

**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)**

No. \_\_\_\_\_

**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 Section 214(e) of the Telecommunications Act of 1996 (the “1996 Act”), 47 U.S.C. § 214(e), and 47 C.F.R. §§ 54.101 through 54.207 (the “FCC Rules”), hereby requests that the Missouri Public Service Commission (the “Commission”) designate Stand Up Wireless as an Eligible Telecommunications Carrier (“ETC”) throughout the non-rural Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri (“AT&T Missouri”) exchanges described herein (the “Service Area”), for the purpose of receiving low-income federal universal service support for wireless services. In further support of its Application, Stand Up Wireless states as follows:

1. Global Connection Inc. of America is a Georgia corporation with its principal office located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Stand Up Wireless’ Articles of Incorporation and a Certificate of Good Standing are attached as **Exhibit “A”** hereto.

2. Correspondence or communications pertaining to this Application should be directed to Stand Up Wireless’ attorney of record:

Mark P. Johnson MO Bar #30740  
SNR Denton US LLP  
4520 Main, Suite 1100  
Kansas City, Missouri 64111  
Telephone: (816) 460-2424  
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and

Stanley Q. Smith  
WATKINS LUDLAM WINTER & STENNIS, P.A.  
190 E. Capitol Street, Suite 800 (39201)  
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Jackson, Mississippi 39205-0427  
Telephone: (601) 949-4863  
Facsimile: (601) 949-4804  
Email: stansmith@watkinsludlam.com

3. Questions concerning the ongoing operations of Stand Up Wireless following certification should be directed to:

David Skogen  
Chief Executive Officer  
Global Connection Inc. of America  
5555 Oakbrook Parkway, Suite 620  
Norcross, Georgia 30093  
Telephone: (678)741-6245  
Facsimile: (678)741-6333  
Email: dskogen@globalconnectioninc.com

4. A list of each AT&T Missouri wire center for which Stand Up Wireless is requesting ETC status in the state of Missouri is attached hereto as **Exhibit "B."** The Universal Service Fund was established, in part, to provide support to qualifying low-income communications end-users such as those serviced by Stand Up Wireless. Mechanisms were also established in an effort to moderate the amount of costs to be recovered through basic, recurring charges to low-income users, thereby assisting efforts to maintain reasonable basic rate levels.

5. Since January 1, 1998, a competitive local exchange carrier has qualified to receive the universal service support set forth above only if it has been designated by a state regulatory agency as an ETC. The Universal Service Fund therefore represents significant additional resources which could greatly benefit the consumers and businesses of the State of Missouri upon the designation of Stand Up Wireless as an ETC.

6. Pursuant to this Application, Stand Up Wireless requests ETC status solely for the purpose of providing the services supported by, and participating in the Low Income Programs of, the Federal Universal Service Fund. Such action is entirely consistent with both the 1996 Act and the public interest of the State of Missouri.

7. ETC designation will enhance Stand Up Wireless' ability to provide service to low income consumers within the Service Area, and since this Application is solely for the purpose of receiving low income universal service support, Stand Up Wireless' new wireless offering will supplement and not detract from the provision of supported services in such area. Stand Up Wireless will provide the supported services using a combination of its own facilities and resale of other carriers' services, and will advertise the availability of those services using media of general distribution. Under Stand Up Wireless' proposed Low Income wireless offering, each eligible wireless customer will receive a handset at no cost to the subscriber.

8. Consistent with the requirements of Section 214 of the Federal Communications Act of 1934, as amended, \*("Communications Act"), 47 U.S.C. §214(e)(6), and Sections 54.101 through 54.207 of the FCC Rules, Stand Up Wireless, in its provision of wireless services, will rely on a combination of resold services which the Company will obtain from underlying wireless providers that currently operate their own networks and Company-owned facilities, thus allowing Stand Up Wireless to meet the FCC's test that requires an ETC to provide services, at

least in part, through a “combination of its own facilities and resale of another carrier’s services”.<sup>1</sup> Stand Up Wireless owns and operates a Class 4 TDM Universal Gateway Switch which provides enhanced call routing and control for calls going to Directory Assistance and/or Operator Service providers.<sup>2</sup> The Switch provides an ETC-specific voice announcement and provides PSTN-grade service. Stand Up Wireless’ facilities description is attached hereto as **Exhibit “C”**. Due to the highly competitive nature of the telecommunications marketplace, Stand Up Wireless deems these materials to be proprietary. Accordingly, **Exhibit “C”** has been marked as confidential and is being submitted under seal to be maintained by the Commission and the Staff on a confidential basis.

9. Stand Up Wireless also obtains services through commercial mobile radio service (“CMRS”) providers that Stand Up Wireless uses in combination with the services provided through Company-owned facilities. Through these arrangements, Stand Up Wireless is able to offer all of the services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC Rules<sup>3</sup>, throughout its Service Area, thereby allowing the Company to provide service to its customers throughout the geographic area served by non-rural provider AT&T Missouri.

10. Currently, there is no state or federal definition or requirement as to the number of, or the amount of, the supported services that an ETC must offer via its “own facilities.” The ETC must provide some portion of the supported facilities through the use of the same, which Stand Up Wireless does. Therefore, Stand Up Wireless is able to meet the federal requirement that an ETC must offer the supported services at least in part through the use of its own facilities.

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

<sup>2</sup> Stand Up Wireless’ Gateway will also provide customers access to the Global Connection International Long Distance platform.

<sup>3</sup> See 47 C.F.R. § 54.101(a).

11. Assurance Home Phone will comply with all other provisions of the Commission's ETC rules. By way of illustration, within thirty days of receiving Commission approval of this Application, Assurance Home Phone will make an informational filing which describes the terms and conditions of the wireless offerings for which it will seek USF support, and that it will amend that filing from time to time, as its service offerings evolve, pursuant to 4 CSR 240-3.570(3)(D).

12. Pursuant to 4 CSR 240-3.570(3)(F), the Applicant shall, within ten (10) days of a change in the company-designated contacts, either notify the manager of the Telecommunications Department, in writing or by electronic mail, or shall update the commission's electronic filing system (EFIS). The notification or update shall include the name(s), address(es) and/or telephone number(s) of the designated individual(s). The contact name(s) provided pursuant to this section shall be the individual(s) primarily responsible for: customer service; repair and maintenance; answering complaints; authorizing and/or furnishing refunds to customer; and informational or tariff filing issues.

13. Designation of Stand Up Wireless as an ETC on a wireless basis is in the public interest of the State of Missouri and its low-income telecommunications end-users. Under the 1996 Act, "[u]pon request and consistent with the public interest, convenience and necessity"<sup>4</sup> the Commission shall "designate more than one common carrier as an eligible telecommunications carrier for a service area designated"<sup>5</sup> by the Commission. In doing so, the Commission "shall find that the designation is in the public interest".<sup>6</sup> The FCC Rules require that an ETC application demonstrate that designation would be consistent with the public

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<sup>4</sup> 47 C.F.R. § 54.201(c).

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

interest, convenience and necessity, and that prior to designating an ETC pursuant to section 214(e)(6), the Commission “shall consider the benefits of increased consumer choice, and the unique advantages...of the applicant’s service offering”.<sup>7</sup> Pursuant to this requirement, and consistent with 47 C.F.R. § 202(c) and 4 CSR 240-3.570(2)(A) 5, Stand Up Wireless provides the following information which clearly demonstrates that Stand Up Wireless’ designation as an ETC on a wireless basis is consistent with the public interest, convenience and necessity, providing consumers with better value through the offering of a unique service.

The FCC has also identified factors that are to be considered in determining whether designation of additional ETCs will serve the public interest such as whether the benefits of an additional ETC would outweigh potential harms. These factors include: 1) the benefits of increased consumer choice; and 2) the unique advantages and disadvantages of the company’s service offerings.<sup>8</sup> Stand Up Wireless affirms that its ETC designation meets these criteria as described below.

(a) **Increased Consumer Choice.** The FCC has determined that while designation of competitive ETCs promotes and benefits consumers by increasing customer choice, designation must include “an affirmative determination that such designation is in the public interest regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.”<sup>9</sup> Stand Up Wireless is seeking ETC designation on a wireless basis which will provide an additional valuable alternative to the existing telecommunications services currently available in these areas and will promote availability and facilitate the provision of advanced communications services to low-income residents of Missouri.

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<sup>7</sup> 47 C.F.R. § 54.202(c).

<sup>8</sup> See 47 C.F.R. § 54.202(c).

<sup>9</sup> See Federal-State Joint Board on Universal Service, 20 FCC Rcd 6371, ¶ 42 (2005)

The public interest benefits of inclusion of the Company's wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 9-1-1 service and, where available, E 9-1-1 service in accordance with current FCC requirements.

The inclusion of toll calling as a part of Stand Up Wireless' basic wireless offering (StandUp 100), along with the fact that service is provided without a monthly recurring charge, will allow consumers to avoid the risk of becoming burdened with large and unexpected charges for domestic toll calling and unexpected overage charges while remaining in touch with friends and family in other parts of the country.

Designation of the Company as an ETC on a wireless basis will also provide other carriers serving the same area an incentive to improve their existing networks and service offerings in order to remain customer focused, which will result in improved consumer services and will also benefit consumers by allowing Stand Up Wireless to offer the services designated for support at rates that are "just, reasonable, and affordable."<sup>10</sup>

As provided by the 1996 Act, the availability of basic telecommunications services to low-income consumers is critical to the provision of public health, safety, and other services. In addition, the FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of telecommunications services they provide.<sup>11</sup> This is of particular interest in cases where wireless providers, such as Stand Up Wireless, seek to provide services as alternatives to those of the traditional ILEC. In

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<sup>10</sup> See 47 U.S.C. § 254(b)(1).

<sup>11</sup> See e.g., *Specialized Common Carrier Services*, 29 FCC 2d 870 (1971).

the *Highland Cellular*<sup>12</sup> case, the FCC recognized and affirmed that some households may not have access to the public switched network as provided by the incumbent local exchange carrier. The availability of a wireless competitor benefits consumers who routinely rely on alternative transportation to attend work or school or to accomplish everyday tasks such as shopping or attending community and social events. The wireless service offered by Stand Up Wireless will provide these consumers with a convenient and affordable alternative to traditional telecommunications service that can be used while at home and away from home.

Stand Up Wireless' Lifeline and Link-Up programs will enable thousands of residents to obtain wireless service which would otherwise be unavailable to them. The economic circumstances indicate that low-income individuals, now more than ever, can greatly benefit from the advantages offered by Stand Up Wireless' Lifeline and Link-Up service thus allowing those adversely impacted by the failing economy or job loss to have access to a free wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

It is also a commonly accepted fact that in today's market, all consumers, including qualified Lifeline and Link-Up customers view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location.

Added together, Stand Up Wireless expects these additional competitive advantages to create an atmosphere that will cause many qualified consumers, at their option, to

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<sup>12</sup> Federal-State Joint Bd. on Universal Serv., *Highland Cellular, Inc., Memorandum Opinion and Order*, 19 F.C.C.R. 6422 (2004).



select the Company's low income wireless Lifeline and Link-Up service in lieu of the more traditional wireline or wireless services.

**(b) The Unique Advantages of Stand Up Wireless Service Offerings.**

Stand Up Wireless seeks ETC designation throughout the Service Area. Stand Up Wireless' expansive Service Area, combined with its use of thousands of authorized retail partners for enrollment verification and payment (as required) will bring service to more underserved citizens and will make ordering and maintaining service easier on the consumer. Authorized retail partners will include all Western Union and MoneyGram locations and independent operators including insurance providers, check cashing locations and select discount retailers.

Stand Up Wireless will offer a unique, customer friendly, flexible and highly affordable wireless telecommunications service, which it will make available to qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution. Stand Up Wireless allows flexibility to its customers in that it allows customers to upgrade and downgrade their plans to meet their specific needs and financial budget. Customers on paid plans are downgraded automatically if they are unable to pay for their selected paid plan.

Stand Up Wireless will announce and advertise telecommunications services as an ETC where it provides service in its Service Area and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Stand Up Wireless has used many mediums for outreach, including mass media, outreach events, and community and charitable involvement. Accordingly, more low-income Missouri residents will be made aware of the opportunities afforded to them under the Lifeline and Link-Up programs and will be able to take advantage of those opportunities by subscribing

to Stand Up Wireless' service. A sample of Stand Up Wireless' planned advertising is attached hereto as **Exhibit "D."**

Stand Up Wireless will provide universal service as an ETC in all of its Service Area.

Stand Up Wireless is willing to accept carrier of last resort obligations throughout the universal service areas in which Stand Up Wireless is designated as an ETC by the Commission.

Stand Up Wireless will provide equal access to long distance carriers, to the extent to which it is able to do so.

Stand Up Wireless offers a local usage plan comparable to the one offered by the ILEC in the service areas for which it seeks designation.

(c) **Stand Up Wireless Lifeline Plan.** Stand Up Wireless' free Lifeline plan (StandUp 100) includes separate pools of both voice minutes and text minutes. Competing Lifeline wireless providers typically deplete voice minutes when text is used, reducing the available voice minutes available to customers and thereby reducing the provider's per customer cost because text messaging costs are typically much lower than voice minute costs. According to Pew Research Center, in May 2010, seventy-two percent (72%) of adults reported sending or receiving a text message.<sup>13</sup> Since text messages draw from their own pool, Stand Up does not deplete the pool of voice minutes available for use of text messages and vice versa. Separate pools for both voice minutes and text messages are in the consumers' best interest as it preserves critical voice minutes for consumers who utilize text messaging.

Under the Company's Wireless Lifeline Plan, Stand Up Wireless customers will have several options to choose from, beginning with StandUp 100. In addition to StandUp 100, customers will also be permitted to select one of Stand Up Wireless' alternative plans, which offer customers the opportunity to receive more text units and voice units. Such alternative plans

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<sup>13</sup> Amanda Lenhart, *Adults, Cell Phones and Texting*, Pew Research Center Publications, September 2, 2010.

will be offered to Lifeline customers at a subsidized rate. Where Stand Up Wireless customers select an alternative plan, Stand Up Wireless will apply the total Lifeline subsidy of \$13.50 per month, including company contribution, to the retail rate of the alternative plan. Competing Lifeline wireless providers typically offer only a base package with required retail top up to add more voice minutes and/or texts. The initial plans offered by Stand Up Wireless are as follows:

(i) **StandUp 100.** Stand Up Wireless will provide qualified Lifeline customers who reside in the State of Missouri with a monthly allotment of 100 free anytime local and long distance minutes and 100 free SMS text messages and will use all low-income universal service support to allow the Company to provide the service with no monthly recurring charge, thus ensuring that the consumer receives 100% of all universal service support funding for which the Company will seek reimbursement of USF Lifeline support necessary to provide the free minutes of airtime above. Unused minutes and unused SMS text messages will rollover from month to month. Other rate plans are also available to Lifeline qualified customers.

(ii) **StandUp 500.** Stand Up Wireless expects to provide qualified Lifeline customers who reside in the State of Missouri with a monthly allotment of 500 anytime local and long distance minutes and 500 SMS text messages at a cost of \$14.95 plus taxes and fees per month. Unused minutes and unused SMS text messages do not rollover from month to month in this plan.

(iii) **StandUp 1000.** Stand Up Wireless expects to provide qualified Lifeline customers who reside in the State of Missouri with a monthly allotment of 1000 anytime local and long distance minutes and 1000 SMS text messages at a cost of \$29.95 plus taxes and fees per month. Unused minutes and unused SMS text messages do not rollover from month to month in this plan.

(iv) **StandUp Unlimited.** Stand Up Wireless expects to provide qualified Lifeline customers who reside in the State of Missouri with unlimited voice minutes for \$34.95 plus taxes and fees per month; however this plan does not include SMS text messaging. Unused minutes do not rollover from month to month in this plan.

(v) New Stand Up Wireless customers must choose a plan upon enrollment. If the customer selects a non-FREE plan, payment must be made directly to Stand Up Wireless or one of its designated payment agent locations prior to activation of service. Existing Stand Up Wireless customers who wish to switch plans may do so at [www.StandUpWireless.com](http://www.StandUpWireless.com) or by calling a toll free number. Stand Up Wireless customers who select one of the three (3) non-FREE plans must make payment for their upcoming service period five (5) days prior to service period end date. Customers who fail to make payment prior to the deadline will be automatically changed to the free Stand UP 100 plan with 100 free airtime minutes and 100 free SMS text messages for the subsequent service period.

Calls to Stand Up Wireless customer service made by customers via their Stand Up Wireless phone will not deplete the customer's available airtime. Stand Up customers can contact Stand Up Wireless customer service by dialing a short code (e.g. \*611) from their Stand Up Wireless phone to address billing, service and general account issues with all voice minutes used in association with such calls being credited to the customer's account. Customers whose balance of voice minutes has been exhausted will still be able to make outbound calls to 911 as well as Stand Up Wireless customer service as long as their service is active.

In the event that all airtime subscribed to has been used, by Lifeline Customers will have the ability to purchase additional time. At this time additional credits may be purchased at the rate of \$5.00 for 40 credits; \$10.00 for 100 credit; \$20.00 for 250 credits, \$30.00 for 500 credits;

and \$50.00 for 1000 credits by calling our toll free number or at [www.StandUpWireless.com](http://www.StandUpWireless.com). Credits may also be purchased at any authorized Stand Up Wireless payment center. Each credit provides one (1) minute of airtime or one (1) SMS text message.

The wireless plan will also include a free handset and the following Custom Calling features:

- (1) Caller ID;
- (2) Call Waiting;
- (3) Call Forwarding;
- (4) 3-Way Calling
- (5) Voicemail.

Wireless handsets will be delivered at no charge to qualifying customers, service will be activated, and the requisite number of minutes will be added upon certification of the customer for Lifeline and Link-Up.

(e) **Stand Up Wireless' Link-Up Plan.** Consistent with FCC requirements, Stand Up Wireless will use Link-Up support to reduce the company's "customary charge for commencing service" by "half of the customary charge..."<sup>14</sup>, which will result in a reduction of the Company's standard \$68.00 wireless activation charge.

Qualifying subscribers may request a deferred payment schedule for the remaining installation charges, if any thus allowing subscribers to obtain service without being required to pay any fees to activate service with Stand Up Wireless. As such, there is no up-front connection charge applicable to Stand Up Wireless Lifeline customers.

(f) **Designation of Stand Up Wireless as an ETC Will Benefit Low Income Consumers in the State of Missouri.** Under the FCC Rules, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards<sup>15</sup>;

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<sup>14</sup> *Id.*

<sup>15</sup> 47 C.F.R. §54.202(a)(3), 62 Fed. Reg. 15,978 at Para 28.

Stand Up Wireless will satisfy all such standards. Stand Up Wireless is committed to complying with the Cellular telecommunications and Internet Association's ("CTIA's") Consumer Code. In addition, Stand Up Wireless commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's USF Order.<sup>16</sup> Stand Up Wireless in general commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

Under the FCC Rules, an ETC applicant must demonstrate its ability to remain functional in emergency situations<sup>17</sup>. Since Stand Up Wireless is providing service to its customers through the use of facilities obtained from other carriers, this arrangement allows Stand Up Wireless to provide to its customers the same ability to remain functional in emergency situations as currently provided by the carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Facilities owned by Stand Up Wireless are collocated in a Tier 1 carrier's switching center, which is capable of remaining fully functional with both generator and battery back-up.

In keeping with Stand Up Wireless' corporate philosophy, it will continue to adjust its offering to benefit Missouri consumers by presenting new and unique plans as Stand Up Wireless expands and invests in Missouri. As such, the service for which Stand Up Wireless seeks ETC status is unique. Stand Up Wireless will not only enter the market, it will lead the market.

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<sup>16</sup> USF Order at Para 4.

<sup>17</sup> 47 C.F.R. § 54.202(a)(2); USF Order at Para 25.

Inclusion of the Company's wireless service will serve the public interest by increasing participation of qualified consumers in the Lifeline and Link-Up programs, thereby contributing to an overall increase in the number of Missouri residents receiving Lifeline and Link-Up and an increase to the amount of federal USF dollars benefiting Missouri residents.

Finally, inclusion of Stand Up Wireless' wireless service will serve the public interest by furthering the extensive role that Stand Up Wireless believes it will play in the provision of communications service to low-income consumers, transient users, and other consumers who, due to the restrictive credit criteria, deposit requirements, and long-term commitments of traditional service providers, are off network and, without any viable alternative, are likely to remain so.

(g) **Designation of Stand Up Wireless on a Wireless Basis Will Impose a Negligible Impact on the USF.** Stand Up Wireless reiterates that it is applying for ETC designation solely for the purpose to provide Lifeline and Link-Up discounts to qualified low-income consumers and to seek reimbursement for the same and will not seek or accept High Cost support. Because Stand Up Wireless seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a network construction plan is not required. Since Lifeline support is designed to reduce the monthly cost of telecommunication services for eligible consumers, is distributed on a per-customer 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. In addition, designation of the Company as an ETC will not pose

any adverse effect in the growth in the high cost portions of the USF, nor will it create or contribute to an erosion of high cost funding from any rural or non-rural telephone company.

The FCC reaffirmed this position when it stated that “the potential growth of the fund associated with high-cost support distributed to competitive ETCs” is not relevant to carriers seeking support associated with the low-income program.<sup>18</sup> Accordingly, total low-income support for 2007 accounted for only 11.8 percent of the total distribution of the USF, with high-cost accounting for over 61 percent of the total.<sup>19</sup>

The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the fund when it stated that “any increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible participation in the Lifeline and Link-Up programs, furthering the statutory goal of providing access to low-income consumers.”<sup>20</sup>

In addition, 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.

**(h) Stand Up Wireless Has Internal Controls in Place to Prevent Subscribers from Receiving More Than One Lifeline Discount.** Consistent with federal

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<sup>18</sup> Petition of TracFone Wireless, Inc. for Forbearance from 47 U.C.S § 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) at ¶ 17.

<sup>19</sup> 2008 Wireline Competition Bureau, FCC, *Trends in Telephone Service*, Chart 19.1.

<sup>20</sup> TracFone Forbearance Order, at ¶ 17.



requirements, Stand Up Wireless requires customers to certify at the time of service activation and annually thereafter that they: 1) are the head of household; 2) participate in one of the state-approved means tested programs; 3) will be receiving Lifeline-supported services only from Stand Up Wireless; 4) do not currently receive Lifeline support; and 5) will notify Stand Up Wireless in the event that they no longer participate in the qualifying program. Verification of continued eligibility is accomplished by Stand Up Wireless annual certification/verification process, in strict compliance with state and federal guidelines.

14. Where available and conditions warrant, Stand Up Wireless can capture a customer's signature electronically on any web accessible computer or electronic tablet computer (iPad or similar) with the enrollment form on the screen. In those circumstances, customers would sign their applications using their finger, stylus or mouse, and the application would be stored digitally. All digital submissions will automatically be verified against the United States Postal Service database for address verification as well as scrubbed against both Stand Up Wireless' current customer enrollment and Global Connection's landline enrollment to help ensure no duplicate orders are processed for the same head of household/household address. This process would also be web enabled allowing customers to complete their applications online at [www.StandUpWireless.com](http://www.StandUpWireless.com) and applications would be signed electronically.

15. In order to be designated as an ETC, the FCC Rules require that carriers must publicize and offer the list of services supported by the federal universal service mechanisms. As demonstrated below, Stand Up Wireless satisfies these requirements and should be granted ETC status. Under federal rules, the ETC must offer the following services:

- a) Voice grade access to the public switched network, provided through interconnection arrangements with local telephone companies, with the same level

of access to the public switched telephone network for its wireless customers.

Subscribers will receive this service at bandwidths between 300 and 3,000 hertz, as required by 47 C.F.R. §54.101(a)(1);

- b) Access to free-of-charge: “local usage” defined as an amount of minutes of use of exchange service, and Company rate plans will provide a variety of local usage levels, consistent with Section 54.101(a)(2) of the FCC’s Rules. As described above, Lifeline customers will be offered a toll-free local usage plan within the company’s service area as a part of its monthly service package options.;
- c) Dual tone multi-frequency signaling or its functional equivalent, in that the Company will provide dual tone multi-frequency (“DTMF”) signaling to facilitate the transportation of signaling throughout its network. This technology that shortens call set-up time and makes “touchtone” dialing possible by facilitating the transportation of signaling through the network. The Company will provide its wireless customers with wireless signaling that is the functional equivalent of DTMF signaling, in accordance with the FCC’s requirements;
- d) Single-party service or its functional equivalent: only one party will be served by a subscriber loop or access line in contrast to a multi-party line. The Company provides single party service, as that term is defined in 47 C.F.R. Section 54.101;
- e) Access to emergency services: the Company will provide 911 access to emergency services throughout its service area, relying on its underlying carrier(s);
- f) Access to operator services: the Company will provide customer access to operator services through the traditional manner by dialing “0”;

- g) Access to interexchange services: the Company's interconnection arrangements with interexchange carriers will enable the company's customers to access to interexchange services. Customers will also be able to "dial around" to reach their interexchange carrier of choice;
- h) Access to directory assistance: subscribers will be able to dial "411" or "555-1212" to reach directory assistance from their mobile phones; and
- i) Toll limitations services for qualifying low-income customers: the Company has toll limitation capabilities which will allow it to provide toll limitation service for Lifeline wireless customers.

16. As described above, qualified ETCs must offer these services either using their own facilities or a combination of their own facilities and the resale of services of another facilities-based carrier. Further, ETCs must advertise the availability of, and the prevailing prices for, the universal services throughout the area in which they have been designated an ETC. Stand Up Wireless will comply with each of these requirements regarding service provisions and advertisement, and Stand Up Wireless will utilize all universal service support for the provision, maintenance, and upgrading of the supported services.

17. Stand Up Wireless attaches hereto as **Exhibit "E"** and incorporates herein by reference financial statements showing that it has the financial qualifications to provide the services specified herein. The Financial Statements contain confidential proprietary and financial information not generally available to the public. Due to the highly competitive nature of the telecommunications marketplace, Stand Up Wireless deems this material to be proprietary. Accordingly, the financial statements have been marked as confidential and are being submitted

under seal to be maintained by the Commission and the Staff on a confidential basis pursuant to applicable law and Commission Rules.

18. Stand Up Wireless attaches as **Exhibit "F"** the current list of its officers, along with biographical information for each.

19. Attached hereto as **Exhibit "G"** is information regarding the handsets issued by Stand Up Wireless to its customers.

20. Attached hereto as **Exhibit "C"** is a summary of the wireless facilities owned by Stand Up Wireless through which Stand Up Wireless proposes to offer wireless service in combination with resold services. Stand Up Wireless' wireless directory assistance traffic will flow the Class 5 switch per the network schematic. **Exhibit "C"** contains confidential proprietary information not generally available to the public. Due to the highly competitive nature of the telecommunications marketplace, Stand Up Wireless deems this material to be proprietary. Accordingly, **Exhibit "C"** has been marked as confidential and are being submitted under seal to be maintained by the Commission and the Staff on a confidential basis.

21. Pursuant to 4 CSR 240-3.570(3)(A), the Applicant shall develop a bill design that can be easily interpreted by its customers and clearly sets forth charges in compliance with state and federal billing requirements.

22. Pursuant to 4 CSR 240-3.570(3)(B), the Applicant shall provide customer service contact information online and on billing statements. Applicant acknowledges that this requirement also applies to ETCs that use a third party billing agent.

23. Pursuant to 4 CSR 240-3.570(3)(E), the Applicant shall maintain a record of customer complaints that have been received by the company in a manner that includes, at a minimum: the end-user name; the account number; a description of the complaint; the date the

complaint was filed; the resolution; and the amount of refund or credit, if any. Applicant shall also maintain record of complaints from consumers in the Missouri service area in which ETC designation was granted that have been submitted to or filed with the Federal Communications Commission for which the company has knowledge in a manner that includes, at a minimum: a description of the complaint; the date the complaint was filed; the date the complaint was resolved; the resolution of the complaint and the amount of refund or credit, if any.

### **CONCLUSION**

Having demonstrated that Stand Up Wireless satisfies the conditions necessary for designation as an ETC in Missouri, and having shown that the public and universal service interests of the telecommunications consumers of the State of Missouri will be properly served, Stand Up Wireless respectfully requests that the Commission designate Global Connection Inc. of America, d/b/a Stand Up Wireless , as an ETC for the provision of low income support on a wireless basis throughout Stand Up Wireless' Service Area.

Respectfully submitted,

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

By: /s/Mark P. Johnson

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### CERTIFICATE OF SERVICE

I hereby certify that I have this the 23rd day of March, 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/Mark P. Johnson  
Mark P. Johnson

## **EXHIBITS**

- Exhibit A - Articles of Incorporation and Certificate of Good Standing
- Exhibit B - Wire Centers
- Exhibit C - Wireless Facilities Information (filed under seal)
- Exhibit D - Wireless Marketing Materials and Enrollment Form
- Exhibit E - Financial Information (filed under seal)
- Exhibit F - Management Bio
- Exhibit G - Information Regarding Handsets

**VERIFICATION**

STATE OF Georgia  
COUNTY OF Gwinnett

PERSONALLY came and appeared before me, the undersigned party in and for the jurisdiction aforesaid, the within named Dave Skogen who after being duly sworn by me stated under oath as follows: that I am Chief Executive Officer of Global Connection Inc. of America d/b/a Stand Up Wireless ("Stand Up Wireless"), a telephone service provider; that I executed the foregoing pleading for and on behalf of Stand Up Wireless ; that I am authorized to execute and file said pleading; and that the matters and things set forth in said pleading are true and correct to the best of my knowledge, information and belief.

\_\_\_\_\_  
Dave Skogen

SWORN TO AND SUBSCRIBED before me on this the 15<sup>th</sup> day of March, 2011.

[Signature]  
\_\_\_\_\_  
NOTARY PUBLIC

