

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

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

**Case No. RA-2011-0299**

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

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

1. On March 23, 2011, Stand Up Wireless filed its Application for Designation as an Eligible Telecommunications Carrier on a Wireless Basis. In paragraph 13(g) of its Application, the Company states, “all providers are required to contribute a portion of the interstate revenues received from their customers to the Universal Service Fund. In accordance with current federal regulations, Stand Up Wireless will make contributions based on that portion of its revenue that is determined to be interstate. As such, approving Stand Up Wireless as an ETC will actually create contributions to the USF that were previously non-existent, as its customers traditionally do not have telephone service at the time they sign up for service with Stand Up Wireless.”

2. Stand Up Wireless respectfully requests that Paragraph 13(g) of its Application be amended to add the following statement: “Moreover, the Company commits to remit 911

revenues to local authorities. The Company shall pay in a timely manner all applicable federal, state and local regulatory fees, including but not limited to universal service and E-911 fees. See ‘TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition’, FCC Docket No. 96-45 (May 3, 2010).”

WHEREFORE, Stand Up Wireless respectfully requests that Paragraph 13(g) of its Application for Designation as an Eligible Telecommunications Carrier on a Wireless Basis be amended to add the following statement: “Moreover, the Company commits to remit 911 revenues to local authorities. The Company shall pay in a timely manner all applicable federal, state and local regulatory fees, including but not limited to universal service and E-911 fees. See ‘TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition’, FCC Docket No. 96-45 (May 3, 2010).”

Respectfully submitted,

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

By: /s/ Lisa A. Gilbreath

Mark P. Johnson MBN 30740  
Lisa A. Gilbreath MBN 62271  
SNR Denton US LLP  
4520 Main, Suite 1100  
Missouri City, Missouri 64111  
Telephone: (816) 460-2424  
Facsimile: (816) 351-7545  
mark.johnson@snrrenton.com  
lisa.gilbreath@snrrenton.com

and

Stanley Q. Smith  
WATKINS LUDLAM WINTER & STENNIS,  
P.A.  
190 E. Capitol Street, Suite 800 (39201)  
P. O. Box 427  
Jackson, Mississippi 39205-0427

Telephone: (601) 949-4863  
Facsimile: (601) 949-4804  
stansmith@watkinsludlam.com

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this the 28th day of September, 2011, served a true copy of the foregoing Amendment upon the following parties, listed below, in accordance with Commission

Rules:

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

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

/s/Lisa A. Gilbreath  
Lisa A. Gilbreath