

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

In the Matter of the Application of)
i-wireless, LLC for Designation as) Case No. _____
an Eligible Telecommunications)
Carrier in the State of Missouri)

**APPLICATION OF I-WIRELESS, LLC
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF MISSOURI**

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request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Missouri residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this application for ETC designation.

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II. I-WIRELESS' UNIVERSAL SERVICE OFFERING

A. Company Overview

i-wireless is a North Carolina Limited Liability Company.⁴ Its principal office is located at 1 Levee Way, Suite 3104, Newport, Kentucky 41071. i-wireless is a reseller of commercial mobile radio service ("CMRS") throughout the United States. i-wireless provides prepaid

⁴ i-wireless was organized in the State of North Carolina on September 7, 2006.

wireless telecommunications services to consumers by using the Sprint Nextel (“Sprint”) network on a wholesale basis to offer nationwide service. i-wireless obtains from Sprint the network infrastructure and wireless transmission facilities to allow i-wireless to operate as a Mobile Virtual Network Operator (“MVNO”).

i-wireless’ prepaid wireless services that are affordable and easy to use are attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. i-wireless offers consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of other, similar MVNOs’ customers, i-wireless anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. i-wireless does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service. i-wireless allows customers to choose a prepaid plan in which they are charged only for the minutes they use.

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

B. Proposed Lifeline Plans

i-wireless has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC’s Rules (47 C.F.R. §

54.101(a)) throughout Missouri. i-wireless will provide Lifeline service to qualifying customers requesting this service throughout Missouri pursuant to the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1). i-wireless commits to offer Lifeline and Link Up discounts consistent with 47 CFR § 54.401, 47 C.F.R. § 54.403, 47 CFR § 54.411, and 4 CSR 240-3.570(2)(A)7 and commits to publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service consistent with 47 CFR 54.405, 4 CSR 240-3.570(2)(A)7.

i-wireless intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice usage at all price points. i-wireless' 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. i-wireless will provide Lifeline service under the brand name "Access Wireless." The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other i-wireless prepaid customers, with one notable exception: prepaid Lifeline services will be free of charge. As Exhibit 2 demonstrates, i-wireless' Lifeline service offering proposes to give eligible customers three (3) Lifeline Plan choices:⁵

1. 150 Anytime Minutes Plan. Under the 150 Anytime Minute Plan, eligible customers enjoy a free handset, 150 anytime minutes, rollover minutes, free incoming text messages, free customer care calls and participation in the Kroger loyalty Free Minute program, whereby they can earn free minutes simply by grocery shopping.

⁵ i-wireless has an application pending with the FCC for ETC designation in Alabama, Connecticut, Delaware, District of Columbia, New Hampshire, New York, North Carolina, Tennessee and Virginia; and has applications for ETC designation pending in Arizona, Arkansas, California, Colorado, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Michigan, New Jersey, Ohio, Oregon, Pennsylvania, South Carolina, Utah, Washington and West Virginia; no such petitions have been denied.

2. 250 Anytime Minutes Plan. Under this Plan, eligible customers receive a free handset and 250 anytime minutes. Customers will not qualify for the perks listed above, forgoing these for the higher level of minutes.
3. \$15 Retail Discount Plan. The third option allows Lifeline eligible customers to choose from any i-wireless monthly retail plan⁶ at a \$15 discount. Under this \$15 Retail Discount Plan, a customer can, for example, pay \$10 additional per month and receive 200 anytime minutes, unlimited text messaging and 200 megabytes of data, plus all of the perks listed under the 150 minute plan.

Customers can change their plan on their monthly plan date, without penalty, should they determine that another plan better meets their needs or if their needs change. i-wireless does not impose burdensome credit checks, long-term service contracts, or roaming charges. Furthermore, i-wireless does not assess charges for activation or connection of service, and the 150 and 250 minute plans include all applicable taxes and fees; thus, Lifeline customers are able to receive free service with no additional charges for taxes or activation. Minutes are credited to a customer's account at the beginning of every 30-day cycle, which is initiated on their Lifeline activation date. A customer's handset does not have to be "on" to receive minutes, as i-wireless' operations are system-based, not handset-based. Customers may place calls to 911 for free, even if there are no minutes remaining on their account.

Lifeline customers will receive an E911-compliant wireless handset at no charge, and i-wireless intends that all handsets will be data-capable, high quality refurbished phones. i-wireless' market research of the Lifeline-eligible consumer suggests that they prefer a feature-rich, high-end refurbished phone to a new phone that has less to offer. These phones come with

⁶ Except a Text Only Plan.

a one year manufacturer warranty, and may be replaced at no charge annually, if necessary, or upon handset malfunction.⁷ With data-capable phones, i-wireless customers are able to interface with online customer service and check the balance of their minutes for free at anytime, regardless of their service plan.

In addition to free voice services, prepaid Lifeline customers also will have access to voice mail, caller I.D. and call waiting services at no additional charge, even after their initial allotment of free minutes has been consumed. Customers are not bound by a local calling area requirement; all i-wireless plans come with domestic long distance at no extra charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Unlike many carriers, i-wireless does not decrement minutes for incoming text messages, balance inquiries, or calls placed to customer service, and unused minutes carry over to the following month.⁸ i-wireless Lifeline customers will have access to the same exceptional customer care provided to retail customers. The Company contracts with a high quality, U.S. domestic customer care group whose hold time is among the lowest in the prepaid wireless industry. Therefore the benefits with i-wireless in regards to customer service are three-fold: service standards are high, wait times are low, and minutes of use do not count against a customer's account balance.

Furthermore, through i-wireless' partnership with The Kroger Co. ("Kroger"), the nation's largest grocery retail chain and the second largest retailer overall, customers can accumulate free minutes for dollars spent at participating Kroger-owned store locations simply by using their Kroger loyalty shopper's card.⁹ For every \$100 in qualified spending¹⁰, 20

⁷ Handsets may be replaced for a nominal fee if the customer is at fault.

⁸ These "perks" are not available on the 250-minute plan, as outlined in Exhibit 2. Exhibit 2 also details the amount of eligible carry over minutes for each plan.

⁹ The Kroger Co. has a 50% ownership interest in i-wireless. Detailed information on the Free Minutes program is located on the Company's website, www.iwirelesshome.com.

minutes will automatically be applied to a customer's account balance, or a \$1 credit will be applied to the account balance if the customer is on an unlimited voice plan. Currently, i-wireless, through its partnership with Kroger, has a presence in 23 Kroger stores in Missouri. Lifeline customers can participate in this Free Minutes program even when utilizing government-subsidized forms of payment. By way of example, households can receive up to a \$668 monthly Supplemental Nutrition Assistance Program (SNAP; formerly known as food stamps) allotment. These customers, taking the Company's feature-rich 150 Minute plan as an example, would qualify for an additional 134 free minutes, on average, per month. Added to their base plan, this would give them, on average, 284 minutes per month, along with all of the perks (rollover minutes, free incoming texts and world class customer care). Lifeline customers can purchase additional airtime if needed. Airtime cards are sold in denominations of \$10, \$20 and \$50. Additional airtime may be purchased at Kroger stores, over the phone (by calling the IVR or through customer care interface) or online. i-wireless sends low and depleted balance alerts in the form of a free text message to the customer, and also alerts the customer through a free text message when minutes have been added to their account.

C. Plan Enrollment

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to i-wireless' .Access Wireless website, which will contain information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. Customers may then request that a Lifeline enrollment form be mailed to them, or they can download a form from the internet or retrieve a

¹⁰ Qualified purchases do not include payments for taxes, office services, alcohol, tobacco, fuel, tickets, Western Union, Green Dot cards, MoneyPak, Kroger Gift Cards, prescriptions and any purchases prohibited by law. Dollars spent continue to accumulate until the \$100 threshold is reached; any increments over \$100 carry over and do not expire.

form from i-wireless kiosks in Kroger. Applicants must complete the enrollment form, which will include a place where applicants must attest and certify under penalty of perjury that they satisfy the requisite eligibility criteria. In addition, each applicant is required to certify under penalty of perjury, at the time of application and annually thereafter, that they are head of their household and receive Lifeline-supported service only from i-wireless. The applicant must return the signed enrollment form and all supporting documentation to the address provided by i-wireless. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under i-wireless' supervision by managers experienced in the administration of the Lifeline program.

D. Prevention of Waste, Fraud and Abuse

i-wireless recognizes the importance of safeguarding the USF. Therefore, the Company has implemented the following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of the program. If no usage appears on an i-wireless Lifeline customer's account during any continuous 60-day period, i-wireless will promptly notify the customer that the customer is no longer eligible for i-wireless Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but i-wireless will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, receiving or sending a text message, downloading data or adding money to the account), i-wireless will promptly deactivate Lifeline services and cease to seek reimbursement from the USF for that customer. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

i-wireless believes that the first line of defense against fraud and abuse is to partner with high quality channels and organizations. By emphasizing the social benefits of the program and partnering with those focused on the benefits to their constituents, the Company believes that it can avoid potential misuse of the program. To further protect the integrity of the USF, i-wireless has contracted with: (a) Solix, a well-known, experienced and reputable firm in the USF industry, to assist in reviewing customer applications and verifying eligibility, and to ensure that i-wireless is in compliance with federal and state regulations at all times; and (b) CGM, LLC of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate i-wireless' subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from i-wireless 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, i-wireless ensures that it does not over-request from support funds.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the "primary responsibility" for the designation of ETCs.¹¹ 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.¹² Therefore, the Commission has the authority to designate i-wireless as an ETC. Pursuant to this authority, the Commission has historically participated in

¹¹ 47 U.S.C. § 214(e)(2).

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

determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier.¹³ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). i-wireless 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, on April 1, 2009, i-wireless filed with the FCC a petition requesting that the FCC exercise its forbearance authority under Section 10 of the Act (47 U.S.C. § 160) with respect to the facilities-based service requirement.¹⁴ The FCC granted the *Petition for Forbearance* for the purposes of participating in the Lifeline program in an Order dated June 25, 2010.¹⁵ 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 *i-wireless Forbearance Order*, and therefore, may not apply the facilities-based requirement to i-wireless. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant i-wireless' request for designation as an ETC throughout the State of Missouri.

¹³ 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*”).

¹⁴ See *i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, CC Docket No. 96-45, filed Apr. 1, 2009, (“*Petition for Forbearance*”).

¹⁵ *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) (“*i-wireless Forbearance Order*”). A copy of the *i-wireless Forbearance Order* is attached hereto as Exhibit 3.

A. The ETC Designation Request Is Consistent with Recent Commission Precedent

i-wireless' request for ETC designation to participate in the Lifeline program is consistent with the Commission's recent designation of TracFone as an ETC.¹⁶ In its decision, the Commission determined that TracFone satisfied all of the necessary eligibility requirements and that designation of a prepaid wireless provider as an ETC would serve the public interest. i-wireless requests that the Commission expeditiously process its ETC Application so that it can quickly commence providing qualifying low-income Missouri households with affordable USF-supported wireless services during these challenging economic times for all state residents. Designation of i-wireless as an ETC would further competition for wireless Lifeline services and would offer Lifeline-eligible consumers an additional choice of providers for accessing telecommunications services, representing a significant step towards ensuring that all low-income consumers share in the many benefits associated with access to wireless services.

IV. I-WIRELESS SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

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.¹⁷ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will 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. Applicants also must commit to

¹⁶ See *TracFone ETC Order*.

¹⁷ *USF Order*, at 8858-59, ¶ 145.

advertise the availability and rates of such services.¹⁸ As detailed below, i-wireless satisfies each of the above-listed requirements.

A. i-wireless Will Provide Service Through Resale

In the *i-wireless Forbearance Order*, The FCC conditionally granted i-wireless' *Petition for Forbearance* from the facilities requirement, "given the importance of public safety and in light of the fact that a Lifeline ETC is generally a low-income customer's only connection to the public switched telephone network."¹⁹ The FCC further explained that "requiring a Lifeline provider to own the facilities it uses to offer service does not necessarily further the statutory goal of the low-income program."²⁰

The FCC specifically conditioned its grant of forbearance on i-wireless as follows:

(a) i-wireless providing its Lifeline customers with basic 911 and enhanced 911 ("E911") access regardless of activation status and availability of prepaid minutes; (b) i-wireless providing its new Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) i-wireless complying with conditions (a) and (b) as of the date it provides Lifeline service; (d) i-wireless obtaining a certification from each Public Service Answering Point ("PSAP") where i-wireless seeks to provide Lifeline service confirming that i-wireless provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met; (e) i-wireless requiring each customer to self-certify at time of service activation and annually thereafter that he or she is the head of household and receives Lifeline-supported service only from i-wireless; (f) i-wireless establishing safeguards to prevent its customers from receiving multiple i-wireless Lifeline subsidies at the same address, and (g) i-wireless dealing directly with the customer to certify and verify the customer's Lifeline eligibility. The FCC required i-wireless to submit a plan describing the measures it would take to implement each of these conditions.²¹

In accordance with the *i-wireless Forbearance Order*, i-wireless filed its compliance plan with the FCC on July 26, 2010. In that compliance plan, i-wireless described how it would comply

¹⁸ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

¹⁹ *i-wireless Forbearance Order* ¶ 11.

²⁰ *Id.* ¶ 15.

²¹ See *Id.* ¶ 16.

with each of the FCC's stated conditions. A copy of its compliance plan is attached to this Application as Exhibit 4.

B. i-wireless Is a Common Carrier

CMRS resellers like i-wireless are treated as common carriers for regulatory purposes.²²

C. i-wireless Will Provide All Required Services and Functionalities

i-wireless offers, or will offer upon designation as an ETC in Missouri, all of the services and functionalities required by 4 CSR 240-3.570(3)(C) and Section 54.101(a)(1)-(9) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a)) including the following:

1. Voice Grade Access to the Public Switched Telephone Network

i-wireless provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Sprint. Bandwidth for this voice-grade access is at minimum between 300 and 3,000 MHz as required by FCC rules.²³

2. Local Usage

As part of the voice grade access to the PSTN, an ETC must provide local calling services to its customers. The FCC has determined that a carrier satisfies the local usage requirements when it offers customers rate plans containing varying amounts of local usage.²⁴

²² *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).

²³ *See* 47 U.S.C. § 54.101(a)(1).

²⁴ *See e.g., Farmers Cellular, Inc.*, CC Docket No. 96-45, Memorandum Opinion and Order, 18 FCC Rcd 3848, 3852 ¶ 9 (2003); *Pine Belt Cellular, Inc. and Pine Belt PCS, Inc.*, CC Docket No. 96-45, Memorandum Opinion and Order, 17 FCC Rcd 9589, 9593 ¶ 10 (2002); *Western Wireless Corp., Petition for Designation as an Eligible*

i-wireless offers a variety of rate plans that provide its customers with local usage capabilities included within the flat per minute or per month rate.

3. Dual Tone Multi-Frequency Signaling or its Functional Equivalent

i-wireless provides dual tone multi-frequency (“DTMF”) signaling to expedite the transmission of call set up and call detail information throughout the network. All wireless handsets offered for sale by the Company are DTMF-capable.

4. Single-Party Service or its Functional Equivalent

“Single-party service” means that only one party will be served by a subscriber loop or access line during a telephone transmission. i-wireless provides single party service to its customers for the duration of each telephone call, and does not provide multi-party (or “party-line”) services.

5. Access to 911 and E911 Emergency Service

i-wireless provides 911 and E911 access for all of its customers. i-wireless also complies with the FCC’s regulations governing the deployment and availability of E911 compatible handsets. In particular, the Company will fully comply with the FCC’s E911 requirements applicable to wireless resellers.²⁵ As stated previously, i-wireless will provide access to emergency services consistent with the requirements set forth in the *i-wireless Forbearance Order*.²⁶

6. Access to Operator Services

i-wireless offers all of its customers access to operator services, in accordance with the

Telecommunications Carrier in the State of Wyoming, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 48, 52 ¶ 10 (2000).

²⁵ See *Revision of the Commission’s Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, Report and Order- and Second Further Notice of Proposed Rulemaking*, 18 FCC Rcd 25340 (2003).

²⁶ See *i-wireless Forbearance Order* ¶ 11.

FCC's requirements.

7. Access to Interexchange Service

i-wireless' service provides its customers with the ability to make interexchange, or long distance, telephone calls. In fact, interexchange calls are included in i-wireless' service with no additional charge.

8. Access to Directory Assistance

All i-wireless customers are able to dial "411" to reach directory assistance services from their wireless handsets.

9. Toll Limitation for Qualified Low-Income Customers

Toll limitation allows customers to block the completion of outgoing long distance calls to prevent them from incurring significant long distance charges and risking disconnection. As described above, i-wireless provides its wireless service on a prepaid, or pay-as-you-go, basis. i-wireless' service, moreover, is not offered on a distance-sensitive basis and minutes are not charged separately for local or domestic long distance services. Customers also must specifically authorize access for international services, for which additional charges may apply. As the FCC found in its grant of ETC designation to Virgin Mobile, "the prepaid nature of [a prepaid wireless service provider's] service offering works as an effective toll control."²⁷ The nature of i-wireless' service, therefore, mitigates any concerns that low-income customers will incur significant charges for long distance calls resulting in disconnection of their service. Thus, i-wireless complies with the requirement that it not collect a deposit from a Lifeline subscriber if

²⁷ See *Federal-State Joint Board on Universal Service; In the Matter of Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petitions for Designation as an Eligible Telecommunications Carrier in the States of New York, North Carolina, Pennsylvania, Tennessee and Virginia*, Order, FCC 09-18 (rel. March 5, 2009)("Virgin Mobile Order"), 24 FCC Rcd at 3394 ¶ 34.

the customer voluntarily elects toll limitation.²⁸ I-wireless also commits to not charge a Lifeline subscriber a monthly portability charge, pursuant to Section 54.401(e) of the FCC's regulations.

10. Access to telecommunications relay services by dialing 711.

All i-wireless customers are able to access telecommunication relay services by dialing 711.

D. i-wireless Will Advertise the Availability of Supported Services

i-wireless will broadly advertise the availability and rates for the services described above using media of general distribution as required by Section 54.201(d)(2) of the FCC's regulations and pursuant to 4 CSR 240-3.570(2)6-7.²⁹ The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline services, promoting the availability of cost-effective wireless services to this neglected consumer segment.

i-wireless' partnership with Kroger presents a unique advantage when seeking to increase consumer awareness of the Lifeline program. Kroger has a long-standing relationship with the low income consumer, and even caters to the consumer through store layout, such as clearly labeling food stamp-eligible items. i-wireless intends to utilize Kroger's existing relationship with Lifeline-eligible consumers in order to inform these consumers of their eligibility for Lifeline support. For example, when a customer pays with a government-subsidized form of payment at Kroger, their printed cash register receipt will automatically generate information informing them of their eligibility for the Lifeline program and how they can obtain more information.³⁰ i-wireless will also make use of the Kroger in-store radio, printed advertisements,

²⁸ See 47 U.S.C. § 54.401(c).

²⁹ See 47 C.F.R. § 54.201.

³⁰ See attached Exhibit 5 (to be filed in a supplemental pleading the week of May 23, 2011) for sample advertisements and the Lifeline Creative Brief being used to develop additional collateral. One of the advertisements is under the old trade name of "Access Mobile" and will be updated to "Access Wireless" before use.

and signage. Printed materials describing i-wireless' Lifeline program will be available at i-wireless in-store kiosks. Given the relationship that exists between i-wireless, Kroger, and low income consumers, i-wireless expects to be able to inform consumers of the availability of Lifeline service in a manner that will result in significantly higher participation in the Lifeline program by qualified consumers than has been the case in the past.

Though Kroger will be a primary point of contact with consumers and a dynamic source for advertising the Lifeline program, i-wireless will also seek to reach eligible consumers outside of its Kroger footprint. Consumers are not required to visit a Kroger store – they will be made aware of a toll free number and website whereby they can apply for the Company's Lifeline program. i-wireless intends to advertise its Lifeline service using printed advertisements, billboards and public transit signage. i-wireless will also promote the availability of its Lifeline offerings by distributing brochures at various state and local social service agencies, and intends to partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline services. The Company's advertising efforts will target consumers throughout the Sprint coverage area, both in metropolitan and rural areas.

Statistics suggest that there are many eligible customers who are not yet aware of the programs. According to the best data available to the Company, as of December 31, 2009, fewer than 20% of consumers eligible for Lifeline Services in the State of Missouri were being provided such services.³¹ i-wireless believes that its advertising and outreach efforts detailed above will result in increased participation in the Lifeline program.

E. i-wireless Requests Designation Throughout Its Service Area in Missouri

³¹ See attached Exhibit 6, 2009 Lifeline Participation Rates by State (to be filed in a supplemental pleading the week of May 23, 2011), which was obtained from USAC, an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC. USAC administers USF programs for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries. Also attached is an FCC News Release dated September 14, 2009.

i-wireless is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, i-wireless is required to describe the geographic area(s) within which it requests designation as an ETC. i-wireless requests designation as an ETC for its entire service area in Missouri.³² i-wireless 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 households. It does not seek and will not accept high cost support. Therefore, its designation 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.”³³ The Commission may designate i-wireless as an ETC in non-rural areas that i-wireless serves without redefining the service areas of non-rural telephone companies. The Commission may designate i-wireless as an ETC in rural telephone company service areas upon a finding that such designation would serve the public interest.³⁴

F. Service Commitment Throughout the Proposed Designated Service Area

i-wireless provides service in Missouri by reselling service which it obtains from its underlying facilities-based provider. The provider's network is operational and largely built out. Thus, i-wireless 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. Indeed, it already

³² A list of wire centers in which the Company requests ETC designation is attached hereto as Exhibit 7. Since i-wireless does not seek designation below the study area level of a rural telephone company, no “cream skimming” analysis is required.

³³ 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).

³⁴ See 47 C.F.R. § 54.207(c).

serves those areas. Therefore, i-wireless will be able to provide Lifeline service to all qualified customers on a timely basis or within a reasonable period of time in accordance with 47 C.F.R. § 54.202(a)(1)(B). i-wireless further commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service, as required in 47 C.F.R. § 54.202(a)(1)(i).

G. Network Improvement Plan

Pursuant to 4 CSR 240-3.570(2) (A)1-3, each request for ETC designation shall include: the intended use of the high-cost support; including a two year plan to demonstrate the proper use of high-cost support. Under FCC guidelines, an ETC applicant must submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed designated service area. This guideline has no application where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because i-wireless seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline services to eligible customers, submission of a Five-Year Network Improvement Plan is not required, and the provisions of 4 CSR 240-3.570(2) (A)1-3 are not applicable to i-wireless. Based upon the foregoing, i-wireless respectfully requests a waiver of 4 CSR 240-3.570(2) (A)1-3. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, is distributed on a per-household basis and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low income users, which is clearly in the public interest.

H. Ability to Remain Functional in Emergency Situations

In accordance with 47 CFR §54.202(a)(2) and 4 CSR 240-3.570(2)4, i-wireless, through

its underlying carrier, has the ability to remain functional in emergency situations. Since i-wireless provides service to its customers by reselling the services of Sprint, this arrangement allows the Company to provide to its customers the same ability to remain functional in emergency situations as currently provided by Sprint to its own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

I. Commitment to Consumer Protection and Service Quality

Under FCC and Commission guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.³⁵ As a reseller, i-wireless' service is of the same quality and reliability as that of its underlying carrier(s). The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards, including consumer privacy protection standards pursuant to 4 CSR 240-3.570(2)(A)8. Specifically, i-wireless commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service, pursuant to 47 C.F.R. § 54.202(a)(3) and 4 CSR 240-3.570(2)(B). A copy of the current version of the CTIA consumer code is attached hereto as Exhibit 8. In addition, i-wireless commits that after it is designated as an ETC it will file with the Commission any changes to the consumer code for wireless service included with its application or any subsequent code approved under Section 240-3.570(2)(B) within thirty (30) days of the changes. i-wireless understands that the Commission shall allow interested parties thirty (30) days to provide comment as to whether i-wireless should be required to commit to the proposed changes or

³⁵ See 47 C.F.R. § 54.202(a)(3); see also 4 CSR 240-3.570(2)(A)8.

should continue to abide by the consumer code for wireless service currently approved for i-wireless.

J. Local Usage Requirement

Pursuant to 47 C.F.R. § 54.202(a)(4) and 4 CSR 240-3.570(2)(A)10 and FCC rules, an applicant for ETC designation must demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.³⁶ In analyzing whether an ETC applicant's plan is comparable to the underlying ILEC's, the FCC reviews all aspects of the plan on a case-by-case basis, including the nature of the supported service, the size of the local calling area, the inclusion of additional services (e.g., caller I.D., etc.) and the amount of local usage.³⁷

i-wireless' proposed Lifeline offering fully complies with the local usage requirements established by the FCC. i-wireless offers a variety of rate plans that provide its customers with local usage capabilities in the form of monthly plans, unlimited plans or pay-per-use plans—but without the burden of contracts, activation fees or roaming charges. Similar to ILEC Lifeline offerings, i-wireless customers will have the option to apply the Lifeline discount to the Company's retail rate plans and will have the option for unlimited local calling. Not only will i-wireless' offering be comparable to the underlying ILEC plans, but it also will exceed them in several respects. i-wireless will offer customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, i-wireless customers can use these free minutes to place calls statewide (or even nationwide) because i-wireless does not constrict customers' use by imposing a local calling area requirement. i-wireless will also provide Lifeline customers with E911 capabilities and access to voice mail,

³⁶ 47 C.F.R. § 54.202(a)(4).

³⁷ See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6385 (2005).

caller I.D., and call waiting services at no cost.

K. Equal Access Requirement

Pursuant to the FCC's rules and 4 CSR 240-3.570(2)(A)9, i-wireless acknowledges it shall provide equal access pursuant to 4 CSR 240-32.100(3) and (4) if all other ETCs in the Designated Service Area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996. The FCC's rules (47 C.F.R § 54.202(a)) do not impose a general equal access requirement on ETC applicants at this time, but instead suggest the applicants acknowledge that an ETC applicant may be required to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area. i-wireless acknowledges this potential and will abide by the requirement should it occur in the future.

L. i-wireless Will Comply with the Lifeline Certification and Verification Requirements in 47 C.F.R. § 54.410

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. i-wireless will certify and verify consumer eligibility in accordance with the FCC's requirements and with applicable Commission rules governing certification and verification of Lifeline eligibility.³⁸ i-wireless has contracted with Solix, a company that is very experienced in Lifeline program rules and regulations, to ensure that it is in compliance at all times.

M. i-wireless Will Comply With All Regulations Imposed By The Commission

By this Application, i-wireless hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application. i-wireless certifies that all federal USF

³⁸ 47 C.F.R. §§ 54.409, 54.410, 4 CSR 31.050.

funding received will be used for Lifeline support and will be flowed through to the direct benefit of eligible low income consumers. On behalf of its Missouri customers, i-wireless currently contributes to the federal and state USF and remits all applicable surcharges and fees in Missouri, including the E911 surcharge. i-wireless will likewise pay into the federal and state USF and emergency services fund for its Lifeline customers. i-wireless will comply with the Commission's requirements set forth in 4 CSR 240-3.570; i-wireless is a prepaid wireless service provider that does not issue bills to its customers, and therefore requests waivers of 4 CSR 240-3.570(3)(A)and(B). Within 30 days of receiving ETC status, i-wireless will make an informational filing describing all service offerings, pursuant to 4 CSR 240-3.570(3)(D). i-wireless commits to maintain a record of customer complaints, pursuant to 4 CSR 240-3.570(3)(E). i-wireless will notify the Commission of any changes to contact information, pursuant to 4 CSR 240-3.570(3)(F). Upon Commission request, i-wireless is prepared to answer questions or present additional testimony or other evidence about its services within the state.

V. DESIGNATION OF I-WIRELESS 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.³⁹ There is no question that designation of i-wireless as an ETC in Missouri will further the public interest, in accordance with 47 C.F.R. § 54.202(c) and 4 CSR 240-3.570(2)(A)5, by providing Missouri consumers, especially low-income consumers, with lower prices and higher quality services. Many low-income customers

³⁹ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

in Missouri have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

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. Given this context, designating i-wireless as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the State of Missouri—the intended beneficiaries of universal service.

i-wireless' Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. i-wireless' Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks, contracts, activation fees or roaming charges. i-wireless customers are able to choose a prepaid plan in which they are charged only for the minutes they use.

The proposed i-wireless Lifeline offerings compare favorably with those of other competitive ETCs, but also offer the customer a novel variety of useful options. For example, i-wireless' offer of 150 free minutes is competitive with TracFone's Safelink service of 125 or 250 minutes, given i-wireless does not charge customers for customer care calls or incoming text messages and allows minutes to rollover. In addition, customers are offered the flexibility of taking a dollar credit of \$15, in lieu of the minutes, and applying it towards the i-wireless retail

plan of their choice (excluding a text only plan). Finally, i-wireless' affiliation with Kroger awards the consumer exclusive benefits, such as the Free Minutes program, and at the same time grants i-wireless both proximity to and unique insight into the Lifeline-eligible consumer.

i-wireless foresees that the implementation of its Lifeline program will create the need for i-wireless employees in Missouri. Once its Lifeline program is underway, i-wireless intends to hire Missouri residents as representatives who will work with store locations and distribution throughout the state.

Most importantly, i-wireless' Lifeline service will provide low-income Missouri residents with the convenience and security offered by wireless services—even if their financial position deteriorates. i-wireless' prepaid wireless plans enable consumers to enjoy the benefits of wireless telecommunication without being subject to extensive credit reviews and long-term service commitments, which historically have limited the availability of wireless service to many Americans, including many South Carolinians. ETC designation in Missouri would enable i-wireless to offer appealing and affordable service offerings to low-income Missouri customers to ensure that they are able to afford wireless services on a consistent and uninterrupted basis. 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 i-wireless with the authority necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of i-wireless' Application will serve the public interest in increasing the number of ETCs in Missouri. By granting ETC status to i-wireless, the Commission will enable i-

wireless to increase the number of Missouri residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Missouri.

In sum, ETC designation in the State of Missouri would enable i-wireless to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, i-wireless would provide “increased consumer choice, high-quality service offerings, and mobility,”⁴⁰ as well as the safety and security of effective 911 and E911 services.⁴¹

A. The Benefits of Competitive Choice

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades⁴² and by the Commission since the early 1980s. Designation of i-wireless as an ETC will promote competition and innovation, and spur other carriers to target low-income consumers with service offerings tailored to their needs and to improve their existing networks to remain competitive, resulting in improved services to consumers. Designation of i-wireless as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.⁴³ Introducing i-wireless into the market as an additional wireless ETC provider will afford low income Missouri residents a wider choice of providers and available services while enhancing the 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.

⁴⁰ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

⁴¹ See *Id.* at 3391 ¶ 23.

⁴² See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

⁴³ See 47 U.S.C. § 254(b)(1).

B. Impact on the Universal Service Fund

i-wireless' request for designation as an ETC solely for Lifeline purposes would not unduly burden the USF or otherwise reduce the amount of funding available to other ETCs. The secondary role of Lifeline support with respect to overall USF expenditures is well documented. According to the Joint-Board's most recent monitoring report, Lifeline funding totaled approximately \$974 million in 2009 while high-cost program expenditures amounted to approximately \$4.3 billion—more than four times the amount of Lifeline funding.⁴⁴ Although many parties have raised concerns over the growth in the USF's high-cost program, the Lifeline program has triggered no similar outcry. Designation of i-wireless as an ETC in the State of Missouri, however, raises no similar concerns and 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. As noted in the FCC's *i-wireless Forbearance Order*, "the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest."⁴⁵ "A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance [associated with granting i-wireless' *Petition for Forbearance*] in the context of the Lifeline program outweighs the potential costs."⁴⁶

VI. ANTI-DRUG ABUSE CERTIFICATION

i-wireless certifies that no party to this Application is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

⁴⁴ See *Universal Service Monitoring Report*, CC Docket 98-202, Tables 2.2 and 3.1 (2010).

⁴⁵ *i-wireless Forbearance Order*, ¶ 19.

⁴⁶ *Id.*

VII. CONCLUSION

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

WHEREFORE, i-wireless respectfully requests that the Commission promptly designate i-wireless as an ETC in the State of Missouri solely for purposes of participating in the Lifeline program.

Respectfully submitted,

/s/Lisa A. Gilbreath

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May 20, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this the 20th day of May, 2011, served a true copy of the foregoing Application upon the following parties, listed below, in accordance with Commission Rules:

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

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

/s/Lisa A. Gilbreath
Lisa A. Gilbreath

EXHIBIT 1

Certification of Patrick McDonough, Vice President, i-wireless, LLC

(to be filed in a supplemental pleading the week of May 23, 2011)

EXHIBIT 2

i-wireless, LLC Proposed Lifeline Rates

Option 1: Lifeline 150 Minutes Plan*

150 anytime minutes per month

(additional usage priced at 10 cent minutes and 10 cent text messages)

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

**includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 150 minutes can be rolled over to following month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

Option 2: Lifeline 250 Minutes Plan*

250 anytime minutes per month

(additional usage priced at 10 cent minutes and 10 cent text messages)

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

**includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to 911 emergency services
- Free balance inquiries

***additional charges apply for:*

- incoming text messages (charge per text: 10 cents; one text message decrements one minute of use)
- calls to Customer Service (minutes decrement from customers 250 minutes)

****additional restrictions:*

- Minutes cannot be rolled over to next month
- Customer not eligible to earn additional minutes through the Kroger Free Minute Loyalty Program

Option 3: Lifeline \$15 Retail Discount Plan*

Lifeline eligible customers may choose any i-wireless monthly retail plan (excluding text only plans) at a \$15 discount. The following retail monthly plans will be available as of February 2011:

Talk Plans (monthly)

- 200 anytime minutes, unlimited text messages, and 200 megabytes of data (web browsing and e-mail on capable phones) (additional usage priced at 10 cent minutes)
Net cost to Lifeline customer: **\$10** (plus applicable taxes and fees)
- 1,000 minutes, unlimited text messages and 500 megabytes of data (web browsing and e-mail on capable phones) (additional usage priced at 10 cent minutes)
Net cost to Lifeline customer: **\$25** (plus applicable taxes and fees)
- Unlimited talk (10 cents per text message; data packs sold separately)
Net cost to Lifeline customer: **\$25** (plus applicable taxes and fees)
- Unlimited talk, unlimited text messages and 2.5 gigabytes of data (web browsing and e-mail on capable phones)
Net cost to Lifeline customer: **\$45** (plus applicable taxes and fees)

**includes:*

- Free handset
- Free Voicemail, Caller-ID and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 1500 minutes can be rolled over to next month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

EXHIBIT 3

i-wireless Forbearance Order

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

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A))	

ORDER

Adopted: June 22, 2010

Released: June 25, 2010

By the Commission:

I. INTRODUCTION

1. In this order, we grant in part and deny in part a petition for forbearance filed by i-wireless, LLC (i-wireless), a prepaid wireless resale provider, requesting that the Commission forbear from the requirement that a carrier designated as an eligible telecommunications carrier (ETC) for purposes of federal universal service support provide services, at least in part, over its own facilities.¹ As a result, i-wireless may seek ETC designation to offer discounted service to qualified low-income consumers through the universal service Lifeline program. i-wireless will be subject to the same conditions that the Commission previously applied to prepaid wireless resellers TracFone Wireless, Inc. and Virgin Mobile USA, L.P. in granting similar requests. The conditions will help to ensure that, if i-wireless is granted ETC designation for the purpose of providing Lifeline service, its low-income consumers have access to 911 and enhanced 911 services and will help to protect the universal service fund against waste, fraud and abuse. However, we deny i-wireless's petition for forbearance for the purposes of participating in the Link Up program because the company has not demonstrated that granting its request satisfies the three-prong statutory test for forbearance.²

II. BACKGROUND

2. Congress directed the Commission to establish the universal service fund to help ensure that "[q]uality services [are] available at just, reasonable, and affordable rates" for consumers throughout the nation, "including low-income consumers."³ The Commission's Lifeline program furthers this goal by reducing the price of monthly telephone service for low-income consumers, and the Commission's

¹ i-wireless, LLC Petition for Forbearance, CC Docket No. 96-45 (filed Apr. 1, 2009) (Forbearance Petition). On March 23, 2010, pursuant to section 10(c) of the Act, the Wireline Competition Bureau (Bureau) extended until June 30, 2010, the date on which the Forbearance Petition shall be deemed granted in the absence of a Commission decision that the petition fails to meet the standard for forbearance under section 10(a) of the Act. *i-wireless, LLC Petition for Forbearance*, CC Docket No. 96-45, Order, 25 FCC Rcd 2762 (Wireline Comp. Bur. 2010); 47 U.S.C. § 214(e).

² 47 U.S.C. § 160(a).

³ 47 U.S.C. § 254(b)(3).

Link Up program furthers this goal by reducing the customary connection charge for commencing telephone service at a low-income consumer's principal place of residence.⁴

3. The Communications Act of 1934, as amended (the Act), provides that only an entity designated as an eligible telecommunications carrier shall be eligible for universal service high-cost and low-income support.⁵ To become an ETC, a common carrier must offer the services supported by the federal universal service support mechanisms "either using its own facilities or a combination of its own facilities and resale of another carrier's services" to each customer in its designated service area.⁶ Carriers designated as ETCs generally must participate in the Lifeline and Link Up programs and are reimbursed for the revenues foregone through their participation in these programs.⁷

4. The Commission has granted two petitions for forbearance from the facilities requirement for ETC designation in section 214(e) of the Act. In 2005, the Commission forbore from applying the facilities requirement to TracFone Wireless, Inc. (TracFone), a wireless reseller, insofar as TracFone sought ETC designation only for the purpose of receiving Lifeline support.⁸ Similarly, in 2009, the Commission forbore from applying the facilities requirement to another wireless reseller, Virgin Mobile USA, L.P. (Virgin Mobile).⁹ In both orders, the Commission conditioned forbearance on the carriers' meeting certain obligations upon being designated as an ETC that are tailored to the concerns arising from each carrier's lack of facilities and proposed service offering.¹⁰

⁴ Through the Lifeline program, low-income consumers may receive discounts of up to \$13.50 off the monthly cost of telephone service, with the federal program reimbursing the ETC up to \$10 each month. 47 C.F.R. § 54.401(a)(2). In tribal areas, the federal program reimburses ETCs up to an additional \$25 each month. 47 C.F.R. § 54.405(a)(4). Through the Link Up program, low-income consumers may receive discounts of up to \$30 off the connection charge. 47 C.F.R. § 54.411(a)(1). In tribal areas, low-income consumers may receive up to an additional \$70 off the connection charge. 47 C.F.R. § 54.411(a)(3).

⁵ 47 U.S.C. § 254(e). A carrier need not be an ETC to participate in the schools and libraries or rural health care universal service programs. 47 U.S.C. § 254(h)(1)(A) and (B)(ii); see *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 9015, para. 449 (1997) (*Universal Service First Report and Order*) (subsequent history omitted); *Federal-State Joint Board on Universal Service*, CC Docket No. 96-46, Fourteenth Order on Reconsideration, 14 FCC Rcd 20106, 20114-15, para. 19 (1999) (*Fourteenth Order on Reconsideration*).

⁶ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)(1). Because a carrier need not be an ETC to participate in the schools and libraries or rural health care universal service programs, a carrier need not offer service over its own facilities to receive support from those programs. See *supra* note 5.

⁷ See 47 C.F.R. § 54.407(b)-(c). ETCs designated for the limited purpose of participating in the Lifeline program, in contrast, may only receive Lifeline support.

⁸ *Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005) (*TracFone Forbearance Order*).

⁹ *Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A); Petition for Designation as an Eligible Telecommunications Carrier in the State of New York; Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia; Petition for Limited Designation as an Eligible Telecommunications Carrier in the State of North Carolina; Petition for Limited Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, CC Docket No. 96-45, Order, 24 FCC Rcd 3381 (2009) (*Virgin Mobile Forbearance Order*).

¹⁰ Specifically, each carrier must: (1) provide its Lifeline customers with 911 and enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (2) provide its Lifeline customers with E911-compliant handsets and replace, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (3) comply with conditions (1) and (2) as of the date it provides Lifeline service; (4) obtain a certification from each public-safety answering point (PSAP) where the carrier provides Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certify that it does so if certain conditions are met; (5) require each customer to self-certify at time of service activation and (continued . . .)

5. *i-wireless Forbearance Petition.* Like Tracfone and Virgin Mobile, i-wireless is a non-facilities-based commercial mobile radio service (CMRS) provider (i.e., a pure wireless reseller) that provides prepaid wireless telecommunications services.¹¹ On April 1, 2009, i-wireless filed a petition seeking forbearance from the facilities requirement of section 214(e) of the Act so that it may be designated as an ETC and be eligible to receive Lifeline and Link Up low-income support.¹² i-wireless states that its request for forbearance satisfies the statutory requirements and is in the public interest.¹³ Further, i-wireless agrees to abide by the conditions imposed on TracFone and Virgin Mobile as part of the Commission's decisions granting those carriers' requests to forbear from the ETC facilities requirement to allow them to receive Lifeline support only.¹⁴

III. DISCUSSION

6. The Act requires the Commission to forbear from applying any requirement of the Act or of our regulations to a telecommunications carrier if and only if the Commission determines that: (1) enforcement of the requirement is not necessary to ensure that the charges, practices, classifications, or regulations by, for, or in connection with that telecommunications carrier are just and reasonable and are not unjustly or unreasonably discriminatory; (2) enforcement of that requirement is not necessary for

(continued from previous page) _____
annually thereafter that he or she is the head of household and receives Lifeline-supported service only from that carrier; (6) establish safeguards to prevent its customers from receiving multiple Lifeline subsidies from that carrier at the same address; (7) deal directly with the customer to certify and verify the customer's Lifeline eligibility; and (8) submit to the Wireline Competition Bureau a compliance plan outlining the measures the carrier will take to implement these conditions. *See id.* at 3386–87, 3392, paras. 12, 26; *TracFone Forbearance Order*, 20 FCC Rcd at 15098–99, 15104, paras. 6, 19; *Federal-State Joint Board on Universal Service; TracFone Wireless, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of New York; Petition for Designation as an Eligible Telecommunications Carrier in the State of Florida; Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia; Petition for Designation as an Eligible Telecommunications Carrier in the State of Connecticut; Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Massachusetts; Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama; Petition for Designation as an Eligible Telecommunications Carrier in the State of North Carolina; Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee; Petition for Designation as an Eligible Telecommunications Carrier in the State of Delaware for the Limited Purpose of Offering Lifeline Service to Qualified Households; Petition for Designation as an Eligible Telecommunications Carrier in the State of New Hampshire for the Limited Purpose of Offering Lifeline Service to Qualified Households; Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania for the Limited Purpose of Offering Lifeline Service to Qualified Households; Petition for Designation as an Eligible Telecommunications Carrier in the District of Columbia for the Limited Purpose of Offering Lifeline Service to Qualified Households*, CC Docket No. 96-45, Order, 24 FCC Rcd 3375 (2009) (*TracFone Forbearance Modification Order*).

¹¹ Forbearance Petition at 2.

¹² *See* Forbearance Petition. On June 5, 2009, the Bureau issued a public notice seeking comment on the Forbearance Petition. *Comment Sought on i-wireless, LLC Petition for Forbearance from Eligible Telecommunications Carrier Facilities Requirement*, CC Docket No. 96-45, Public Notice, 24 FCC Rcd 7682 (Wireline Comp. Bur. 2009). Comments on the Forbearance Petition were filed by the National Association of State Utility Consumer Advocates (NASUCA) and the National Emergency Number Association (NENA). Reply comments were filed by NASUCA, i-wireless, and the Pennsylvania Public Utility Commission (Pennsylvania Commission). We interpret i-wireless's petition to request forbearance not only from the statutory facilities requirement, 47 U.S.C. § 214(e)(1)(A), but also from our parallel regulatory requirements, 47 C.F.R. § 54.201(d)(1), (i). We have previously read these requirements to have the same scope and purpose as the statutory provision. *See Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3386–87 n.41.

¹³ Forbearance Petition at 8–13.

¹⁴ Forbearance Petition at 13; *TracFone Forbearance Order*, 20 FCC Rcd at 15098–99, 15104, paras. 6, 19; *Virgin Mobile Forbearance Order*, 24 FCC Rcd 3386–87, 3392, paras. 12, 26.

the protection of consumers; and (3) forbearance from applying that requirement is consistent with the public interest.¹⁵ As in the *TracFone Forbearance Order* and the *Virgin Mobile Forbearance Order*, we examine the facilities requirement from which i-wireless seeks forbearance in light of the statutory goal of providing low-income consumers with access to telecommunications services and in light of the specific programs in which i-wireless seeks to participate. Because our prior orders have laid the path for examining forbearance requests in the context of the Lifeline program, we first evaluate i-wireless's petition in that context. We then turn to the new issue of whether i-wireless has demonstrated that the statutory requirements for forbearance are met in the context of the Link Up program.

A. Forbearance for Lifeline

7. In this section, we evaluate whether i-wireless has met the three-prong statutory test for forbearance to receive Lifeline support. For the reasons provided below, we conditionally grant the request of i-wireless for forbearance from the facilities requirement of section 214(e) for the purpose of seeking ETC designation to provide Lifeline support only.

8. *Just and Reasonable.* As an initial matter, we note that a provision or regulation is “necessary” if there is a strong connection between the requirement and regulatory goal.¹⁶ Section 10(a)(1) of the Act requires that we consider whether enforcement of the facilities-based requirement of section 214(e) for a pure wireless reseller that seeks ETC designation for Lifeline support only is necessary to ensure that the charges, practices, classifications or regulations are just and reasonable and not unjustly or unreasonably discriminatory.¹⁷

9. As the Commission found in the *TracFone Forbearance Order* and the *Virgin Mobile Forbearance Order*, we conclude that the section 214(e) facilities requirement is not necessary to ensure that i-wireless's charges, practices, and classifications are just and reasonable and not unjustly or unreasonably discriminatory where it is providing Lifeline service only.¹⁸ As a reseller, i-wireless is by definition subject to competition. We expect that i-wireless's Lifeline offerings will compete, at a minimum, with the Lifeline offerings of the incumbent wireline carrier in a given geographic area, and potentially, depending on the states where i-wireless seeks ETC designation, with the offerings of TracFone and Virgin Mobile.¹⁹ We also expect that this competition will spur innovation amongst carriers in their Lifeline offerings, expanding the choice of Lifeline products for eligible consumers. For these reasons, we find that the first prong of section 10(a) is met. In the limited context of Lifeline support, the facilities requirement is not necessary to ensure that i-wireless's charges, practices, and classifications are just and reasonable.

10. *Consumer Protection.* Section 10(a)(2) requires that we consider whether enforcement of the facilities-based requirement of section 214(e) for a pure wireless reseller that seeks ETC designation only for Lifeline support is necessary for the protection of consumers. As in the cases of TracFone and Virgin Mobile, we find that imposing the facilities requirement on i-wireless is not necessary for the protection of consumers so long as the carrier complies with the obligations described below. Specifically, we conclude that forbearance from this provision will benefit consumers. Indeed, if i-wireless is ultimately granted limited ETC status, it would be offering Lifeline-eligible consumers an additional choice of providers for accessing telecommunications services. The prepaid feature may be an

¹⁵ 47 U.S.C. § 160(a)–(b). In making a public interest determination, section 10(b) requires the Commission to consider whether forbearance will promote competitive market conditions.

¹⁶ See *CTIA v. FCC*, 330 F.3d 502, 512 (D.C. Cir. 2003).

¹⁷ 47 U.S.C. § 160(a)(1); 47 U.S.C. § 214(e).

¹⁸ See *TracFone Forbearance Order*, 20 FCC Rcd at 15100, para. 12; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3389, para. 20.

¹⁹ See 47 C.F.R. § 54.405(a) (requiring ETCs to offer Lifeline service).

attractive alternative for such consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

11. Given the importance of public safety and in light of the fact that a Lifeline ETC is generally a low-income customer's only connection to the public switched telephone network, however, we condition this grant of forbearance on i-wireless's compliance with certain obligations upon being designated as an ETC, consistent with the public safety obligations previously imposed on TracFone and Virgin Mobile.²⁰ Specifically, our forbearance is conditioned on i-wireless:

- (1) providing its Lifeline customers with 911 and enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes;
- (2) providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service;
- (3) complying with conditions (1) and (2) as of the date it provides Lifeline service; and
- (4) obtaining a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met.

12. The Commission has an obligation to promote "safety of life and property" and to "encourage and facilitate the prompt deployment throughout the United States of a seamless, ubiquitous, and reliable end-to-end infrastructure" for public safety.²¹ The provision of 911 and E911 services is critical to our nation's ability to respond to a host of crises, and this Commission has a longstanding and continuing commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers.²² As we have held previously, we believe these obligations are necessary to ensure that the Lifeline customers of these wireless resellers have meaningful access to emergency services.²³

13. Consistent with the obligations we have placed on TracFone and Virgin Mobile, these obligations apply in any state in which i-wireless becomes an ETC and plans to serve any customers without using its own facilities. Additionally, i-wireless must furnish to the Commission upon request copies of all certifications required by the fourth obligation.²⁴ Furthermore, if i-wireless seeks to use the self-certification option, it may do so only after complying with the following procedures. *First*, i-wireless must request certification from the PSAP and notify the PSAP that the carrier may self-certify compliance if the PSAP has neither provided certification nor made an affirmative finding that the carrier does not provide its customers with access to 911 and E911 service within the PSAP's service area within 90 days of the request. This evaluation period commences upon proper notification.²⁵ The evaluation

²⁰ See *TracFone Forbearance Order*, 20 FCC Rcd at 15101-02, paras. 15-16; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3390-91, paras. 21-23.

²¹ *Applications of Nextel Communications, Inc. and Sprint Corporation For Consent to Transfer Control of Licenses and Authorizations*, WT Docket No. 05-63, Memorandum Opinion and Order, 20 FCC Rcd 13967, 14020, para. 144 (2005).

²² *Id.*

²³ See *TracFone Forbearance Order*, 20 FCC Rcd at 15101-02, paras. 15-16; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3390-91, para. 21-23.

²⁴ See *Virgin Mobile ETC Designation Order*, 24 FCC Rcd at 3390, para. 22.

²⁵ *Id.* at 3390-91, para. 22. Consistent with the *Virgin Mobile Forbearance Order*, in providing notice that it may self-certify, i-wireless must provide a PSAP with all of the information and/or equipment requested by the PSAP in analyzing i-wireless's ability to provide 911 and E911 to its customers.

period is tolled whenever a PSAP reasonably requests information or equipment to evaluate the carrier's request until the carrier responds with that information or equipment.²⁶ If a PSAP determines that the carrier will not offer its Lifeline customers appropriate access to emergency services or has concerns regarding the carrier's ability and if the PSAP notifies the carrier of its concerns during the evaluation period, the evaluation period is extended by an additional 90 days and the carrier may not self-certify compliance until it has addressed the PSAP's concerns.²⁷ *Second*, before self-certifying, the carrier must obtain from its underlying carrier in that area certification that the underlying carrier routes emergency calls from the carrier's customers to the PSAP in the same manner that it routes emergency calls from its own customers.²⁸ *Third*, the carrier must provide the PSAP with a copy of the relevant self-certifications at the time it is effective.²⁹ *Fourth*, if a PSAP finds that i-wireless does not provide its customers with 911 and E911 access after the carrier has self-certified that it does, the carrier must notify the Commission of this finding upon receiving notice and must explain how it plans to meet the PSAP's concerns and provide Lifeline customers with appropriate 911 and E911 access.³⁰

14. Accordingly, we find that, subject to the 911 and E911 conditions and the self-certification and other conditions set out above, and consistent with the Commission's grant of forbearance to TracFone and Virgin Mobile, the ETC facilities-based requirement is not necessary for consumer protection with respect to i-wireless's receipt of Lifeline support only. We therefore conclude that the second element of section 10(a) is satisfied.

15. *Public Interest.* Section 10(a)(3) requires that we consider whether enforcement of the facilities-based requirement of section 214(e) for a pure wireless reseller that seeks ETC designation for Lifeline support only is in the public interest. In evaluating whether forbearance is in the public interest, we follow the path we laid out in the *TracFone Forbearance Order* and the *Virgin Mobile Forbearance Order*. We note first that the Commission's traditional concern with a carrier doubling its recovery by reselling facilities that are already supported by the high-cost fund does not apply in the low-income context.³¹ We also note that Lifeline support is designed to reduce the monthly cost of telecommunications service for qualifying low-income consumers and is directly reflected in the price that the low-income customer pays.³² Requiring a Lifeline provider to own the facilities it uses to offer service does not necessarily further the statutory goal of the low-income program.³³ In accordance with our forbearance grants to TracFone and Virgin Mobile, we find that the public interest is served by forbearing from the facilities requirement in section 214(e) to allow i-wireless to receive Lifeline support.³⁴

²⁶ *Id.* at 3391, para. 22.

²⁷ *Id.* at 3390 n.67.

²⁸ *Id.* at 3391, para. 22. Like other certifications, the carrier is required to retain these underlying carrier certifications and provide them to the Commission upon request.

²⁹ *Id.*

³⁰ *Id.*

³¹ See *TracFone Forbearance Order*, 20 FCC Rcd at 15100-01, para. 12; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3389, para. 18.

³² 47 C.F.R. §§ 54.401, 54.504.

³³ See *TracFone Forbearance Order*, 20 FCC Rcd at 15104-05, para. 23; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3393, para. 29.

³⁴ See *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3392-93, para. 27 (“[W]e do not believe that similar requests will have a detrimental impact on the fund. We note that to the extent any similarly situated prepaid wireless reseller seeks forbearance from these requirements for the purpose of providing only Lifeline support, it (continued . . .)

16. Continued growth of the universal service fund has highlighted in recent years the importance of the Commission's continued commitment to fight waste, fraud, and abuse. Accordingly, in addition to the consumer protection conditions outlined above and consistent with obligations imposed on TracFone and Virgin Mobile, we find that it is necessary to require i-wireless to assume additional obligations designed to protect against waste, fraud, and abuse.³⁵ Specifically, we condition our forbearance from the facilities requirement on i-wireless:

- (5) requiring each customer to self-certify at time of service activation and annually thereafter that he or she is the head of household and receives Lifeline-supported service only from that carrier;
- (6) establishing safeguards to prevent its customers from receiving multiple Lifeline subsidies from that carrier at the same address;
- (7) dealing directly with the customer to certify and verify the customer's Lifeline eligibility; and
- (8) submitting to the Wireline Competition Bureau a compliance plan outlining the measures the carrier will take to implement the obligations contained in this order within 30 days of the effective date of this order.

17. As we have held previously, we believe these obligations are necessary safeguards to help deter waste, fraud, and abuse.³⁶ These obligations apply in any state in which i-wireless becomes an ETC and plans to serve any customers without using its own facilities. Consistent with the obligations we have placed on TracFone and Virgin Mobile, we require i-wireless to clearly state the penalties for perjury on the self-certification form it uses to comply with the fifth obligation and to monitor compliance of its customers' self-certifications by retaining those self-certifications and providing them, as well as documentation of how the carrier obtained the certification, to the Commission upon request.³⁷

18. We disagree with parties that argue that we should condition our forbearance on i-wireless complying with additional obligations, such as offering a particular usage package or complying with state-level 911 and E911 obligations.³⁸ We believe it is appropriate to leave those assessments to whichever commissions will rule on i-wireless's petitions for designation as an ETC. A state commission is generally in a better position than we to assess whether a particular offering will benefit that state's low-income consumers and to determine whether it is necessary to condition ETC designation on compliance with state-level 911 and E911 obligations.³⁹ We therefore encourage parties arguing for

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will be expected to comply with all the conditions we imposed upon TracFone, which Virgin Mobile has agreed to do.”).

³⁵ See *TracFone Forbearance Order*, 20 FCC Rcd at 15103-04, 15105, paras. 18, 25; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3392, para. 25.

³⁶ These obligations are in addition to, and do not supplant, the certification and verification eligibility already required by our rules for federal default states and any similar state rules for the non-federal default states. See, e.g., 47 C.F.R. § 54.410. On May 4, 2010, the Commission asked the Federal-State Joint Board on Universal Service to review the Commission's eligibility, verification, and outreach rules for the Lifeline and Link Up universal service programs. See *Federal-State Joint Board on Universal Service; Lifeline and Link Up*, CC Docket No. 96-45, WC Docket No. 03-109, Order, 25 FCC Rcd 5079 (2010).

³⁷ See *TracFone Forbearance Order*, 20 FCC Rcd at 15103-04, 15105, paras. 18, 25; *Virgin Mobile Forbearance Order*, 24 FCC Rcd at 3392, para. 25 & n.74.

³⁸ See, e.g., NASUCA Comments at 4-5 (arguing that forbearance is inappropriate unless i-wireless explains how it will apply the Lifeline discount to its plans); NENA Comments at 1-2 (arguing that carriers seeking forbearance should commit to complying with state-level 911 and E911 obligations as a condition of forbearance).

³⁹ Of course, if a state commission does not have jurisdiction to designate i-wireless as a limited-purpose ETC, we will consider i-wireless's application as well as whether any additional obligations are necessary for that particular designation to be in the public interest. See 47 U.S.C. § 214(c)(6).

additional obligations to redirect their arguments to ETC designation proceedings rather than this proceeding.

19. Similarly, we are not persuaded by comments regarding the impact on the size of the universal service fund and the associated contribution obligation if we grant the forbearance petition.⁴⁰ Granting forbearance here would allow i-wireless to compete with TracFone and Virgin Mobile (as well as other ETCs) for the existing pool of low-income customers, and the size of that pool is determined by Lifeline program eligibility requirements, not by the number of providers competing for those customers. The additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest. A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline program outweighs the potential costs.⁴¹

20. In conclusion, we find that conditionally granting i-wireless forbearance for purposes of seeking ETC designation to participate in the Lifeline program only will further the statutory goal of providing low-income subscribers access to telecommunications and emergency services, while protecting the universal service fund against waste, fraud, and abuse.⁴² To the extent, however, that our predictive judgment proves incorrect and these conditions prove to be inadequate safeguards, parties may file appropriate petitions with the Commission and we have the option of reconsidering this forbearance ruling.⁴³

B. Forbearance for Link Up

21. We decline to grant the request of i-wireless for forbearance from the facilities requirement for the purpose of seeking ETC designation to receive Link Up support.⁴⁴ Petitioners seeking forbearance bear the burden of proof and must show that each of the statutory elements of forbearance is met.⁴⁵ i-wireless has not done so in the context of the Link Up program. Specifically, i-wireless does not

⁴⁰ See Pennsylvania Commission Reply at 5–6.

⁴¹ For example, Virgin Mobile (the second wireless reseller to receive forbearance) has recently increased the number of minutes it offers to low-income consumers through its Lifeline product to attract more customers. Compare, e.g., Pennsylvania Commission Reply, CC Docket No. 96-45, at 6 n.16 (filed July 20, 2009) (noting that Virgin Mobile planned to offer 120 free prepaid minutes to Lifeline customers), with Virgin Mobile Petition for Limited Designation as an Eligible Telecommunications Carrier in the State of Alabama, WC Docket No. 09-197, at 8 (filed Jan. 15, 2010) (noting that Virgin Mobile plans to offer 200 free prepaid minutes to its Lifeline customers).

⁴² i-wireless has committed to complying with all the obligations imposed on TracFone and Virgin Mobile as conditions of forbearance. See Forbearance Petition at 13.

⁴³ See *Petition for Forbearance of the Verizon Telephone Companies Pursuant to 47 U.S.C. § 160(c)*, WC Docket No. 01-338, Memorandum Opinion and Order, 19 FCC Rcd 21496, 21508–09, para. 26 & n.85 (2004); see also *Petition of SBC Communications Inc. for Forbearance from Structural Separations Requirements of Section 272 of the Communications Act of 1934, As Amended, and Request for Relief to Provide International Directory Assistance Services*, CC Docket No. 97-172, Memorandum Opinion and Order, 19 FCC Rcd 5211, 5223–24, para. 19 & n.66 (2004); *Cellnet Communications, Inc. v. FCC*, 149 F.3d 429, 442 (6th Cir. 1998).

⁴⁴ See Forbearance Petition at 8–14.

⁴⁵ See, e.g., *Petition to Establish Procedural Requirements to Govern Proceedings for Forbearance under Section 10 of the Communications Act of 1934, As Amended*, WC Docket No. 07-267, Report and Order, 24 FCC Rcd 9543, 9554–55, para. 20 (2009) (“We now state explicitly that the burden of proof is on forbearance petitioners at the outset and throughout the proceeding.”); *Petitions of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas*, WC Docket No. 07-97, Memorandum Opinion and Order, 23 FCC Rcd 11729, 11750, 11754–58, paras. 28, 36, 39 (2008) (noting that Qwest had failed to meet its burden of persuasion regarding sufficiency of market share).

address in its petition the differences between the Lifeline and Link Up programs, nor does the company explain how the obligations conditional to Lifeline participation would apply in the context of Link Up. Moreover, i-wireless does not explain how the public interest would be served by forbearing from the facilities requirement in this context.⁴⁶ General references to the statutory goal of ensuring that low-income consumers have access to telecommunications services do not suffice to replace a particularized argument regarding the facts and policy surrounding the facilities requirement and the Link Up program.⁴⁷ We thus conclude that i-wireless has failed to meet its burden to show that forbearing from the facilities requirement in the context of the Link Up program is in the public interest.⁴⁸

IV. ORDERING CLAUSES

22. Accordingly, IT IS ORDERED that, pursuant to the authority contained in sections 4(i), 4(j), 10, 214, and 254 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 214, 254, the petition for forbearance filed by i-wireless Telecom, LLC IS GRANTED IN PART to the extent discussed herein and conditioned on fulfillment of the obligations set forth in this order and otherwise DENIED.

23. IT IS FURTHER ORDERED that, pursuant to the authority contained in sections 4(i), 4(j), 10, 214, and 254 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 214, 254, we forbear from applying sections 54.201(d)(1) and 54.201(i) of the Commission's rules, 47 C.F.R. § 54.201(d)(1), (i), to i-wireless Telecom, LLC to the extent discussed herein and conditioned on fulfillment of the obligations set forth in this order.

24. IT IS FURTHER ORDERED that, pursuant to section 1.103(a) of the Commission's rules, 47 C.F.R. § 1.103(a), this order SHALL BE effective upon release.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

⁴⁶ See Forbearance Petition at 8–14 (discussing Link Up only in the context of its discussion of Lifeline).

⁴⁷ See *Amendment of the Commission's Rules Concerning Maritime Communications*, PR Docket No. 92-257, Third Report and Order and Memorandum Opinion and Order, 13 FCC Rcd 19853, 19879–80, para. 55 (1998) (“MariTEL’s request cannot be granted because it is too vague, both as to the specific provisions from which we should forbear from enforcing, and as to why forbearance would be in the public interest.”).

⁴⁸ Because we find that i-wireless has not met its burden of proof on the third statutory element, we do not examine whether it did so on the first or second elements.

EXHIBIT 4

i-wireless Compliance Plan

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

In the Matter of the)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A))	

I-WIRELESS, LLC'S COMPLIANCE PLAN

i-wireless, LLC (“i-wireless” or the “Company”), by its attorney, hereby files its plan outlining the measures it will take to implement the conditions imposed by the Federal Communications Commission (“Commission”) in its recent Order, released June 25, 2010, in the above-captioned matter¹. Given the severe economic environment that is forcing many lower-income customers to forego wireless service, i-wireless respectfully requests expeditious approval of this plan so that the Company, upon designation as an Eligible Telecommunications Carrier (“ETC”), may quickly deploy much-needed Lifeline services to many low-income customers.

BACKGROUND

The Commission’s *Order* conditionally granted i-wireless’ request for forbearance from the Section 214(e)(1)(A) requirement that a carrier designated as an ETC for purposes of federal universal service support provide services, at least in part, over its own facilities, stating “i-wireless may seek ETC designation to offer discounted services to qualified low-income consumers through the universal service Lifeline program².” The petition for forbearance was denied for the purposes of participating in the Link Up program.

The Commission found that a conditional grant of forbearance for i-wireless from the facilities requirement of section 214(e) for the purpose of seeking ETC designation to provide Lifeline support only “will further the statutory goal of providing low-income subscribers access to

¹ See *Federal-State Joint Board on Universal Service; In the Matter of i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, FCC 10-117, released June 25, 2010 (“*Order*”).

² *Order* at ¶ 1.

telecommunications and emergency services, while protecting the universal service fund against waste, fraud and abuse³.” The Commission’s grant of forbearance is subject to the following conditions: (a) i-wireless providing its Lifeline customers with 911 and Enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (b) i-wireless providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) i-wireless complying with conditions (a) and (b) as of the date it provides Lifeline service; and (d) i-wireless obtaining a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met; (e) i-wireless requiring each customer to self-certify at time of service activation and annually thereafter that he or she is the head of household and receives Lifeline-supported service only from i-wireless; (f) i-wireless establishing safeguards to prevent its customers from receiving multiple Lifeline subsidies from i-wireless at the same address; and (g) i-wireless dealing directly with the customer to certify and verify the customer’s Lifeline eligibility⁴. The Commission required i-wireless to submit a plan describing the measures it would take to implement each one of these conditions within thirty days of the release of the Order⁵.

COMPLIANCE PLAN

i-wireless commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers⁶. i-wireless will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.

I. Access to 911 and E911 Services

In the *Order*, the Commission required i-wireless to provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service, and stated that, in order to demonstrate compliance with the condition, i-wireless must obtain certification from each PSAP

³ *Order* at ¶ 20.

⁴ *See Order* at ¶¶ 11, 16.

⁵ *See id.*

⁶ *See Order* at ¶ 12.

where it provides Lifeline service confirming that its customers receive 911 and E911 services. If within 90 days of i-wireless' request, a PSAP has neither provided the certification nor made an affirmative finding that the Company does not provide its customers with 911 and E911 services within the applicable service area, the *Order* allowed i-wireless to self-certify that it meets the requirements⁷. The Commission and consumers are hereby assured that all i-wireless customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from i-wireless handsets, even if the account associated with the handset has no minutes remaining.

i-wireless can ensure the Commission that all Lifeline customers will have meaningful access to emergency calling services at the time the customer activates Lifeline service, and that such access will continue regardless of the customer's account status or the availability of prepaid minutes. The Company's existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying carrier, Sprint Nextel ("Sprint"). i-wireless also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

To satisfy the conditions of the *Order* regarding 911 and E911 services, i-wireless will implement the following measure prior to deploying Lifeline services in a given area. Initially, the Company will confirm that its underlying carrier has deployed E911 services in a specific PSAP territory. i-wireless will obtain the requisite certification from each PSAP where it provides Lifeline service confirming that its customers receive 911 and E911 services⁸. If within 90 days of receiving the Company's request, a PSAP has neither provided such certification nor made an affirmative finding that the Company does not provide its customers with 911 and E911 services within the applicable service area, i-wireless will self-certify that it meets the basic and E911 requirements.

II. E911-Compliant Handsets

The Commission also conditioned its grant of forbearance determination on i-wireless providing only E911-compliant handsets to its Lifeline customers⁹. i-wireless will ensure that all

⁷ See *Order* at ¶ 13.

⁸ A form of this PSAP certification request is attached hereto as Exhibit A.

⁹ See *Order* at ¶ 11.

handsets used in connection with the Lifeline service offering will be E911-compliant. In fact, i-wireless' phones have always been and will continue to be 911 and E911-compliant. i-wireless uses phones from Sprint that have been through a stringent certification process in Sprint's handset certification lab, which ensures that the handset models used meet all 911 and E911 requirements. In i-wireless' four year history, only one handset model has failed the E911 process during the handset lab certification, and that is a model the Company did not launch. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Furthermore, in the event that an existing customer does not have an E911-compliant handset, the Company will replace it with a new 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

III. Certification of Lifeline Customers' Eligibility

To safeguard against misuse of the Lifeline service plan, the *Order* required i-wireless to deal directly with the customer and require each customer to self-certify under penalty of perjury at time of service activation and annually thereafter that they are the head of household and receive Lifeline-supported service only from i-wireless¹⁰. The Commission also required i-wireless to establish safeguards to prohibit more than one supported i-wireless service at each residential address¹¹. i-wireless proposes the following plan to implement these certification and verification conditions:

A. Policy

i-wireless will comply with all certification and verification requirements for Lifeline eligibility established by states where it is designated as an ETC. In states where there are no state-imposed requirements, i-wireless will comply with the certification and verification procedures in effect in that state as reflected on the website of the Universal Service Administration Company. However, for any states which do not mandate Lifeline support and/or which do not have established rules of procedure in place, i-wireless will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements.

¹⁰ See *Order* at 16.

¹¹ See *id.*

B. Certification Procedures

i-wireless will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting i-wireless via telephone, facsimile, or the internet. At the point of sale, consumers will be provided with printed information describing i-wireless' Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers will be directed to a toll-free telephone number and to i-wireless' website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. i-wireless understands and accepts the Commission's requirement that the Company have direct contact with all customers applying for participation in the Lifeline program¹². Retailers will have no role in the Lifeline application process, other than to provide customers with printed information regarding the program.

Consumers will be required to call a toll-free number to complete an application over the phone. The application will then be mailed to the customer for signature under penalty of perjury and for the submission of supporting documentation. The signed application and support documentation must be mailed to the address provided by the Company. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under i-wireless' supervision by managers experienced in the administration of the Lifeline program.

i-wireless will insure that all required documentation is taken care of properly by using state-specific compliance checklists. In addition, the Lifeline application form will include a certification section where the applicant must attest and sign under penalty of perjury that the applicant meets the relevant eligibility criteria. For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate. For states with income-based eligibility criteria, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (*e.g.*, 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide proof of income-based eligibility. Applicants will also be required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from i-wireless. Penalties for perjury will be clearly-stated on the certification form, as

¹² See *Order* at ¶ 16.

required by the *Order*¹³.

Finally, the application forms will require each applicant to provide their name, primary residential address and an alternate telephone number (if any). i-wireless will incorporate this information into its customer information database. The Company will check the name and address of each Lifeline applicant against its database to determine whether or not it is associated with a customer that already receives i-wireless Lifeline service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with the address. i-wireless will deny the Lifeline application of any such individual and advise the applicant of the basis for the denial. i-wireless shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent i-wireless customers from engaging in such abuse of the program.

C. Verification Procedures

As required by the Commission's *Order*, i-wireless 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 i-wireless¹⁴. i-wireless will notify each participating Lifeline consumer on the anniversary of their enrollment that they must confirm their continued eligibility in accordance with the applicable requirements. Such verification will be required in order for the consumer to continue to purchase prepaid airtime from i-wireless at the discounted rate only available to those customers who are enrolled in its Lifeline program.

¹³ See *Order* at ¶ 17.

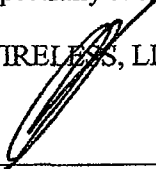
¹⁴ See *Order* at ¶ 16.

CONCLUSION

i-wireless submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Order* granting forbearance to the Company. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, i-wireless respectfully requests that the Commission expeditiously approve its Compliance Plan so that i-wireless may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

I-WIRELESS, LLC



Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005
(770) 232-9200

Its Counsel

Dated July 26, 2010

EXHIBIT A

PSAP CERTIFICATION REQUEST

[Date]

Public Safety Answering Point Coordinator
[Address]

Re: Request for PSAP Certification for Lifeline Participation

Dear PSAP Coordinator:

This is to inform you that i-wireless, LLC (“i-wireless”), has been designated an Eligible Telecommunications Carrier (“ETC”) by the Federal Communications Commission (“FCC”) for the purpose of offering reduced-cost service to low-income customers in the state of [State] under the federal Lifeline program. (See attached FCC Order _____ released _____.)

Lifeline ensures that low-income customers have access to quality telephone service at a reasonable, affordable rate, and i-wireless is pleased to be among the wireless carriers offering Lifeline service to low-income customers, particularly during this difficult economic environment.

The FCC’s approval for i-wireless to offer Lifeline service was conditional upon the following requirements: (1) offer 911 and enhanced 911 (E911) access immediately upon activation of service, and (2) provide its new Lifeline customers with E911-compliant handsets and replace, at no additional charge to the customer, noncompliant handsets of existing customers who subscribe to Lifeline service. The FCC further required that i-wireless seek certification from each Public Safety Answering Point (“PSAP”) where i-wireless intends to offer Lifeline service confirming that i-wireless provides its customers with 911 and E911 access. i-wireless is seeking this certification from your PSAP based on the information provided in this letter and any additional information you may request.

i-wireless’ wireless services operate on the Sprint Nextel (“Sprint”) network. As you may be aware, Sprint has completed the deployment of facilities necessary to offer Phase I and/or II E911 services in your service area, providing Sprint and i-wireless customers with 911 and E911 access. i-wireless’ Lifeline customers will enjoy this same access to 911 and E911 service once activated for service, regardless of activation status or availability of prepaid airtime. As required by the FCC, all i-wireless handsets will comply with applicable federal requirements governing the provision of 911 and E911 service. i-wireless will provide new Lifeline customers with E911-compliant handsets and, for existing customers who subscribe to Lifeline service, will verify that their handsets are E911-compliant or replace the handset at no charge to the customer.

For your convenience, enclosed is a certification form for your review and signature as PSAP Coordinator. Please return the signed certification form in the self-addressed stamped envelope. As required by the FCC, i-wireless will keep the certification on file in the event the FCC seeks to review this documentation. **If within 90 days of receipt of this letter, you do not provide the certification or make an affirmative finding that i-wireless does not provide its customers with 911 and E911 service in your area, i-wireless is permitted to self-certify compliance with the requirements for 911 and E911 access for this PSAP.** (See FCC Order _____ at para. ____.)

Should you have any questions about the foregoing, please contact us at pat.mcdonough@iwirelesshome.com. Please be sure to include your name and address in the email.

Thank you in advance for your cooperation and for enabling i-wireless to offer Lifeline service to low-income customers in your PSAP jurisdiction.

Sincerely,

i-wireless, LLC

**i-wireless Lifeline Program
PSAP Certification Form**



State of _____

PSAP Name: _____

PSAP Coordinator Name: _____

Business Address: _____

PSAP Jurisdiction Description: _____

In my capacity as the Coordinator for the Public Safety Answering Point ("PSAP") described above, I am responsible for the implementation of 911 and Enhanced 911 ("E911") service in accordance with the rules and regulations of the Federal Communications Commission ("FCC").

I have been informed by i-wireless, LLC ("i-wireless") that, by Order dated _____, the FCC has designated i-wireless as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (47 U.S.C. § 214(e)(6)), for the limited purpose of providing Lifeline service in [State], among other states. I have further been informed that the FCC's designation of i-wireless as an ETC is subject to certain conditions, including a condition that i-wireless must obtain certification from each PSAP where it will offer Lifeline service that i-wireless customers will have 911 and E911 access immediately upon activation of service.

In connection with its request for certification by the PSAP, i-wireless has provided certain information. I have been informed by i-wireless that its wireless service operates on the Sprint Nextel ("Sprint") network. i-wireless has indicated that its Lifeline customers will have the same access to 911 and E911 service as the retail customers of Sprint. In addition, i-wireless has represented that its Lifeline handsets will comply with the FCC Order requiring that the handsets be capable of accessing 911 and E911 service regardless of activation status or availability of prepaid airtime.

Upon information and belief, in my capacity as PSAP Coordinator, I hereby certify that i-wireless has provided evidence that it is complying with the FCC requirement that it provide customers with access to basic and E911 service immediately upon activation of Lifeline service.

Dated:

Signature of PSAP Coordinator

EXHIBIT 5

Sample Advertisements

(to be filed in a supplemental pleading the week of May 23, 2011)

EXHIBIT 6

2009 Lifeline Participation Rates by State and FCC News Release

(Lifeline Participation Rates to be filed in a supplemental pleading the week of May 23, 2011)



NEWS

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

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

This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action.
See MCI v. FCC, 515 F.2d 365 (D.C. Cir. 1974).

FOR IMMEDIATE RELEASE:
September 14, 2009

NEWS MEDIA CONTACT:
Rosemary Kimball (202) 418-0511
Email: rosemary.kimball@fcc.gov

FCC SUPPORTS "NATIONAL LIFELINE AND LINK UP TELEPHONE DISCOUNT AWARENESS WEEK" - SEPTEMBER 14 - 20, 2009

WASHINGTON, DC -- Today, the Federal Communications Commission (FCC) joined the effort to call attention to the "National Lifeline and Link Up Telephone Discount Awareness Week," which takes place September 14 - 20, 2009. Various state and local agencies throughout the country will be participating with outreach activities and events. The "Lifeline" and "Link Up" programs provide financial assistance to low-income consumers in connecting a residential phone line and paying their monthly bill. The programs have been active for years and are administered by the FCC and state public utility commissions, but at least half of eligible consumers nationwide do not take advantage of this assistance.

"Lifeline" involves discounts on monthly charges for a primary residential telephone line, including wireless service. "Link Up" involves a discount on the cost of initiating the primary telephone service for a residence, including the activation of a wireless phone that serves as the primary residential telephone. The discounts are available throughout the country, including an enhanced discount on Tribal lands. In general, consumers at or below 135% of the federal poverty guidelines, or who participate in one or more of a number of other assistance programs, are eligible for Lifeline and Link Up.

To help call attention to the availability of these programs, the FCC joins the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA), and urges government agencies and non-profit organizations to help disseminate information on Lifeline and Link Up to their constituents. More information about the programs and how to apply is available at www.lifeline.gov or <http://www.usac.org/li/low-income/apply-for-support.aspx>.

-- FCC --

EXHIBIT 7

Wire Centers

<u>CLLI</u>	<u>Wire Center</u>	<u>Company</u>
Almamoxa	Alma	Alma Communications Co.
Adrnmoxa	Adrian	AT&T Missouri
Advnmora	Advance	AT&T Missouri
Agncmoal	Agency	AT&T Missouri
Frhnmota	Altenburg-Frohna	AT&T Missouri
Antomox50	Antonia	AT&T Missouri
Archmoax	Archie	AT&T Missouri
Argymoa	Argyle	AT&T Missouri
Armsmocr	Armstrong	AT&T Missouri
Asgvmoor	Ash Grove	AT&T Missouri
Buftmohu	Beaufort	AT&T Missouri
Blxymore	Bell City	AT&T Missouri
Kscymo40	Belton	AT&T Missouri
Bntnmoki	Benton	AT&T Missouri
Blngmomy	Billings	AT&T Missouri
Bsmrmope	Bismarck	AT&T Missouri
Blfdmolo	Bloomfield	AT&T Missouri
Bldlmogu	Bloomsdale	AT&T Missouri
Blspmoca	Blue Springs	AT&T Missouri
Byvlarpo	Blytheville	AT&T Missouri
Bntrmofl	Bonne terre	AT&T Missouri
Bnvlmotu	Boonville	AT&T Missouri
Bwlgmoea	Bowling Green	AT&T Missouri
Stlsmo20	Bridgeton	AT&T Missouri
Stlsmo42	Bridgeton	AT&T Missouri
Brrfdmocl	Brookfield	AT&T Missouri
Cmtnmodi	Camdenton	AT&T Missouri
Cmtnmono	Camdenton	AT&T Missouri
Cmpbmoch	Campbell	AT&T Missouri
Knntmobu	Campbell	AT&T Missouri
Cpgrmoed	Cape Girardeau	AT&T Missouri
Cdwlmoool	Cardwell	AT&T Missouri
Crjtmomi	Carl Junction	AT&T Missouri
Crthmofl	Carthage	AT&T Missouri
Ctvlmoed	Caruthersville	AT&T Missouri
Cdhlmo51	Cedar Hill	AT&T Missouri
Cntrmoam	Center	AT&T Missouri
Chffmotu	Chaffee	AT&T Missouri
Chtnmomu	Charleston	AT&T Missouri
Chfdmo52	Chesterfield	AT&T Missouri
Chlcmomi	Chillicothe	AT&T Missouri
Clvlmoci	Clarksville	AT&T Missouri
Clvrmolu	Clever	AT&T Missouri
Clspmofi	Climax Springs	AT&T Missouri
Clspmono	Climax Springs	AT&T Missouri
Destmogi	De Soto	AT&T Missouri

Drngmopl	Deering	AT&T Missouri
Deltmosw	Delta	AT&T Missouri
Dxtrmoma	Dexter	AT&T Missouri
Dwngmofr	Downing	AT&T Missouri
Atsnkssf	E Atchison	AT&T Missouri
Ftsckso1	E Fort Scott	AT&T Missouri
Psbgkslo	E pittsburg	AT&T Missouri
Eprrmoni	E Prairie	AT&T Missouri
Lvwokssh	East Leavenworth Lansing	AT&T Missouri
Edinmoex	Edina	AT&T Missouri
Eldnmoex	Eldon	AT&T Missouri
Elsbmotw	Elsberry	AT&T Missouri
Essxmoav	Essex	AT&T Missouri
Eurkmo53	Eureka	AT&T Missouri
Exspmome	Excelsior Springs	AT&T Missouri
Frgvmopl	Fair Grove	AT&T Missouri
Kscymo23	Farley	AT&T Missouri
Frtnmopl	Farmington	AT&T Missouri
Fyttmoch	Fayette	AT&T Missouri
Fntnmo54	Fenton	AT&T Missouri
Fstsmoye	Festus-Crystal City	AT&T Missouri
Fiskmowo	Fisk	AT&T Missouri
Ppblmosu	Fisk	AT&T Missouri
Flrvmoge	Flat River	AT&T Missouri
Frfrmost	Frankford	AT&T Missouri
Frtwmost	Fredericktown	AT&T Missouri
Fltnmomi	Fulton	AT&T Missouri
Gidnmohi	Gideon	AT&T Missouri
Kscymo20	Gladstone	AT&T Missouri
Grmlmofr	Gravois Mills	AT&T Missouri
Snbhmofr	Gravois Mills	AT&T Missouri
Grsmmo55	Gray summit	AT&T Missouri
Hnblmoac	Hannibal	AT&T Missouri
Hvtrmo67	Harvester	AT&T Missouri
Haytmofle	Hayti	AT&T Missouri
Pvlymoaa	Herculaneum-Pevely	AT&T Missouri
Higbmogl	Higbee	AT&T Missouri
Hrgmo56	High Ridge	AT&T Missouri
Hrgmo57	High Ridge	AT&T Missouri
Hlbomo66	Hillsboro	AT&T Missouri
Hlcmm05sw	Holcomb	AT&T Missouri
Hrnvmope	Hornersville	AT&T Missouri
Imprmo58	Imperial	AT&T Missouri
Kscymo22	Independence	AT&T Missouri
Kscymo44	Independence	AT&T Missouri
Kscymo48	Independence	AT&T Missouri
Jcsnmoci	Jackson	AT&T Missouri

Jsprmoex	Jasper	AT&T Missouri
Jplnmoma	Joplin	AT&T Missouri
Spfdmomc	Joplin	AT&T Missouri
Kscymo01	Kansas City	AT&T Missouri
Kscymo02	Kansas City	AT&T Missouri
Kscymo04	Kansas City	AT&T Missouri
Kscymo05	Kansas City	AT&T Missouri
Kscymo21	Kansas City	AT&T Missouri
Kscymo45	Kansas City	AT&T Missouri
Stlsmo41	Kirkwood	AT&T Missouri
Knnsmolo	Knob noster	AT&T Missouri
Lamtmodi	La Monte	AT&T Missouri
Stlsmo40	Ladue	AT&T Missouri
Stlsmo43	Ladue	AT&T Missouri
Stchmo63	Ladue	AT&T Missouri
Stlsmo01	Ladue	AT&T Missouri
Stlsmo21	Ladue	AT&T Missouri
Stlsmo22	Ladue	AT&T Missouri
Stlsm026	Ladue	AT&T Missouri
Stlsmo27	Ladue	AT&T Missouri
Lkozmoen	Lake Ozark-Osage Beach	AT&T Missouri
Osbhmofi	Lake Ozark-Osage Beach	AT&T Missouri
Lamrmoov	Lamar	AT&T Missouri
Lncsmogl	Lancaster	AT&T Missouri
Ldwdmolo	Leadwood	AT&T Missouri
Kscymo41	Lees summit	AT&T Missouri
Kscymo42	Liberty	AT&T Missouri
Llbrmoov	Lilbourn	AT&T Missouri
Linnmotw	Linn	AT&T Missouri
Lcwdmoce	Lockwood	AT&T Missouri
Losnmosk	Louisiana	AT&T Missouri
Mldnmocr	Malden	AT&T Missouri
Mnchmo59	Manchester	AT&T Missouri
Mrhlmobe	Marble hill	AT&T Missouri
Mrclmoch	Marceline	AT&T Missouri
Mrnvmoho	Marionville	AT&T Missouri
Kscymo55	Marshall	AT&T Missouri
Mrshmoga	Marshall	AT&T Missouri
Mrtmmoni	Marston	AT&T Missouri
Mxvlmo60	Maxville	AT&T Missouri
Metamoba	Meta	AT&T Missouri
Mexcmoju	Mexico	AT&T Missouri
Mbrlmoam	Moberly	AT&T Missouri
Mnttmobe	Monett	AT&T Missouri
Mtcymolo	Montgomery City	AT&T Missouri
Mrhsmono	Morehouse	AT&T Missouri
Neshmogle	Neosho	AT&T Missouri

Nevdmono	Nevada	AT&T Missouri
Nwfrmovi	New franklin	AT&T Missouri
Nwmdmosh	New Madrid	AT&T Missouri
Nixamoa	Nixa	AT&T Missouri
Okrgmoam	Oak Ridge	AT&T Missouri
Olapmost	Old appleton	AT&T Missouri
Oranmoco	Oran	AT&T Missouri
Stlsm023	Overland	AT&T Missouri
Pcfcmo61	Pacific	AT&T Missouri
Patnmoto	Patton	AT&T Missouri
Pyvlmoti	Paynesville	AT&T Missouri
Prvlmoli	Perryville	AT&T Missouri
Skstmogr	Perryville	AT&T Missouri
Pchnmote	Pocahontas	AT&T Missouri
Pondmo62	Pond	AT&T Missouri
Pgvlmodr	Portageville	AT&T Missouri
Prsxmo68	Portage Des Sioux	AT&T Missouri
Qulnmofa	Qulin	AT&T Missouri
Kscymo24	Raytown	AT&T Missouri
Rpblmope	Republic	AT&T Missouri
Rcmdmopr	Richmond	AT&T Missouri
Rcwdmoor	Richwoods	AT&T Missouri
Riscmoex	Risco	AT&T Missouri
Stlsmo24	Riverview	AT&T Missouri
Rrvlmopl	Rogersville	AT&T Missouri
Ruvlmora	Rushville	AT&T Missouri
Snanmomo	San antonio	AT&T Missouri
Stlsmo25	Sappington	AT&T Missouri
Scsymoco	Scott City	AT&T Missouri
Sdlimota	Sedalia	AT&T Missouri
Sentmore	Senath	AT&T Missouri
Sltrmola	Slater	AT&T Missouri
Smlmotr	Smithville	AT&T Missouri
Kscymo25	So kansas city	AT&T Missouri
Stlsm045	Spanish Lake	AT&T Missouri
Spfdmote	Springfld	AT&T Missouri
Spfdmotu	Springfld	AT&T Missouri
Stclmoma	St Clair	AT&T Missouri
Stjsmodj	St Joseph	AT&T Missouri
Stjsmomd	St Joseph	AT&T Missouri
Stlsmo02	St Louis	AT&T Missouri
Stlsmo03	St Louis	AT&T Missouri
Stlsmo04	St Louis	AT&T Missouri
Stlsmo05	St Louis	AT&T Missouri
Stlsmo06	St Louis	AT&T Missouri
stlsmo07	St Louis	AT&T Missouri
Stlsmo08	St Louis	AT&T Missouri

Stlsmo11	St Louis	AT&T Missouri
Stmymoli	St Marys	AT&T Missouri
Stjsmodn	St. Joseph	AT&T Missouri
Stnbmosu	Stanberry	AT&T Missouri
Stfrmore	Strafford	AT&T Missouri
Trenmoel	Trenton	AT&T Missouri
Tscmmoem	Tuscumbia	AT&T Missouri
Unimolu	Union	AT&T Missouri
Vypkmo64	Valley park	AT&T Missouri
Vrslmodr	Versailles	AT&T Missouri
Vinnmoga	Vienna	AT&T Missouri
Wlgvmowy	Walnut Grove	AT&T Missouri
Wardmoma	Wardell	AT&T Missouri
Waremowh	Ware	AT&T Missouri
Washmobe	Washington	AT&T Missouri
Wbcymoor	Webb City	AT&T Missouri
Wdspmo01	Harvester	AT&T Missouri
Wlvlmomu	Wellsville	AT&T Missouri
Wphlmogle	Westphalia	AT&T Missouri
Wlrdmosh	Willard	AT&T Missouri
Wyttmoor	Wyatt	AT&T Missouri
Parmmoxa	Parma	BPS Telephone
Stelmoxa	Steele	BPS Telephone
Bernmoxa	Bernie	BPS Telephone
Clevmoxa	Cleveland	Cass County Telephone
Cgtnmoxa	Creighton	Cass County Telephone
Drxlmoxa	Drexel	Cass County Telephone
Elynmoxa	East Lynne	Cass County Telephone
Grcymoxa	Gardencity	Cass County Telephone
Pclrmoxa	Peculiar	Cass County Telephone
Amnmoxa	Amazonia	CenturyTel (Spectra)
Aurrmoxa	Aurora	CenturyTel (Spectra)
Avcymoxa	Avenue city	CenturyTel (Spectra)
Avllmoxa	Avilla	CenturyTel (Spectra)
Blgrmoxa	Belgrade	CenturyTel (Spectra)
Bctrmoxa	Birch Tree	CenturyTel (Spectra)
Blckmoxa	Bolckow	CenturyTel (Spectra)
Brymmoxa	Braymer	CenturyTel (Spectra)
Bnghmoxa	Bronaugh	CenturyTel (Spectra)
Cldnmoxa	Caledonia	CenturyTel (Spectra)
Cmrrnmoxa	Cameron	CenturyTel (Spectra)
Cntnmoxa	Canton	CenturyTel (Spectra)
Clncmoxa	Clarence	CenturyTel (Spectra)
Csdlmoxa	Clarksdale	CenturyTel (Spectra)
Clnsmoxa	Collins	CenturyTel (Spectra)
Cncrmoxa	Concordia	CenturyTel (Spectra)
Csbymoxa	Cosby	CenturyTel (Spectra)

Estnmoxa	Easton	CenturyTel (Spectra)
Egspmoxa	Edgar Springs	CenturyTel (Spectra)
Elsnmoxa	Ellsinore	CenturyTel (Spectra)
Emermoxa	Elmer	CenturyTel (Spectra)
Evtnmoxa	Everton	CenturyTel (Spectra)
Ewngmoxa	Ewing	CenturyTel (Spectra)
Flmrnox	Fillmore	CenturyTel (Spectra)
Frmtmoxa	Fremont	CenturyTel (Spectra)
Gdcymoxa	Golden city	CenturyTel (Spectra)
Gowrmoxa	Gower	CenturyTel (Spectra)
Gvspmoxa	Grove spring	CenturyTel (Spectra)
Hmtnmoxa	Hamilton	CenturyTel (Spectra)
Htvlmoxa	Hartville	CenturyTel (Spectra)
Hlnamoxa	Helena	CenturyTel (Spectra)
Hstnmoxa	Houston	CenturyTel (Spectra)
Hmvlmoxa	Humansville	CenturyTel (Spectra)
Hnwlnox	Hunnewell	CenturyTel (Spectra)
Irdlmoxa	Irondale	CenturyTel (Spectra)
Jrspnox	Jerico Springs	CenturyTel (Spectra)
Kahkmoxa	Kahoka	CenturyTel (Spectra)
Kddrmoxa	Kidder	CenturyTel (Spectra)
Kgtnnox	Kingston	CenturyTel (Spectra)
Lgrnmoxa	La Grange	CenturyTel (Spectra)
Lpltnox	La Plata	CenturyTel (Spectra)
Lddnmoxa	Laddonia	CenturyTel (Spectra)
Lwcymoxa	Lowry City	CenturyTel (Spectra)
Macnmoxa	Macon	CenturyTel (Spectra)
Mnesmozxa	Manes	CenturyTel (Spectra)
Myvlnox	Maysville	CenturyTel (Spectra)
Milomoxa	Milo	CenturyTel (Spectra)
Mncymoxa	Monroe City	CenturyTel (Spectra)
Mntimoxa	Monticello	CenturyTel (Spectra)
Mtgvmoxa	Mountain grove	CenturyTel (Spectra)
Mtvrnox	Mt Vernon	CenturyTel (Spectra)
Nebomoxa	Nebo	CenturyTel (Spectra)
Nrwdnox	Norwood	CenturyTel (Spectra)
Osbrnox	Osborn	CenturyTel (Spectra)
Osclnox	Osceola	CenturyTel (Spectra)
Plmymoxa	Palmyra	CenturyTel (Spectra)
Parmsnox	Paris	CenturyTel (Spectra)
Prnymoxa	Perry	CenturyTel (Spectra)
Plbgnox	Plattsburg	CenturyTel (Spectra)
Potsnox	Potosi	CenturyTel (Spectra)
Revrmoxa	Revere	CenturyTel (Spectra)
Robymoxa	Roby	CenturyTel (Spectra)
Rkvlnox	Rockville	CenturyTel (Spectra)
Rodlmoxa	Rosendale	CenturyTel (Spectra)

Snfemoxa	Santa Fe	CenturyTel (Spectra)
Srcxmoxa	Sarcoxie	CenturyTel (Spectra)
Svnmoxa	Savannah	CenturyTel (Spectra)
Shcymoxa	Schell city	CenturyTel (Spectra)
Slbnmoxa	Shelbina	CenturyTel (Spectra)
Shlnmoxa	Sheldon	CenturyTel (Spectra)
Swvlmoxa	Stewartsville	CenturyTel (Spectra)
Stvlmoxa	Stoutsville	CenturyTel (Spectra)
Tmbrmoxa	Timber	CenturyTel (Spectra)
Trmbmoxa	Trimble	CenturyTel (Spectra)
Trnymoxa	Turney	CenturyTel (Spectra)
Vznmoza	Vanzant	CenturyTel (Spectra)
Wlkrmoxa	Walker	CenturyTel (Spectra)
Wyldmoxa	Wayland	CenturyTel (Spectra)
Weblmoxa	Weaubleau	CenturyTel (Spectra)
Wqncmoxa	West quincy	CenturyTel (Spectra)
Whvlmoxa	Whitesville	CenturyTel (Spectra)
Winomoxa	Winona	CenturyTel (Spectra)
Asldmoxa	Ashland	CenturyTel Missouri
Agstmoxa	Augusta	CenturyTel Missouri
Avamoxa	Ava	CenturyTel Missouri
Blndmoxa	Bland	CenturyTel Missouri
Bleymoxa	Blue Eye	CenturyTel Missouri
Brbnmoxa	Bourbon	CenturyTel Missouri
Bdylmoxa	Bradleyville	CenturyTel Missouri
Baswmoxa	Branson W	CenturyTel Missouri
Bflomoxa	Buffalo	CenturyTel Missouri
Cablomoxa	Cabool	CenturyTel Missouri
Cpfrmoxa	Cape Fair	CenturyTel Missouri
Csvlmoxa	Cassville	CenturyTel Missouri
Clfdmoxa	Caulfield	CenturyTel Missouri
Cenlmoxa	Centralia	CenturyTel Missouri
Chmsmoxa	Chamois	CenturyTel Missouri
Clrknox	Clark	CenturyTel Missouri
Clmamoxa	Columbia	CenturyTel Missouri
Clmamoxb	Columbia	CenturyTel Missouri
Cnwymoxa	Conway	CenturyTel Missouri
Basnmoxa	Crane	CenturyTel Missouri
Canmoxa	Crane	CenturyTel Missouri
Crtmmoxa	Cross timbers	CenturyTel Missouri
Cubamoxa	Cuba	CenturyTel Missouri
Drdnmoxa	Dardenne	CenturyTel Missouri
Dfncmoxa	Defiance	CenturyTel Missouri
Eklmoxa	Elkland	CenturyTel Missouri
Extrmoxa	Exeter	CenturyTel Missouri
Folymoxa	Foley	CenturyTel Missouri
Frldmoxa	Fordland	CenturyTel Missouri

Frstmoxa	Foristell	CenturyTel Missouri
Frsymoxa	Forsyth	CenturyTel Missouri
Galnmoxa	Galena	CenturyTel Missouri
HLVlmoxa	Hallsville	CenturyTel Missouri
Hwpmnox	Hawk Point	CenturyTel Missouri
Hrmtmoxa	Hermitage	CenturyTel Missouri
Hghlmoxa	High Hill	CenturyTel Missouri
Hldvmoxa	Highlandville	CenturyTel Missouri
Holsmoxa	Holstein	CenturyTel Missouri
Hrlymoxa	Hurley	CenturyTel Missouri
Jmtwmoxa	Jamestown	CenturyTel Missouri
Jnknmoxa	Jenkins	CenturyTel Missouri
Jnbgmoxa	Jonesburg	CenturyTel Missouri
Kmcycox	Kimberling City	CenturyTel Missouri
Kshkmoxa	Koshkonong	CenturyTel Missouri
Lebgmoxa	Leasburg	CenturyTel Missouri
Lsbgmoxa	Louisburg	CenturyTel Missouri
Mnfdmoxa	Mansfield	CenturyTel Missouri
Mrfdmoxa	Marshfield	CenturyTel Missouri
Mtvlmoxa	Marthasville	CenturyTel Missouri
Mrsnmoxa	Morrison	CenturyTel Missouri
Msmllmoxa	Moscow	CenturyTel Missouri
Mtvwmoxa	Mountain View	CenturyTel Missouri
Nwmlmoxa	New Melle	CenturyTel Missouri
Ningmoxa	Niangua	CenturyTel Missouri
Oflnmoxa	O fallon	CenturyTel Missouri
Olmrmoxa	Old Monroe	CenturyTel Missouri
Ozrkcox	Ozark	CenturyTel Missouri
Psbgmoxa	Pittsburg	CenturyTel Missouri
Prrrhcox	Prairie home	CenturyTel Missouri
Pstnmoxa	Preston	CenturyTel Missouri
Rdspcox	Reeds Spring	CenturyTel Missouri
Rhptcox	Rocheport	CenturyTel Missouri
Rcbhmoxa	Rockaway beach	CenturyTel Missouri
Safemoxa	Safe	CenturyTel Missouri
Symprcox	Seymour	CenturyTel Missouri
Shkncox	Shell Knob	CenturyTel Missouri
Sprtmoxa	Sparta	CenturyTel Missouri
Stprcox	St Peters	CenturyTel Missouri
Stjmmoxa	St. James	CenturyTel Missouri
Stfncox	Sturgeon	CenturyTel Missouri
Smvixa	Summersville	CenturyTel Missouri
Thvlcox	Thomasville	CenturyTel Missouri
Troymoxa	Troy	CenturyTel Missouri
Txtncox	Truxton	CenturyTel Missouri
Urbncox	Urbana	CenturyTel Missouri
Vchymoxa	Vichy	CenturyTel Missouri

Wrtnmoxa	Warrenton	CenturyTel Missouri
Wplnmoxa	West plains	CenturyTel Missouri
Wtldmoxa	Wheatland	CenturyTel Missouri
Wlsmoxa	Willow Springs	CenturyTel Missouri
Wnfdmoxa	Winfield	CenturyTel Missouri
Wlrgmoxa	Wooldridge	CenturyTel Missouri
Wrcymoxa	Wright city	CenturyTel Missouri
Pergarxa	Pea Ridge (Jacket)	CenturyTel NW Arkansas
Sgmnmoxa	Seligman	CenturyTel NW Arkansas
Atlnmoxa	Atlanta	Chariton Valley Telephone
Bevrmoxa	Bevier	Chariton Valley Telephone
Bcklmoxa	Bucklin	Chariton Valley Telephone
Blvmoxa	Bynumville	Chariton Valley Telephone
Callmoxa	Callao	Chariton Valley Telephone
Clhlmoxa	Clifton Hill	Chariton Valley Telephone
Ethlmoxa	Ethel	Chariton Valley Telephone
Exclmoxa	Excello	Chariton Valley Telephone
Frgrmoxa	Forest Green	Chariton Valley Telephone
Halemoxa	Hale	Chariton Valley Telephone
Hnvimoxa	Huntsville	Chariton Valley Telephone
Jcvlmoxa	Jacksonville	Chariton Valley Telephone
Mbtnmoxa	New Boston	Chariton Valley Telephone
Nwcmoxa	New cambria	Chariton Valley Telephone
Prhlmoxa	Prairie Hill	Chariton Valley Telephone
Slbrmoxa	Salisbury	Chariton Valley Telephone
Hltwmoxa	Halltown	Choctaw Telephone
Hgvlmoxa	Higginsville	Citizens Telephone
Amstmoxa	Amsterdam	Craw-Kan Telephone
Asbrmoxa	Asbury	Craw-Kan Telephone
Armaksxa	E Mulberry	Craw-Kan Telephone
Pltnksxa	E pleasanton	Craw-Kan Telephone
Fstrmoxa	Foster	Craw-Kan Telephone
Humemoxa	Hume	Craw-Kan Telephone
Prclmoxa	Purcell	Craw-Kan Telephone
Eltnmoxa	Redford	Ellington Telephone
Apcymoxa	Appleton City	Embarq Missouri
Blbnmoxa	Blackburn	Embarq Missouri
Bltwmoxa	Blairstown	Embarq Missouri
Brztmoxa	Brazito	Embarq Missouri
Bcknmoxa	Buckner	Embarq Missouri
Btlrmoxa	Butler	Embarq Missouri
Clhnmoxa	Calhoun	Embarq Missouri
Clfrmoxa	California	Embarq Missouri
Cmpnmoxa	Camden Point	Embarq Missouri
Cntwmoxa	Centertown	Embarq Missouri
Cnvwmoxa	Centerview	Embarq Missouri
Chlhmxoa	Chilhowee	Embarq Missouri

Clbgmoxa	Clarksburg	Embarq Missouri
Cltnmoxa	Clinton	Embarq Missouri
Coalmoxa	Coal	Embarq Missouri
Clcmmoxx	Cole Camp	Embarq Missouri
Cragmoxa	Craig	Embarq Missouri
Debrmoxa	Dearborn	Embarq Missouri
Dpwrmoxa	Deepwater	Embarq Missouri
Egtnmoxa	Edgerton	Embarq Missouri
Eugnmxoa	Eugene	Embarq Missouri
Frfxmoxa	Fairfax	Embarq Missouri
Flvwmxoa	Ferrelview	Embarq Missouri
Ftlwmoxa	Fort Leonard Wood	Embarq Missouri
Gnrgmoxa	Green ridge	Embarq Missouri
Hrdnmoxa	Hardin	Embarq Missouri
Hnvlmoxa	Harrisonville	Embarq Missouri
Hnrtmoxa	Henrietta	Embarq Missouri
Hldnmoxa	Holden	Embarq Missouri
Holtmoxa	Holt	Embarq Missouri
Hpknmoxa	Hopkins	Embarq Missouri
Hostmoxa	Houstonia	Embarq Missouri
Ionimoxa	Ionia	Embarq Missouri
Jfcymoxa	Jefferson City	Embarq Missouri
Hlsmmoxa	Jefferson City	Embarq Missouri
Krnymoxa	Kearney	Embarq Missouri
Kgcymoxa	King City	Embarq Missouri
Kgvlmoxa	Kingsville	Embarq Missouri
Lbnnmoxa	Lebanon	Embarq Missouri
Letnmoxa	Leeton	Embarq Missouri
Lxtnmoxa	Lexington	Embarq Missouri
Lnclmoxa	Lincoln	Embarq Missouri
Lkltmoxa	Lake Lotawana	Embarq Missouri
Lnjcmoxa	Lone jack	Embarq Missouri
Mlbnmoxa	Malta Bend	Embarq Missouri
Mscymoxa	Missouri city	Embarq Missouri
Mtrsmoxa	Montrose	Embarq Missouri
Mdcymoxa	Mound City	Embarq Missouri
Rcptmoxa	Mound City	Embarq Missouri
Nbfdmoxa	New bloomfield	Embarq Missouri
Nwbgmoxa	Newburg	Embarq Missouri
Nrbrmoxa	Norborne	Embarq Missouri
Okgvmxoa	Oak Grove	Embarq Missouri
Odssmoxa	Odessa	Embarq Missouri
Orxkmoxa	Orrick	Embarq Missouri
Oevlamoxa	Otterville	Embarq Missouri
Pcngmoxa	Pickering	Embarq Missouri
Plcymoxa	Platte city	Embarq Missouri
PHlmoxa	Pleasant hill	Embarq Missouri

Rcldmoxa	Richland	Embarq Missouri
Rollmoxa	Rolla	Embarq Missouri
Rlvmoxa	Russellville	Embarq Missouri
Wnvlmoxa	Salem	Embarq Missouri
Shtnmoxa	Smithton	Embarq Missouri
Strbmoxa	St Robert	Embarq Missouri
Stimmoxa	St Thomas	Embarq Missouri
Stbgmoxx	Strasburg	Embarq Missouri
Swspmoxa	Sweet Springs	Embarq Missouri
Syrcmoxa	Syracuse	Embarq Missouri
Taosmoxa	Taos	Embarq Missouri
Tarkmoxa	Tarikio	Embarq Missouri
Tptnmoxa	Tipton	Embarq Missouri
Urchmoxa	Urich	Embarq Missouri
Wrswmoxa	Warsaw	Embarq Missouri
Wyvlmoxa	Waynesville	Embarq Missouri
Wgtmoxa	Wellington	Embarq Missouri
Wstnmoxa	Weston	Embarq Missouri
Wndsmoxa	Windsor	Embarq Missouri
Frbrmoxa	Farber	Farber Telephone
Gerlmoxa	Gerald	Fidelity Telephone
Nwhnmoxa	Lyon	Fidelity Telephone
Owvlmoxa	Owensville	Fidelity Telephone
Sllvmoxa	Owensville	Fidelity Telephone
Gdmnmoxa	Goodman	Goodman Telephone
Lngnmoxa	Lanagan	Goodman Telephone
Grnbmoxa	Granby	Granby Telephone
Lardmoxa	Laredo	Grand River Mutual
Lnnsmoxa	Linneus	Grand River Mutual
Mdvlmoxa	Meadville	Grand River Mutual
Mtmrmoxa	Mt Moriah	Grand River Mutual
Nhtnmoxa	New Hampton	Grand River Mutual
Prnlmoxa	Parnell	Grand River Mutual
Prdnmoxa	Purdin	Grand River Mutual
Rvwdmoxa	Ravenwood	Grand River Mutual
Rdwymoxa	Ridgeway	Grand River Mutual
Shrdmoxa	Sheridan	Grand River Mutual
Wsctmoxa	Washington Center	Grand River Mutual
Lamniaxo	Andover	Grand River Mutual
Brnrmoxa	Barnard	Grand River Mutual
Bthnmoxa	Bethany	Grand River Mutual
Brngmoxa	Browning	Grand River Mutual
Cavlmoxa	Cainsville	Grand River Mutual
Chulmoxa	Chula	Grand River Mutual
Cnjtmoxa	Conception Junction	Grand River Mutual
Drtnmoxa	Darlington	Grand River Mutual
Dnvrnmxo	Denver	Grand River Mutual

Eavlmoxa	Eagleville	Grand River Mutual
Gntrmoxa	Gentry	Grand River Mutual
Glcymoxa	Gilman city	Grand River Mutual
Grhmmoxa	Graham	Grand River Mutual
Jmptmoxa	Jamesport	Grand River Mutual
Dvcyiaxo	South Davis City	Grand River Mutual
Ldlwmoxa	Ludlow	Green Hills Telephone
Mrvimoxa	Mooreville	Green Hills Telephone
Lcspmoxa	Lock Springs	Green Hills Telephone
Polomoxa	Polo	Green Hills Telephone
Wlngmoxa	Wheeling	Green Hills Telephone
Avlnmoxa	Avalon	Green Hills Telephone
Brrgmoxa	Breckenridge	Green Hills Telephone
Cwglmoxa	Cowgill	Green Hills Telephone
Dawnmoxa	Dawn	Green Hills Telephone
Knvlmoxa	Knoxville	Green Hills Telephone
Mtldmoxa	Maitland	Holway Telephone
Brjtmoxa	Burlington Junction	Iamo Telephone Co.
Clmtmoxa	Clearmont	Iamo Telephone Co.
Elmomoxa	Elmo	Iamo Telephone Co.
Wsbomoxa	Westboro	Iamo Telephone Co.
Frtniaxo	Athens	Iowa Telecom
Brvliaxo	South Braddyville	Iowa Telecom
Axvsmoxa	Big spring	Kingdom Telephone
Rhhlmoxa	Metz	KLM Telephone Co
Lthpmoxa	Lathrop	Lathrop Telephone
Powlmoxa	Powell	Le-Ru Telephone
Phlamoxa	Philadelphia	Mark Twain Rural Telephone
Wltwmoxa	Williamstown	Mark Twain Rural Telephone
Brshmoxa	Brashear	Mark Twain Rural Telephone
Drhmmoxa	Durham	Mark Twain Rural Telephone
Gntpmoxa	Greentop	Mark Twain Rural Telephone
Hrldmoxa	Hurdland	Mark Twain Rural Telephone
Janemoxa	Jane	McDonald County Telephone
Pivlmoxa	Pineville	McDonald County Telephone
Arsnmoxa	Anderson	McDonald County Telephone
Arrkmoxa	Arrow Rock	Mid-Missouri Telephone
Ftunmoxa	Fortuna	Mid-Missouri Telephone
Gllmmoxa	Gilliam	Mid-Missouri Telephone
Hgpnmoxa	High Point	Mid-Missouri Telephone
Lthmmoxa	Latham	Mid-Missouri Telephone
Mrjtmoxa	Marshall junction	Mid-Missouri Telephone
Nlsnmoxa	Nelson	Mid-Missouri Telephone
Plgvmoxa	Pilot grove	Mid-Missouri Telephone
Spedmoxa	Speed	Mid-Missouri Telephone
Bctnmoxa	Bunceton	Mid-Missouri Telephone
Blwrmoxa	Blackwater	Mid-Missouri Telephone Co.

Mllrmoxa	Miller	Miller Telephone Co
Frmnmoxa	Freeman	MoKan Dial
Gncymoxa	Lemons	NE MO Rural
Mmphmoxa	Memphis	NE MO Rural
Nwflmoxa	New florence	New Florence
Nwlnmoxa	New London	New London Telephone
Orchmoxa	Orchardfrm	Orchard Farm Telephone
Orgnmoxa	Oregon	Oregon Farmers Mutual Telephone
Neolmoxa	Noel	Ozark Telephone
Swcymoxa	Southwest city	Ozark Telephone
Pcvymoxx	Peace Valley	Peace Valley Telephone
Rcptmoxb	So Hamburg	Rock Port Telephone
Wtsnmoxa	Watson	Rock Port Telephone
Sencmoxa	Seneca	Seneca Telephone
Tiffmoxa	Tiff City	Seneca Telephone
Wrbgmoxa	Coal	Socket Telecom
Mavlmoxa	Hopkins	Socket Telecom
Chvlmoxa	Cherryville	Steelville Telephone Exchange
Hzzhmoxa	Huzzah	Steelville Telephone Exchange
Sevlmoxa	Steelville	Steelville Telephone Exchange
Elrgmoxa	Eldridge	Stoutland Telephone
Stldmoxa	Stoutland	Stoutland Telephone
Albymoxa	Albany	Windstream Missouri
Aldrsmoxa	Aldrich	Windstream Missouri
Aldlmoxa	Allendale	Windstream Missouri
Bflfmoxa	Bellflower	Windstream Missouri
Blvrsmoxa	Bolivar	Windstream Missouri
Clubmoxx	Clubb	Windstream Missouri
Cffymoxa	Coffey	Windstream Missouri
Crcrmoxa	Crocker	Windstream Missouri
Dixnmoxa	Dixon	Windstream Missouri
Eolimixa	Eolia	Windstream Missouri
Frplmoxa	Fair Play	Windstream Missouri
Frdlmoxa	Fairdealng	Windstream Missouri
Frvwmoxa	Fairview	Windstream Missouri
Flrnmoxa	Florence	Windstream Missouri
Gallmoxa	Gallatin	Windstream Missouri
Gdinmoxa	Grandin	Windstream Missouri
Gtcymoxa	Grant City	Windstream Missouri
Hlwymoxa	Halfway	Windstream Missouri
Hldymoxa	Holliday	Windstream Missouri
Ibermoxx	Iberia	Windstream Missouri
Jmsnmoxa	Jameson	Windstream Missouri
Lldmoxa	Laclede	Windstream Missouri
Lbrlmoxa	Liberal	Windstream Missouri
Mdsnmoxa	Madison	Windstream Missouri
Mrbgmoxa	Martinsburg	Windstream Missouri

Mndnmoxx	Mendon	Windstream Missouri
Mdtwmoxa	Middletown	Windstream Missouri
Kklvmomo	Milan	Windstream Missouri
Mdnmmoxa	Mindenmines	Windstream Missouri
Mrvlmoxa	Morrisvl	Windstream Missouri
Nylrmoxx	Naylor	Windstream Missouri
Nlvmoxa	Neelyville	Windstream Missouri
Nhfrmoxa	New Hartford	Windstream Missouri
Olnymoxa	Olney	Windstream Missouri
Ptbgmoxx	Pattonsburg	Windstream Missouri
Pdmtmoxx	Piedmont	Windstream Missouri
Plhpmoxa	Pleasant hope	Windstream Missouri
Polkmoxa	Polk	Windstream Missouri
Prdymoxa	Purdy	Windstream Missouri
Rtvlmoxx	Rothville	Windstream Missouri
Silxmoxa	Silex	Windstream Missouri
Stezmoxa	St elizabeth	Windstream Missouri
Stcymoxa	Stark City	Windstream Missouri
Sktnmoxa	Stockton	Windstream Missouri
Socymoxa	Stotts city	Windstream Missouri
Stvrnox	Stover	Windstream Missouri
Smnrmoxa	Sumner	Windstream Missouri
Unstmoxa	Union Star	Windstream Missouri
Vandmoxa	Vandalia	Windstream Missouri
Vrnamoxa	Verona	Windstream Missouri
Wpplmoxx	Wappapelo Park	Windstream Missouri
Whtnmoxa	Wheaton	Windstream Missouri
Wsvlmoxa	Williamsville	Windstream Missouri
Wntnmoxa	Winston	Windstream Missouri

EXHIBIT 8

CTIA Code

CTIA

Consumer Code *for* Wireless Service

To provide consumers with information to help them make informed choices when selecting wireless service, to help ensure that consumers understand their wireless service and rate plans, and to continue to provide wireless service that meets consumers' needs, the CTIA and the wireless carriers that are signatories below have developed the following Consumer Code. The carriers that are signatories to this Code have voluntarily adopted the principles, disclosures, and practices here for wireless service provided to individual consumers.

THE WIRELESS CARRIERS THAT ARE SIGNATORIES TO THIS CODE WILL:

ONE

DISCLOSE RATES AND TERMS OF SERVICE TO CONSUMERS

For each rate plan offered to new consumers, wireless carriers will make available to consumers in collateral or other disclosures at point of sale and on their web sites, at least the following information, as applicable: (a) the calling area for the plan; (b) the monthly access fee or base charge; (c) the number of airtime minutes included in the plan; (d) any nights and weekend minutes included in the plan or other differing charges for different time periods and the time periods when nights and weekend minutes or other charges apply; (e) the charges for excess or additional minutes; (f) per-minute long distance charges or whether long distance is included in other rates; (g) per-minute roaming or off-network charges; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) whether a fixed-term contract is required and its duration; (k) any activation or initiation fee; and (l) any early termination fee that applies and the trial period during which no early termination fee will apply.

TWO

MAKE AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Wireless carriers will make available at point of sale and on their web sites maps depicting approximate voice service coverage applicable to each of their rate plans currently offered to consumers. To enable consumers to make comparisons among carriers, these maps will be generated using generally accepted methodologies and standards to depict the carrier's outdoor coverage. All such maps will contain an appropriate legend concerning limitations and/or variations in wireless coverage and map

usage, including any geographic limitations on the availability of any services included in the rate plan. Wireless carriers will periodically update such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, carriers will request and incorporate coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

T H R E E

PROVIDE CONTRACT TERMS TO CUSTOMERS AND CONFIRM CHANGES IN SERVICE

When a customer initiates service with a wireless carrier or agrees to a change in service whereby the customer is bound to a contract extension, the carrier will provide or confirm the material terms and conditions of service with the subscriber.

F O U R

ALLOW A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates service with a wireless carrier, the customer will be informed of and given a period of not less than 14 days to try out the service. The carrier will not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including airtime usage, may still apply.

F I V E

PROVIDE SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service or devices, wireless carriers will disclose material charges and conditions related to the advertised prices, including if applicable and to the extent the advertising medium reasonably allows: (a) activation or initiation fees; (b) monthly access fees or base charges; (c) any required contract term; (d) early termination fees; (e) the terms and conditions related to receiving a product or service for "free;" (f) the times of any peak and off-peak calling periods; (g) whether different or additional charges apply for calls outside of the carrier's network or outside of designated calling areas; (h) for any rate plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; (i) whether prices or benefits apply only for a limited time or promotional period and, if so, any different fees or charges to be paid for the remainder of the contract term; (j) whether any additional taxes, fees or surcharges apply; and (k) the amount or range of any such fees or surcharges collected and retained by the carrier.

S I X

SEPARATELY IDENTIFY CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, carriers will distinguish (a) monthly charges for service and features, and other charges collected and retained by the carrier, from (b) taxes, fees and other charges collected by the carrier and remitted to federal state or local governments. Carriers will not label cost recovery fees or charges as taxes.

S E V E N

**PROVIDE CUSTOMERS THE RIGHT TO TERMINATE SERVICE
FOR CHANGES TO CONTRACT TERMS**

Carriers will not modify the material terms of their subscribers' contracts in a manner that is materially adverse to subscribers without providing a reasonable advance notice of a proposed modification and allowing subscribers a time period of not less than 14 days to cancel their contracts with no early termination fee.

E I G H T

PROVIDE READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access a carrier's customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Each wireless carrier will provide information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information will be included, at a minimum, on all billing statements, in written responses to customer inquiries and on carriers' web sites. Each carrier will also make such contact information available, upon request, to any customer calling the carrier's customer service departments.

N I N E

**PROMPTLY RESPOND TO CONSUMER INQUIRIES AND COMPLAINTS
RECEIVED FROM GOVERNMENT AGENCIES**

Wireless carriers will respond in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

T E N

ABIDE BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Each wireless carrier will abide by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and will make available to the public its privacy policy concerning information collected online.