### Robert N. Felgar

From:

Jennifer Shappell

Sent:

Wednesday, March 14, 2012 11:23 AM

To:

Robert N. Felgar

Subject:

FW: Annie Mena commented on ticket "Missouri Launch - Zip Codes"

From: Fanhub Notifications [mailto:noreply@fanhub.com]

Sent: Tuesday, February 07, 2012 5:16 PM

To: Jennifer Shappell

Subject: Annie Mena commented on ticket "Missouri Launch - Zip Codes"

### **BeQuick Notification**

New Comment by Annie Mena

Hi Kim,

Can you please attach an excel or txt file with this information, the developers cannot use a PDF to retrieve the data. Thanks!

Annie

QuickTel Ticket

121314

#:

Status:

Open

Subject:

Missouri Launch - Zip Codes

Please convert the attached list of AT&T wire centers in

Missouri to zip codes.

Message:

Please let me know if there are any questions.

Thank you-

Click here to view

No virus found in this message. Checked by AVG - www.avg.com

Version: 2012.0.1913 / Virus Database: 2114/4870 - Release Date: 03/14/12

### Robert N. Felgar

From: Sent:

Jennifer Shappell

Wednesday, March 14, 2012 11:23 AM

To:

Robert N. Felgar

Subject:

FW: InfoUSA.com Order - under 30k

Attachments:

Terms And Conditions.doc; What to expect.doc

From: HELP@INFOUSA.COM [mailto:HELP@INFOUSA.COM]

Sent: Wednesday, February 15, 2012 5:16 PM

To: Nathan Stierwalt Cc: Jennifer Shappell

Subject: InfoUSA.com Order - under 30k

To ensure deliverability, add ORDERCONFIRMATION@InfoUSA.COM to your address book



5711 S. 86th Circle Omaha, NE 68127 866.382.2555

### Thank You for Your Order!

Please retain this email for your records.

The attached file contains proprietary information owned by Infogroup, Inc. Your opening of the file and/or use of any information provided by Infogroup constitutes your acceptance of the terms of use contained in the attached document describing Infogroup's terms and conditions. If these terms and conditions are not acceptable, in their entirety, do not open the file and/or use any of the information contained within it.

Our database was processed against the United States Postal Service's NCOALink® database on 1/5/2012. To comply with USPS Move Update requirements for First Class and Standard mail, send your mailing on or before 04/09/2012.

USPS Move Update regulations require mailers to use addresses that were updated within the previous 95 days. Contact your sales representative or customer service with questions or if you need your mailing list updated.

Sold To: CINTEX **WIRELESS** 11910-U **PARKLAWN** ROCKVILLE. MD 20852 **PAUL GREENE** (301)255-

Delivery Format: DOWNLOAD

Click on the following link to begin your download: http://account.infousa.com/Account/MyLists.aspx?bas\_vendor=099789&tab=1

If you have problems with the link, please call customer service at 866.382.2555

0410 Order Number: 1274277707

### **Enhanced Mapping Functionality**

Please use this Mapping Link to see your leads plotted on a map, thematic density maps of your purchased leads, more detailed popup information and printing capabilities to be used as a sales leads map. For your convenience we will keep the mapping link activated for 7 days, feel free to access the map as often as you like.

Product	No. of Leads	Price
Consumer Leads	515087	\$36056.09
Sub Total:		\$36056.09
Tax:		\$0.00
Discount:		-\$36056.09
Final Price:		\$0.00

Due Upon Receipt Payment Method:

### Lead Selection Criteria

**GEOGRAPHY:** ZIP CODE: 60154 ZIP CODE: 62028 ZIP CODE: 63005 ZIP CODE: 63006 ZIP CODE: 63010 ZIP CODE: 63011 ZIP CODE: 63012 ZIP CODE: 63013 ZIP CODE: 63015 ZIP CODE: 63016 ZIP CODE: 63017 ZIP CODE: 63019 ZIP CODE: 63020 ZIP CODE: 63021 ZIP CODE: 63023 ZIP CODE: 63025 ZIP CODE: 63026 ZIP CODE: 63028 ZIP CODE: 63030 ZIP CODE: 63031 ZIP CODE: 63033 ZIP CODE: 63034 ZIP CODE: 63036 ZIP CODE: 63037 ZIP CODE: 63038

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ZIP CODE: 64801
SORT SEQUENCE: STRAIGHT ZIP CODE SORT
 Customer Service
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For customer service, call us toll-free at 866.382.2555 or email us at INFOGROUPCSR@INFOGROUP.COM.

No virus found in this message. Checked by AVG - <u>www.avg.com</u> Version: 2012.0.1913 / Virus Database: 2114/4870 - Release Date: 03/14/12

### **Brandt Mensh**

From:

Sean Biganski [sean.biganski@bqsoft.com]

Sent:

Wednesday, June 27, 2012 5:30 PM

To:

Annie Mena

Cc:

Brandt Mensh; Robert N. Felgar; Bryant Peters; Stuart Chowning

Subject:

Re: Using replicated server to lookup rate center zip codes (Ticket ld 121314)

Brandt, I have some good news and bad news. The good news is that the developer who closed the ticket happened to save the query he ran to his computer. The bad news is that he misunderstood the nature of the request and his query was incorrect.

The query he built was keying off the **city name** instead of the rate center column. Some of the matches would be fine as the city name matches the rate center in some cases but it would definitely return undesirable results as well.

We can jump on the phone to discuss further. I am sure this is bad news and we feel really bad this happened. I don't think anyone here realized how this information was going to be used or I may have gotten involved personally.

What can I do to assist in smoothing this over for the audit process?

Sean Biganski Chief Technical Officer BeQuick Software, Inc.

Phone: (561) 721-9600 x219

Skype: sean.biganski

Sent with Sparrow

On Wednesday, June 27, 2012 at 4:33 PM, Annie Mena wrote:

Per our conversation please see below information provided to Jong on how to convert wire center to zip code.

The third party vendor used is <a href="http://www.quentinsagerconsulting.com/">http://www.quentinsagerconsulting.com/</a>

Best regards,

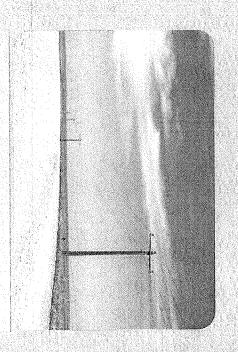
Annie Mena Senior Account Manager BeQuick Software, Inc. 4280 Professional Center Drive Suite 200 Palm Beach Gardens, FL 33410 P: 561.721.9600 x233 F: 561.880.6260

E-mail: annie.mena@bqsoft.com



# High Cost & Low Income

## Audits & Assessments



October 2011 | Denver, CO



## Low Income Fieldwork

Helping Keep Americans Connected

### Serie Cation

- Rules vary: federal default or state mandated state
- days to prove qualification Notify subscribers of impending termination with 60

### Other Tests

- Ensure subscribers are located in designated areas
- Ensure tribal subscribers reside on tribal lands
- If prorated/partial discounts are provided, amounts can be claimed on Line 9



### FREE PHONE AND FREE SERVICE ACT NOW – LIMITED SUPPLY

Dear Current Resident of Maryland,

You have been selected to receive a special offer for a FREE wireless phone and FREE wireless minutes at NO cost to you. This special offer requires no contract, no credit check, and no monthly bill. Cintex has been authorized by the Maryland Public Utilities Commission to offer this service which helps people in need receive telephone service.

At no cost to you, Cintex will provide the following service:

- Free Wireless Phone
- Free Monthly Minutes for a Year
- Free Caller ID, Call Waiting, Call Forwarding, 3-Way Calling and Voicemail

To qualify for this program you must participate in **at least one** government program. The government program(s) that qualify you for this special offer are the following:

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI)
- Temporary Cash Assistance (TCA)
- Electric Universal Service Program (EUSP)
- Medical Assistance (MA)
- Public Assistance to Adults (PAA)
- Temporary Disability Assistance Program (TDAP)
- Maryland Energy Assistance Program (MEAP)

To receive this special offer, follow three simple steps:



Fill out the enclosed application

– we've provided an additional
form for family or friends that
may also qualify.



Sign the application and mail it to Cintex in the enclosed envelope (no postage necessary), or Fax to (301) 761-1625



Wait for your phone.

If you have questions regarding this process or would like additional information, please call 1-800-826-0337 or visit www.CintexWireless.com.

Dear Current Resident of Missouri,

You have been selected to receive a special offer for a FREE WIRELESS PHONE AND FREE WIRELESS MINUTES AT NO COST TO YOU. This special offer requires No Contract, No Credit Check, and No Monthly Bill. Cintex has been authorized by the Missouri Public Service Commission to offer this service which helps people in need receive telephone service.

At NO COST TO YOU, Cintex will provide the following:

- Free Wireless Phone
- Free Minutes Every Month
- Free Caller ID, Call Waiting, Call Forwarding, 3-Way Calling and Voicemail

To qualify for this program you must participate in at least one of the following government programs. Please enclose a copy of one of the following; a Benefit ID Card (Food Stamp Card or Medicaid Card), a monthly statement from a government agency, or a copy of your LIHEAP utility bill (if applicable):

- MO Health (formerly Medicaid)
- · Food Stamps
- · Supplemental Security Income
- Low-Income Home Energy Assistance Program (LIHEAP)

- Federal Public Housing Assistance or Section 8
- · National School Free Lunch Program
- Temporary Assistance for Needy Families

Important: You can not apply to the program if you or someone in your household is already enrolled in the lifeline program. If you do not use your phone in any 60-day period, your free wireless service will be deactivated.

To receive this special offer, follow three simple steps:



Fill out the enclosed application and select the low-income program(s) in which you participate in.

We've provided an additional application for family or friends that may also qualify.



Enclose one of the following:

- A copy of your benefit ID card (Food Stamp card or Medicaid card)
- A monthly statement from a government agency
- Or a copy of your LIHEAP utility bill (if applicable), to prove that you qualify in the government program that you select.



Mail application in the enclosed envelope (no postage necessary), or Fax to (301) 761-1625.

Then wait for your phone.

If you have questions regarding this process or would like additional information, please call 1-800-826-0328 or visit www.CintexWireless.com.

### Robert N. Felgar

From:

Robert N. Felgar

Sent:

Friday, May 25, 2012 3:43 PM

To: Subject: 'Kimberly Scardino' Cintex and Missouri

Hi Kim,

It has come to my attention that Cintex has approximately 1,300 customers, not 10,000 customers, in Missouri. There was an internal miscommunications: I was provided with the number of applications received rather than the number of people to whom we are providing service. Many applications were rejected because they were not complete or did not provide adequate proof. Cintex has also clarified this with the Missouri Commission.

In light of this new information, Cintex has decided to continue to provide service to these customers until its compliance plan is approved, regardless of whether it receives reimbursement from USAC. This has been communicated to the Missouri Commission.

On a separate note, can you please confirm that we are scheduled to meet on June 6 at 3PM? Thank you and have a nice weekend.

Regards, Robert Felgar

### Anited States of America Mariton States Patent and Aradomark Office United States Patent and Trademark Office

### LIBERTY WIRELESS

Reg. No. 4,028,960

CINTEX WIRELESS, LLC (DELAWARE LIMITED LIABILITY COMPANY)

Registered Sep. 20, 2011 11910 PARKLAWN DRIVE

ROCKVILLE, MD 20852

Int. Cl.: 38

FOR: TELECOMMUNICATIONS RESELLER SERVICES, NAMELY, PROVIDING CELLULAR TELECOMMUNICATIONS SERVICES, IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

SERVICE MARK

FIRST USE 8-3-2002; IN COMMERCE 8-3-2002.

PRINCIPAL REGISTER

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PAR-TICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 2,928,910, 2,979,533, AND 3,425,728.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "WIRELESS", APART FROM THE MARK AS SHOWN.

SER, NO. 85-293,339, FILED 4-12-2011.

INGA ERVIN, EXAMINING ATTORNEY



Director of the United States Patent and Trudemark Office

### United States of America United States Patent and Trademark Office



Reg. No. 4,034,530

Registered Oct. 4, 2011

Int. Cl.: 38

SERVICE MARK

PRINCIPAL REGISTER

CINTEX WIRELESS, LLC (DELAWARE LIMITED LIABILITY COMPANY)

SHITE

11910 PARKLAWN DRIVE ROCKVILLE, MD 20852

FOR: TELECOMMUNICATION SERVICES, NAMELY, WIRELESS TELEPHONE SERVICES,

FIRST USE 4-10-2008; IN COMMERCE 4-10-2008.

IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

OWNER OF U.S. REG. NO. 3,028,240.

THE COLOR(S) YELLOW AND BLACK IS/ARE CLAIMED AS A FEATURE OF THE MARK.

THE MARK CONSISTS OF THE WORD "MOVIDA". THE LETTERS "M", "V", "I", "D", "A" ARE WRITTEN IN BLACK, WHILE THE "O" IS A YELLOW SPHERE.

THE ENGLISH TRANSLATION OF "MOVIDA" IN THE MARK IS MOVE OR MOVEMENT.

SER. NO. 85-249,535, FILED 2-23-2011.

INGA ERVIN, EXAMINING ATTORNEY



land J. Lypas

Director of the United States Patent and Trademark Office

### CGM, LLC – Intercompany Duplicate Database Summary of Functionality

### **Functionality**

The CGM Intercompany Lifeline Duplicate Database (DD)is a name/address lookup tool for duplicate detection/prevention. CGM clients have the opportunity to take part in the DD on two separate levels. They can elect to take part in seeding the DD, and can also elect to employ the DD for pre-enrollment editing. These are independent decisions, in that a company that elects to seed the database is not required to employ the database for pre-enrollment editing, though CGM recommends use of the database for pre-enrollment editing to all ETCs.

Scenario #1: If Company A dips for a name/address that doesn't exist in the DD, Company A will receive a reservation that will last until Company A's next month-end customer file is received at CGM. If that name/address combination is not on the month-end file, then that reservation will be released.

Scenario #2: If Company A dips a name/address that already exists in the DD, then company A will receive a duplicate failure notification.

Scenario #3: If Company B dips a name/address one day after Company A dipped the same name/address and secured a reservation then Company B will receive a duplicate failure notification.

### Recommended Use

- 1. CGM recommends that all participants seed the DD and employ it for pre-enrollment editing.
- 2. In the case of a duplicate denial, CGM recommends telling the prospect to come back in 60 days. This is the maximum amount of time it could take for the DD to fully refresh.
- 3. The logic supporting use of the DD for pre-enrollment editing is as follows:
  - a. If the prospective end user's name/address, per their government issued picture ID, is a perfect match in the DD, their chances of being a duplicate are above 95%. The likelihood of having a long-term relationship with this duplicate user is significantly lower than having one with a non-duplicate user, because the duplicate user's perceived value of the phone is much lower they likely believe that they can get another lifeline handset/service whenever they want to, and therefore have less incentive to use the services or purchase top-off minutes from their provider(s). Why waste a single phone (stranded investment) on a customer that has a high likelihood of non-usage/non-top-off. A duplicate user has already figured out how not to buy top-off minutes from you. Enrollment quality drives usage, and usage drives retention. Aim for high quality enrollments.
  - b. For the remaining 5%, the only statistically valid reason that they wouldn't be a legitimate duplicate is a timing issue: their service was recently cancelled by another lifeline service provider. The only statistically valid reason that their service would be cancelled by another lifeline service provider is for non-usage. Odds are that the customer's usage patterns won't change with a new provider; the new provider

CGM, LLC - Proprietary and confidential.

- wouldgive them a handset/service and likely have to disconnect them in 60 days for non-usage, also. For every such non-using customer, the DD will savethe ETC an estimated \$11.50, when you compare an average total cost of acquisition, handset and 60 days of network cost (\$30) to two months of basic subsidy revenue (\$18.50).
- c. Lastly, a similar savings-per-duplicate-prevented model applies, the closer we get to the Feb 1, 2013, launch date of the National Duplicate Database. We're now seven months away. If an ETC's breakeven point on a new account is anywhere close to seven months, they should be employing DD pre-enrollment screening, now.

### **DD Seeding Participants**

In the state of Missouri, companies that seed their data to the DD account for 40% of active lifelines in the state (140,000 of 352,000).

### Summary

Cintex Wireless takes advantage of both aspects of the CGM DD database. They seed all of their Missouri customers to the DD, and dip into the DD, pre-enrollment to prevent duplicates.

### Robert N. Felgar

From:

Parish, Dana [dana.parish@psc.mo.gov]

Sent:

Monday, March 26, 2012 9:49 AM

To: Subject:

Robert N. Felgar RE: Cintex Wireless

Sorry, I sent the email below to startec.com and it was returned as undeliverable over the weekend. I am forwarding it on to libertywireless.com this morning.

From: Parish, Dana

Sent: Friday, March 23, 2012 1:38 PM

To: 'robert.felgar@startec.com'

Subject: Lifeline Forms:

Robert,

Per our discussion this afternoon regarding what is or is not acceptable regarding the customer's signature, I have received confirmation. The customer must sign in the customer designated area only, where it specifically instructs the customer to provide signature. A customer's signature on the customer rep signature line, or any other area not specifically stating for the customer to sign, should not be accepted.

Thank you,

Dana Parish

Utility Policy Analyst Missouri Public Service Commission Telecommunications Dept. (573) 526-4777



From: Robert N. Felgar [mailto:RFelgar@libertywireless.com]

Sent: Wednesday, March 14, 2012 11:20 AM

To: Parish, Dana Cc: Gilbreath, Lisa A. Subject: Cintex Wireless

Hi Dana,

I hope you are doing well. Lisa Gilbreath forwarded to me the questions you have for Cintex. The following are Cintex's responses:

Cintex has sent out mailers and applications to a list of persons we received from Infogroup, Inc. We asked Infogroup to provide Cintex a list of low income persons within the geographic area in which Cintex is authorized to provide Lifeline service. Note that Infogroup is a well established company that assists businesses with direct mail campaigns. Cintex sent mailers to those persons only.

I'd like to emphasize that Cintex is aware that it is authorized to provide Lifeline service only in certain exchanges; Cintex had a vendor called BeQuick "convert" those exchanges into zip codes to ensure that it did not send advertisements to persons living in areas where Cintex is not authorized. We did not target AT&Ts customers or wireless customer per se.

We simply sent the mailers to persons who reside in our authorized area and who also have low incomes. These persons may not have any service provider at all.

The Cintex mailer states that documentation is required, as does the approved certification. We have been receiving documentation (e.g., copies of Medicaid cards) and will not provide service absent adequate documentation which supports the applicant's claim that they participate in a specified program.

Thus, far we have kept the documentation provided by the customers. The new FCC rules, however, specify that documentation should not be kept. Accordingly, we intend to start discarding the documentation. If the Missouri Commission believes that the documentation should be kept, please let me know.

Cintex is also scrubbing applicants against a database maintained by CGM, LLC, to minimize duplicates with other ETC providers. We will continue doing so until a national database is in place.

I do not believe that Cintex is providing service in Jefferson City. While we have coverage in Jefferson City, it does not appear to be in our authorized area. I have reviewed the zip codes where the mailers were sent and I do not believe that any were sent to Jefferson City.

Please let me know if you have further questions. If you wish, you can call me at (301) 363-4306.

Regards, Robert Felgar General Counsel (301) 363-4306

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