is from this date duly authorized to transact business in this State, and is entitled to all rights and privileges granted to Foreign Corporations under the General and Business Corporation Law.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 14th day of May, 2020.

  
Secretary of State





Creation, Renewal, Correction and Amendment of Fictitious Name

Jeffrey Matthews

*Owner's Signature or Authorized Signature of Business Entity*

JEFFREY MATTHEWS

*Printed Name*

05/22/2020

*Date*