

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF THE APPLICATION    )**  
**OF GLOBAL CONNECTION INC. OF        )**  
**AMERICA D/B/A STAND UP WIRELESS    )**        **Case No. RA-2011-0299**  
**FOR DESIGNATION AS AN ELIGIBLE     )**  
**TELECOMMUNICATIONS CARRIER ON    )**  
**A WIRELESS BASIS (LOW INCOME ONLY) )**

**AMENDMENT TO INFORMATIONAL FILING**

COMES NOW Global Connection Inc. of America d/b/a Stand Up Wireless (“Stand Up Wireless” or the “Company”) and, pursuant to 4 CSR 240-3.570(3)(D), hereby files the following amendment to its November 21, 2011 informational filing. 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. The Commission granted the Company’s Application and designated it an Eligible Telecommunications Carrier (“ETC”) in order to receive federal universal service support for low income customers through the Lifeline and Link Up programs on October 26, 2011, effective November 5, 2011.
2. Pursuant to 4 CSR 240-3.570(3)(D), the Company made its informational filing, consisting of a complete description of its service offerings, on November 21, 2011.
3. The Federal Communications Commission (“FCC”) has issued a number of orders since the time of the Company’s informational filing that amend its rules governing the Lifeline and Link Up programs and that affect the Company’s service offerings in the State of Missouri. Consequently, Stand Up Wireless files this amendment to its November 21, 2011 informational filing and modifies its service offerings to accord with those amendments made by the FCC.

**A. Stand Up Wireless Will No Longer Offer Link Up.**

4. On February 6, 2012, the FCC released its Lifeline Reform Order, which amended its rules, effective April 1, 2012, to eliminate Link Up support on all non-Tribal lands for all ETCs.<sup>1</sup> As a result of the Lifeline Reform Order, the Company will not provide Link Up support after March 2012.

5. In paragraphs 9-10 of its informational filing, Stand Up Wireless stated that it will use Link Up support to reduce the Company's wireless activation fee, and that customers may request a deferred payment schedule for any remaining installation charges. The Company no longer will charge customers an activation fee. As such, there is no up-front connection charge applicable to Stand Up Wireless Lifeline customers.

**B. Supported Services.**

6. Section 214(e)(1)(A) of the Act<sup>2</sup> requires an ETC to offer the services that are supported by federal universal service support mechanisms under section 254(c). Effective December 29, 2011, pursuant to the USF/ICC Transformation Order<sup>3</sup>, as further clarified by the USF/ICC Order on Reconsideration,<sup>4</sup> "voice telephony services" shall be supported by federal universal support mechanisms. Eligible voice telephony services must provide:

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<sup>1</sup> In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6 2012) ("Lifeline Reform Order").

<sup>2</sup> 47 U.S.C. § 214(e)(1).

<sup>3</sup> In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("USF/ICC Transformation Order").

<sup>4</sup> In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal

- (1) Voice grade access to the public switched network or its functional equivalent;
- (2) Minutes of use for local service provided at no additional charge to end users;
- (3) Access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and
- (4) Toll limitation for qualifying low-income consumers.

7. Stand Up Wireless will offer voice telephony services as described in Section 54.101 of the FCC Rules, consistent with state and federal policies favoring universal service.<sup>5</sup>

**C. Stand Up Wireless Has Filed a Compliance Plan With the FCC.**

8. Under Section 214(e)(1)(A) of the Act, an ETC must offer the services supported by federal universal service support mechanisms throughout its designated service area "either using its own facilities or a combination of its own facilities and resale of another carrier's services."<sup>6</sup> In its Lifeline Reform Order the FCC indicated its intent to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the filing and approval by the FCC of a compliance plan describing the ETC's adherence to certain protections prescribed by the FCC ("Blanket Forbearance").<sup>7</sup>

9. Stand Up Wireless sought limited ETC designation in Missouri to participate in the Lifeline program and has opted to pursue Blanket Forbearance. On March 8, 2012, the Company filed its Compliance Plan ("Compliance Plan") with the FCC, a copy of which is attached hereto as **Exhibit I**. This Compliance Plan has not yet been approved by the FCC.

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Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) ("USF/ICC Order on Reconsideration").

<sup>5</sup> 47 C.F.R. §§ 54.101(a).

<sup>6</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>7</sup> Lifeline Reform Order at ¶ 368.

WHEREFORE, Global Connection Inc. of America d/b/a Stand Up Wireless hereby files the foregoing amendment to the description of its service offerings, pursuant to 4 CSR 240-3.570(3)(D).

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of March, 2012 copies of the foregoing have been mailed, transmitted by facsimile, or emailed to all counsel of record.

/s/Lisa A. Gilbreath  
Lisa A. Gilbreath