

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * *

In the matter of the application of)	
GLOBAL CONNECTION INC. OF AMERICA,)	
d/b/a STAND UP WIRELESS, for designation as)	Case No. U-16577
an eligible telecommunications carrier pursuant to)	
Section 214(e)(2) of the Communications Act of)	
1934, as amended.)	

**APPLICATION OF GLOBAL CONNECTION INC. OF AMERICA
d/b/a STAND UP WIRELESS TO EXPAND ITS
ELIGIBLE TELECOMMUNICATIONS CARRIER SERVICE AREA**

I. INTRODUCTION

Global Connection Inc. of America, d/b/a Stand Up Wireless (“STANDUP” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Michigan Public Service Commission (“Commission”), hereby files this application to expand STANDUP’s Eligible Telecommunications Carrier (“ETC”) service area in the State of Michigan (“Application”). STANDUP was designated as a Lifeline-only wireless ETC by Commission Order issued June 26, 2012 in the instant docket (“ETC Designation Order”). STANDUP requests to expand its ETC service area to provide Lifeline service to additional qualifying non-tribal

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

Michigan households, as well as to provide enhanced Lifeline services to eligible residents of federally recognized tribal lands (“Tribal” customers).

As demonstrated herein, and as certified by Exhibit 1 attached hereto, STANDUP continues to meet all statutory and regulatory requirements for designation as an ETC, including those set forth in the FCC’s *USF/ICC Transformation Order*,³ *Lifeline and Link Up Reform Order*,⁴ *Lifeline Modernization Order*,⁵ and *Fifth Report and Order*.⁶ The Company does not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high-cost areas.⁷ Rapid grant of STANDUP’s request would advance the public interest by enabling the Company to expand the availability of Lifeline service to many more low-income consumers in Michigan. Accordingly, STANDUP respectfully requests that the Commission expeditiously approve this Application.

³ *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 a 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. 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*”).

⁴ *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 and Link Up Reform Order*”).

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 00-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*Third Report and Order*” or “*Lifeline Modernization Order*”).

⁶ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, “*Fifth Report and Order*”).

⁷ Given that STANDUP only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

With a copy to the Company's local counsel:

Eric T. Weiss (P41687)
Finkel Whitefield Selik
Attorneys and Counselors at Law
32300 Northwestern Highway, Suite 200
Farmington Hills, Michigan 48334
(248) 855-6500 (Phone)
(248) 855-6501 (Fax)
E-Mail: eweiss@fwslaw.com

II. DESIGNATED SERVICE AREA

In the ETC Designation Order, the Commission designated STANDUP as an ETC referencing the wire centers listed in Amended Exhibit A to the November 21, 2011 supplemental filing to the Company's initial application. STANDUP provides wireless Lifeline service to eligible Michigan Lifeline customers utilizing the underlying facilities-based wireless network of T-Mobile. The Company understands that T-Mobile's network has access to a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. As a reseller of T-Mobile's services, STANDUP and its customers benefit from this functionality. STANDUP seeks to expand its ETC designated service area to be statewide subject to the coverage of its underlying carrier, a map of which is included in attached Exhibit 2 along with a corresponding wire center list.

STANDUP's ETC service area, as expanded, will cover the following Tribal areas: Bay Mills Indian Community; Grand Traverse Band of Ottawa and Chippewa Indians; Hannahville Indian Community; Keweenaw Bay Indian Community; Lac Vieux Desert Band of Lake Superior Chippewa Indians; Little River Band of Ottawa Indians; Little Traverse Bay Bands of Odawa Indians; Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan; Nottawaseppi Huron Band of the Potawatomi; Pokagon Band of Potawatomi Indians; Saginaw Chippewa Indian Tribe of Michigan; and Sault Ste. Marie Tribe of Chippewa Indians. STANDUP is providing notice to these tribes of the instant Application concurrent with the filing thereof, and will seek to meaningfully engage with such tribes to enhance the provision of its Lifeline service on the respective tribal lands.

III. STANDUP MEETS APPLICABLE REQUIREMENTS

FCC rules, 47 C.F.R. §§ 54.201-54.202 (the "FCC ETC Rules"), set forth the information that must be contained in an application for designation as an ETC. In its initial and supplemental applications for designation as an ETC filed in this docket ("ETC Application"), STANDUP provided all of the information required by FCC ETC Rules in effect at the time. STANDUP further notified the Commission in March 2017 of a change in the Company's ownership.⁸ STANDUP incorporates those filings herein. The Commission found in its ETC Designation Order that STANDUP met the requirements for designation as an ETC. STANDUP has complied with the conditions of its ETC designation and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and by the attached certification, STANDUP certifies that it will comply with the service requirements applicable to the support that it receives. STANDUP hereby also provides

⁸ See *Notification of Global Connection Inc. of America Regarding a Transfer of Control*, Case No. U-16577 (filed March 16, 2017). A copy of STANDUP's revised Compliance Plan approved by the FCC as a requirement of the transfer of control is attached hereto as Exhibit 3.

additional and updated information as a result of the FCC's *Lifeline Modernization Order*, which was issued after the Company's ETC Designation Order.

A. Provision of Supported Services

STANDUP is able to provide all services 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 its requested service area in the State of Michigan, including broadband Internet access service ("BIAS"). STANDUP commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. The Company's current Lifeline offering is attached hereto as Exhibit 4. STANDUP currently offers these Lifeline wireless plans throughout its existing service area in Michigan and, upon approval of the instant Application, intends to offer these plans, as well as the proposed Tribal rate plan, throughout all areas of the state where its underlying carrier has sufficient wireless network coverage.

B. Eligibility Verification

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Lifeline Eligibility Verifier (the "National Verifier"), which transfers the responsibility of eligibility determination away from Lifeline providers.⁹ STANDUP must rely on the National Verifier to determine initial and ongoing eligibility of Michigan Lifeline subscribers, and through doing so, STANDUP also complies with the requirements of the National Lifeline Accountability Database ("NLAD") and section 54.404 of the FCC's rules. The National Verifier queries the NLAD for every enrollment to determine whether a prospective subscriber is currently receiving

⁹ See *Lifeline Modernization Order*, section III.C.

a Lifeline service from STANDUP or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.

C. Non-Usage Policy

In compliance with federal regulations, STANDUP will not seek reimbursement from the USF for inactive subscribers and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), STANDUP will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage.

IV. EXPANSION OF STANDUP'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST

In its ETC Designation Order, the Commission found that designation of STANDUP as an ETC would serve the public interest. Expansion of STANDUP's ETC service area will further the public interest by providing more low-income Michigan consumers with low-priced and high-quality services. STANDUP's 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 prevented many low-income Americans from reaping the full benefits of the intensely competitive wireless market.

In today's market, consumers, including qualified Lifeline 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 greater

ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers regardless of location. Mobile Lifeline service is essential not only for access to telephone service, but also to bridging the digital divide through provision of mobile broadband usage which is critical to full participation in modern society.

STANDUP's Lifeline offerings provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (with plan options meeting the broadband minimum service standards), at no net cost to the customer after application of Lifeline support. Expansion of STANDUP's ETC service area will increase the number of low-income individuals that can benefit from the advantages offered by the Company's Lifeline service, ensuring they have access to wholly supported or discounted wireless voice and broadband service.

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 STANDUP with the authority necessary to offer discounted Lifeline services to eligible residents in additional areas of Michigan—especially to Tribal customers who “have historically had less access to telecommunications services than any other segment of the population”¹⁰—undoubtedly promotes the public interest.

¹⁰ See *USF/ICC Transformation Order* at para. 479.

V. CONCLUSION

STANDUP submits that the information contained herein, together with the information in the Company's initial ETC Application, incorporated herein by reference, demonstrates that STANDUP meets the requirements for ETC designation and that expansion of the Company's ETC service area will serve the public interest.

WHEREFORE, STANDUP respectfully requests that the Commission promptly grant this Application and expand STANDUP's Lifeline-only ETC service area as requested herein.

Respectfully submitted,

s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

and

Eric T. Weiss (P41687)
Finkel Whitefield Selik
Attorneys and Counselors at Law
32300 Northwestern Highway, Suite 200
Farmington Hills, Michigan 48334
(248) 855-6500 (Phone)
(248) 855-6501 (Fax)
E-Mail: eweiss@fwslaw.com

*Attorneys for Global Connection Inc. of America
d/b/a STANDUP WIRELESS*

March 18, 2025

EXHIBIT 1

CERTIFICATION

CERTIFICATION

I, Tina Allen, the Compliance Officer of Global Connection Inc. of America d/b/a Stand Up Wireless (“STANDUP”), hereby certify that I have read STANDUP’s Petition to expand its Eligible Telecommunications Carrier Service Area and know the contents thereof; and affirm under penalty for perjury that the contents are true and correct to the best of my knowledge, information and belief. I further certify that STANDUP will comply with the service requirements applicable to the low-income universal service support that it receives.

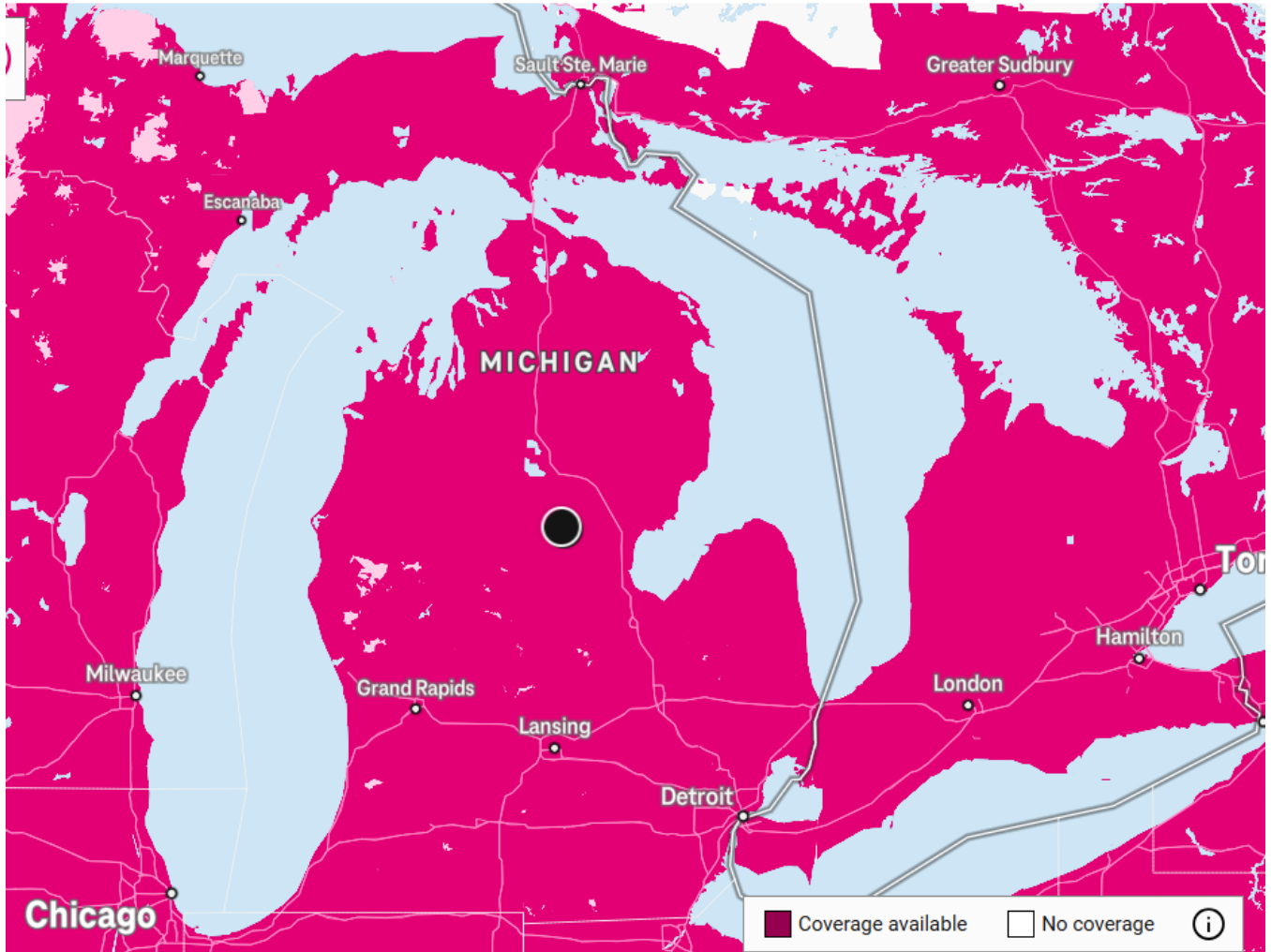
Global Connection Inc. of America
d/b/a Stand Up Wireless

By: 
Tina Allen, Compliance Officer

Date: 2/14/2025

EXHIBIT 2

**Proposed Expanded Service Area
(Statewide Subject to Underlying Carrier Coverage)**



CLLI	COMPANY NAME	RATE CENTER
ABHGMIMN	AMERITECH MICHIGAN	AUBURN HTS
ABHGMIMN	AMERITECH MICHIGAN	BIRMINGHAM
ABHGMIMN	AMERITECH MICHIGAN	TROY
ABHLMIBH	AMERITECH MICHIGAN	PONTIAC
ACMEMIMN	AMERITECH MICHIGAN	TRAVERSECY
ADA MIMN	AMERITECH MICHIGAN	ADA
ADRN MIXG	FRONTIER NORTH, INC. - MI	ADRIAN
ADSN MIXI	FRONTIER MIDSTATES, INC. - MI	ADDISON
ADVLMIXG	FRONTIER NORTH, INC. - MI	EDWARDSBG
AGSTMIXJ	COMMUNICATIONS CORP. OF MICHIGAN	AUGUSTA
ALBNMIMN	AMERITECH MICHIGAN	ALBION
ALDLMIXJ	ALLENDALE TELEPHONE CO.	ALLENDALE
ALDLMIXJ	ALLENDALE TELEPHONE CO.	COOPERSVL
ALDN MIXH	FRONTIER NORTH, INC. - MI	ALDEN
ALGNMIMN	AMERITECH MICHIGAN	ALGONAC
ALGR MIXJ	FRONTIER MIDSTATES, INC. - MI	ALGER
ALLGMIXG	FRONTIER NORTH, INC. - MI	ALLEGAN
ALLN MIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	ALLEN
ALMAMIXG	FRONTIER NORTH, INC. - MI	ALMA
ALMT MIXG	FRONTIER NORTH, INC. - MI	ALMONT
ALNS MIXJ	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	ALANSON
ALPE MIXG	FRONTIER NORTH, INC. - MI	ALPENA
ALTN MIXI	BARAGA TELEPHONE CO.	ALSTON
ALTMIMN	AMERITECH MICHIGAN	ALTO
AMBLMIAA	UPPER PENINSULA TELEPHONE CO.	AMBLE
AMSAMIMN	AMERITECH MICHIGAN	AMASA
ANARMIMN	AMERITECH MICHIGAN	ANN ARBOR
ANARMISE	AMERITECH MICHIGAN	ANN ARBOR
ANARMISE	AMERITECH MICHIGAN	YPSILANTI
ARMDMIMN	AMERITECH MICHIGAN	ARMADA
ASHY MIXL	FRONTIER NORTH, INC. - MI	ASHLEY
ATHNMIAT	AMERITECH MICHIGAN	ATHENS
ATLNMIXG	FRONTIER NORTH, INC. - MI	ATLANTA
AUBNMIMN	AMERITECH MICHIGAN	AUBURN
AUGRMIXJ	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	AU GRES
AUTRMIXI	CHATHAM TELEPHONE CO.	AU TRAIN
AVOC MIXG	FRONTIER NORTH, INC. - MI	AVOCA
BARG MIXJ	BARAGA TELEPHONE CO.	BARAGA
BATH MIXG	FRONTIER NORTH, INC. - MI	BATH
BBISMIXI	ISLAND TELEPHONE CO.	BOIS BLANC
BCHNMIMN	AMERITECH MICHIGAN	BUCHANAN
BCKLMIXI	ACE TELEPHONE CO. OF MICHIGAN, INC.	BUCKLEY
BDAXMIMN	AMERITECH MICHIGAN	BAD AXE

CLLI	COMPANY NAME	RATE CENTER
BELHMIMN	AMERITECH MICHIGAN	BEULAH
BGRPMIMN	AMERITECH MICHIGAN	BIG RAPIDS
BITNMIES	AMERITECH MICHIGAN	BRIGHTON
BLDLMIXI	BLOOMINGDALE TELEPHONE CO.	BLOOMINGDL
BLDNMIMN	AMERITECH MICHIGAN	BELDING
BLDWMIMN	AMERITECH MICHIGAN	BALDWIN
BLFDMIXG	FRONTIER NORTH, INC. - MI	BLISSFIELD
BLLRMIXG	FRONTIER NORTH, INC. - MI	BELLAIRE
BLLVMIMN	AMERITECH MICHIGAN	BELLEVUE
BLNCMIXI	BLANCHARD TELEPHONE CO.	BLANCHARD
BLOKMIXI	SHIAWASSEE TELEPHONE CO.	BELL OAK
BLVLMIBV	AMERITECH MICHIGAN	BELLEVILLE
BLVLMINE	AMERITECH MICHIGAN	BELLEVILLE
BNCRMIXG	FRONTIER NORTH, INC. - MI	BANCROFT
BNFDMIXI	BARRY COUNTY TELEPHONE CO.	BANFIELD
BNFLMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	BOYNEFALLS
BNGRMIXG	FRONTIER NORTH, INC. - MI	BANGOR
BNHLMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	BUNDY HILL
BNHRMIES	AMERITECH MICHIGAN	BENTON HBR
BNHRMIMN	AMERITECH MICHIGAN	BENTON HBR
BNHRMIMN	AMERITECH MICHIGAN	ST JOSEPH
BOCYMIBC	AMERITECH MICHIGAN	BOYNE CITY
BRCLMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	BORCULO
BRCRMIXJ	ONTONAGON COUNTY TELEPHONE CO.	BRUCECRSNG
BRDAMIXI	FRONTIER MIDSTATES, INC. - MI	BARODA
BRDGMIXI	FRONTIER MIDSTATES, INC. - MI	BRIDGMAN
BRHMMIMN	AMERITECH MICHIGAN	BIRMINGHAM
BRHMMIMN	AMERITECH MICHIGAN	ROYAL OAK
BRKLMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	BROOKLYN
BRLDMIMN	AMERITECH MICHIGAN	BERGLAND
BRLKMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	BEAR LAKE
BRMLMIXI	CHIPPEWA COUNTY TELEPHONE CO.	BRIMLEY
BRNTMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	BRANT
BROKMIXG	FRONTIER NORTH, INC. - MI	BURR OAK
BRPTMIMN	AMERITECH MICHIGAN	SAGINAW
BRPTMISO	AMERITECH MICHIGAN	SAGINAW
BRRGMIXG	FRONTIER NORTH, INC. - MI	BRECKENRDG
BRRNMIMN	AMERITECH MICHIGAN	BIRCH RUN
BRRVMIMN	AMERITECH MICHIGAN	BARK RIVER
BRSNMIXG	FRONTIER NORTH, INC. - MI	BRONSON
BRSPMIBS	AMERITECH MICHIGAN	BERRIENSPG
BRTHMIXI	KALEVA TELEPHONE COMPANY	BRETHREN
BRTNMIXG	FRONTIER NORTH, INC. - MI	BRITTON

CLLI	COMPANY NAME	RATE CENTER
BRTSMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	BRUTUS
BRYTMIXG	FRONTIER NORTH, INC. - MI	BARRYTON
BSMRMIMN	AMERITECH MICHIGAN	BESSEMER
BTCKMIBC	AMERITECH MICHIGAN	BATTLE CRK
BTCKMISO	AMERITECH MICHIGAN	BATTLE CRK
BTNGMIPG	AMERITECH MICHIGAN	FLINT
BURLMIXI	FRONTIER MIDSTATES, INC. - MI	BURLINGTON
BVTNMIVT	AMERITECH MICHIGAN	BEAVERTON
BWCYMIXG	FRONTIER NORTH, INC. - MI	BROWN CITY
BYCTMIMN	AMERITECH MICHIGAN	BYRON CTR
BYCYMIMN	AMERITECH MICHIGAN	BAY CITY
BYCYMIWS	AMERITECH MICHIGAN	BAY CITY
BYPTMIMN	AMERITECH MICHIGAN	BAY PORT
BYRNMIBY	AMERITECH MICHIGAN	BYRON
CALMMIMN	AMERITECH MICHIGAN	CALUMET
CAROMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	CARO
CARRMIXA	CARR TELEPHONE CO.	CARR
CATNMICT	AMERITECH MICHIGAN	CARLETON
CBVLMIXG	FRONTIER NORTH, INC. - MI	COLUMBIAVL
CDLCMIMN	AMERITECH MICHIGAN	CADILLAC
CDSPMIMN	AMERITECH MICHIGAN	CEDAR SPG
CDVLMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	CEDARVILLE
CDWLMIXG	FRONTIER NORTH, INC. - MI	COLDWTR LK
CDWRMIXG	FRONTIER NORTH, INC. - MI	COLDWATER
CEDRMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	GLEN LAKE
CHAPMIXI	FARMERS MUTUAL OF CHAPIN DBA CHAPIN TEL. CO.	CHAPIN
CHBYMIMN	AMERITECH MICHIGAN	CHEBOYGAN
CHBYMISO	AMERITECH MICHIGAN	CHEBOYGAN
CHHMMIXI	CHATHAM TELEPHONE CO.	CHATHAM
CHLKMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	CHIPPEWALK
CHLSMIMN	AMERITECH MICHIGAN	CHELSEA
CHMPMIMN	AMERITECH MICHIGAN	CHAMPION
CHNGMICR	AMERITECH MICHIGAN	CHANNING
CHRLMIMN	AMERITECH MICHIGAN	CHARLOTTE
CHSLMIMN	AMERITECH MICHIGAN	HOUGHTON
CHSNMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	CHESANING
CHVXMIMN	AMERITECH MICHIGAN	CHARLEVOIX
CKTNMIMN	AMERITECH MICHIGAN	CLARKSTON
CKTNMIMN	AMERITECH MICHIGAN	DRAYTON PL
CLARMICL	AMERITECH MICHIGAN	CLARE
CLDNMICL	AMERITECH MICHIGAN	CALEDONIA
CLFRMIXG	FRONTIER NORTH, INC. - MI	CLIFFORD
CLIOMIMN	AMERITECH MICHIGAN	CLIMTMORRS

CLLI	COMPANY NAME	RATE CENTER
CLMNMIMN	AMERITECH MICHIGAN	COLEMAN
CLMXMIXI	CLIMAX TELEPHONE CO.	CLIMAX
CLRKMIMN	AMERITECH MICHIGAN	CLARKLAKE
CLRVMIXH	FRONTIER NORTH, INC. - MI	CLAM RIVER
CLTNMIXG	FRONTIER NORTH, INC. - MI	CLINTON
CLVLMIMN	AMERITECH MICHIGAN	CLARKSVL
CMBAMIXJ	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	CAMBRIA
CMDNMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	CAMDEN
CMPKMICP	AMERITECH MICHIGAN	GRAND RPDS
CMRCMICM	AMERITECH MICHIGAN	COMMERCE
CMRCMINR	AMERITECH MICHIGAN	COMMERCE
CMRCMINR	AMERITECH MICHIGAN	DRAYTON PL
CNCRMIXJ	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	CONCORD
CNKLMIXG	FRONTIER NORTH, INC. - MI	CONKLIN
CNLKMIXG	FRONTIER NORTH, INC. - MI	CENTRAL LK
CNLNMIMN	AMERITECH MICHIGAN	CENTERLINE
CNSTMIXG	FRONTIER NORTH, INC. - MI	CONSTANTIN
CNVIMIXH	FRONTIER NORTH, INC. - MI	CENTREVL
COLNMIXG	FRONTIER NORTH, INC. - MI	COLON
CPACMIXH	FRONTIER NORTH, INC. - MI	CAPAC
CPMHMIXI	ACE TELEPHONE CO. OF MICHIGAN, INC.	COPESHTNVL
CPVLMIXG	FRONTIER NORTH, INC. - MI	COOPERSVL
CRCYMIXG	FRONTIER NORTH, INC. - MI	CARSONCITY
CRFLMIMN	AMERITECH MICHIGAN	CRYSTALFLS
CRNLMIMN	AMERITECH MICHIGAN	CORNELL
CRNNMIXK	FRONTIER NORTH, INC. - MI	OWOSSO
CRNYMIAB	UPPER PENINSULA TELEPHONE CO.	CARNEY
CRSWMIMN	AMERITECH MICHIGAN	CROSWELL
CRSWMIMN	AMERITECH MICHIGAN	PECK
CRTSMIMN	AMERITECH MICHIGAN	CURTIS
CRYSMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	CRYSTAL
CSCYMIXG	FRONTIER NORTH, INC. - MI	CASS CITY
CSNVMICB	AMERITECH MICHIGAN	CASNOVIA
CSNVMICB	AMERITECH MICHIGAN	KENT CITY
CSPLMIXG	FRONTIER NORTH, INC. - MI	CASSOPOLIS
CSVIMIMN	AMERITECH MICHIGAN	CARSONVL
CSVIMIMN	AMERITECH MICHIGAN	SNOVER
CSVLMIXH	FRONTIER NORTH, INC. - MI	CASEVILLE
CTPOMIXJ	UPPER PENINSULA TELEPHONE CO.	CHESTER
CVRTMIXG	FRONTIER NORTH, INC. - MI	COVERT
CYTNMIXI	COMMUNICATIONS CORP. OF MICHIGAN	CLAYTON
DBLNMIXI	KALEVA TELEPHONE COMPANY	DUBLIN
DCTRMIXG	FRONTIER NORTH, INC. - MI	DECATUR

CLLI	COMPANY NAME	RATE CENTER
DCVLMIXG	FRONTIER NORTH, INC. - MI	DECKERVL
DELTMIXI	BARRY COUNTY TELEPHONE CO.	DELTON
DETRMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	DE TOUR
DMDLMIDD	AMERITECH MICHIGAN	DIMONDALE
DMDLMIDD	AMERITECH MICHIGAN	LANSING
DNKNMIXI	UPPER PENINSULA TELEPHONE CO.	DONKEN
DNSVMIMN	AMERITECH MICHIGAN	DANSVILLE
DORRMIMN	AMERITECH MICHIGAN	DORR
DRBRMIDB	AMERITECH MICHIGAN	DETROITZN6
DRBRMIFB	AMERITECH MICHIGAN	DETROITZN6
DRBRMIOR	AMERITECH MICHIGAN	DETROITZN6
DRISMIXI	UPPER PENINSULA TELEPHONE CO.	DRUMMONDIS
DRNDMI09	LENNON TELEPHONE CO.	DURAND
DRNDMIXG	FRONTIER NORTH, INC. - MI	DURAND
DRNTMIXI	DRENTHE TELEPHONE CO.	DRENTHE
DRPKMIXI	HIAWATHA TELEPHONE CO.	DEER PARK
DRPLMIDP	AMERITECH MICHIGAN	DRAYTON PL
DRYDMIXG	FRONTIER NORTH, INC. - MI	DRYDEN
DTRTMIBH	AMERITECH MICHIGAN	DETROITZN1
DTRTMIBL	AMERITECH MICHIGAN	DETROITZN1
DTRTMICL	AMERITECH MICHIGAN	DETROITZN1
DTRTMILX	AMERITECH MICHIGAN	DETROITZN2
DTRTMIMD	AMERITECH MICHIGAN	DETROITZN1
DTRTMINI	AMERITECH MICHIGAN	DETROITZN2
DTRTMIPB	AMERITECH MICHIGAN	DETROITZN2
DTRTMIPG	AMERITECH MICHIGAN	DETROITZN2
DTRTMIRV	AMERITECH MICHIGAN	DETROITZN1
DTRTMITE	AMERITECH MICHIGAN	DETROITZN1
DTRTMIVW	AMERITECH MICHIGAN	DETROITZN6
DTTNMIMN	AMERITECH MICHIGAN	DUTTON
DTTNMIMN	AMERITECH MICHIGAN	GRAND RPDS
DUNDMIXG	FRONTIER NORTH, INC. - MI	DUNDEE
DVSNMIXG	FRONTIER NORTH, INC. - MI	DAVISON
DWGCMIXG	FRONTIER NORTH, INC. - MI	DOWAGIAC
DWTTMIXG	FRONTIER NORTH, INC. - MI	DE WITT
DXTRMIDX	AMERITECH MICHIGAN	DEXTER
ECKRMIXI	HIAWATHA TELEPHONE CO.	ECKERMAN
EDMRMIXG	FRONTIER NORTH, INC. - MI	EDMORE
EDWRMIXG	FRONTIER NORTH, INC. - MI	EDWARDSBG
EJRDIMIN	AMERITECH MICHIGAN	EASTJORDAN
EKTNMIXG	FRONTIER NORTH, INC. - MI	ELKTON
ELKRMIMN	AMERITECH MICHIGAN	ELK RAPIDS
ELNSMIMN	AMERITECH MICHIGAN	LANSING

CLLI	COMPANY NAME	RATE CENTER
ELSIMIXG	FRONTIER NORTH, INC. - MI	ELSIE
ELWOMIXH	FRONTIER NORTH, INC. - MI	ELLSWORTH
EMIRMIXJ	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	ELMIRA
EMMTMIXG	FRONTIER NORTH, INC. - MI	EMMETT
EMPRMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	GLEN LAKE
ENGDMIMN	AMERITECH MICHIGAN	ENGADINE
ERIEMIXG	FRONTIER NORTH, INC. - MI	ERIE
ESCNMIMN	AMERITECH MICHIGAN	ESCANABA
ESPTMIXG	FRONTIER NORTH, INC. - MI	EASTPORT
ETRPMIER	AMERITECH MICHIGAN	EATON RPD
ETWSMIMN	AMERITECH MICHIGAN	EAST TAWAS
EUCLMIEC	AMERITECH MICHIGAN	EAU CLAIRE
EVRTMIMN	AMERITECH MICHIGAN	EVART
EWENMIXI	ONTONAGON COUNTY TELEPHONE CO.	EWEN
FELDMIFL	AMERITECH MICHIGAN	FREELAND
FFLKMIMN	AMERITECH MICHIGAN	FIFE LAKE
FLCHMIXI	UPPER PENINSULA TELEPHONE CO.	FELCH
FLMOMIXI	CENTURY TEL CO NORTHERN MICHIGAN DBA CENTURYLINK	FALMOUTH
FLNTMIMN	AMERITECH MICHIGAN	FLINT
FLNTMINE	AMERITECH MICHIGAN	CLIMTMORRS
FLNTMINE	AMERITECH MICHIGAN	FLINT
FLNTMINR	AMERITECH MICHIGAN	FLINT
FLNTMINW	AMERITECH MICHIGAN	FLINT
FLRKMIFR	AMERITECH MICHIGAN	FLAT ROCK
FLSHMIFS	AMERITECH MICHIGAN	FLUSHING
FLTNMIMN	AMERITECH MICHIGAN	FULTON
FMHLMIFH	AMERITECH MICHIGAN	FARMINGTON
FMHLMIFH	AMERITECH MICHIGAN	W BLOOMFLD
FNRVMIXI	UPPER PENINSULA TELEPHONE CO.	FENCERIVER
FNTNMIMN	AMERITECH MICHIGAN	FENTON
FNVLMIXG	FRONTIER NORTH, INC. - MI	FENNVILLE
FNWKMIXG	FRONTIER NORTH, INC. - MI	FENWICK
FONTMIMN	AMERITECH MICHIGAN	FOUNTAIN
FONTMIMN	AMERITECH MICHIGAN	FREESOIL
FRFTMIMN	AMERITECH MICHIGAN	FRANKFORT
FRGRMIMN	AMERITECH MICHIGAN	AKRON
FRGRMIMN	AMERITECH MICHIGAN	FAIRGROVE
FRKMMIFR	AMERITECH MICHIGAN	FRANKENMTH
FRMTMIMN	AMERITECH MICHIGAN	FREMONT
FRNTMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	FRONTIER
FRPRMIXG	FRONTIER NORTH, INC. - MI	FRUITPORT
FRPTMIFP	AMERITECH MICHIGAN	FREEPORT
FRTNMIMN	AMERITECH MICHIGAN	FARMINGTON

CLLI	COMPANY NAME	RATE CENTER
FRVWMIXG	FRONTIER NORTH, INC. - MI	FAIRVIEW
FRWLMIMN	AMERITECH MICHIGAN	FARWELL
FRWLMIWS	AMERITECH MICHIGAN	FARWELL
FSTRMIXI	WOLVERINE TELEPHONE CO.	FOSTORIA
FTBGMIXI	FRONTIER MIDSTATES, INC. - MI	FITCHBURG
FTHRMIAA	UPPER PENINSULA TELEPHONE CO.	FAITHORN
FWLRMIXG	FRONTIER NORTH, INC. - MI	FOWLERPWMO
FWVLMIMN	AMERITECH MICHIGAN	FOWLRLV
GAINMIXG	FRONTIER NORTH, INC. - MI	GAINES
GBLSMIXG	FRONTIER NORTH, INC. - MI	GOBLES
GDJTMIXG	FRONTIER NORTH, INC. - MI	GRAND JCT
GDLKMIXI	MIDWAY TELEPHONE CO. - MI	GOLDENLAKE
GDLSMIXG	FRONTIER NORTH, INC. - MI	GOODELLS
GDMRMIXI	HIAWATHA TELEPHONE CO.	GRANDMRAIS
GDRCMIXJ	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	GOODRICH
GDRPMIBL	AMERITECH MICHIGAN	GRAND RPDS
GDRPMIEP	AMERITECH MICHIGAN	GRAND RPDS
GDRPMIES	AMERITECH MICHIGAN	GRAND RPDS
GDRPMISO	AMERITECH MICHIGAN	GRAND RPDS
GDRPMIWS	AMERITECH MICHIGAN	GRAND RPDS
GGTWMIRM	AMERITECH MICHIGAN	GAGETOWN
GLARMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	GLEN LAKE
GLBGMIMN	AMERITECH MICHIGAN	GALESBURG
GLDSMIGE	AMERITECH MICHIGAN	GLADSTONE
GLDWMIGL	AMERITECH MICHIGAN	GLADWIN
GLENMIMN	AMERITECH MICHIGAN	GALIEN
GLNEMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	GLENNIE
GLNNMIXI	FRONTIER MIDSTATES, INC. - MI	GLENN
GLVRMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	GULLIVER
GNGSMIXG	FRONTIER NORTH, INC. - MI	GANGES
GNVLMIMN	AMERITECH MICHIGAN	GREENVILLE
GRBLMIMN	AMERITECH MICHIGAN	GRANDBLANC
GRDNMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	GARDEN
GRGRMIXI	FRONTIER MIDSTATES, INC. - MI	GREGORY
GRHRMIXI	UPPER PENINSULA TELEPHONE CO.	GRACE HBR
GRHVMIMN	AMERITECH MICHIGAN	GRANDHAVEN
GRLDMIXG	FRONTIER NORTH, INC. - MI	GRANDLEDGE
GRLKMIXG	FRONTIER NORTH, INC. - MI	GRASS LAKE
GRNTMIMN	AMERITECH MICHIGAN	GRANT
GRTNMIMN	AMERITECH MICHIGAN	GRATTAN
GRWNMIMN	AMERITECH MICHIGAN	INTERLOCHN
GRWNMIMN	AMERITECH MICHIGAN	TRAVERSECY
GRYLMIXG	FRONTIER NORTH, INC. - MI	GRAYLING

CLLI	COMPANY NAME	RATE CENTER
GWNNMIMN	AMERITECH MICHIGAN	GWINN
GYLRMIXG	FRONTIER NORTH, INC. - MI	GAYLORD
HALEMIXA	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	HALE
HARTMIXG	FRONTIER NORTH, INC. - MI	HART
HBLKMIXG	FRONTIER NORTH, INC. - MI	HUBBARD LK
HBTNMIXG	FRONTIER NORTH, INC. - MI	HUBBARDSTN
HDLYMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	HADLEY
HDSNMIXH	FRONTIER NORTH, INC. - MI	HUDSON
HDVLMIMN	AMERITECH MICHIGAN	GRAND RPDS
HDVLMIMN	AMERITECH MICHIGAN	HUDSONVL
HGLKMIXG	FRONTIER NORTH, INC. - MI	HIGGINS LK
HGPTMIXL	FRONTIER NORTH, INC. - MI	HOUGHTONLK
HHLKMIXG	FRONTIER NORTH, INC. - MI	HOUGHTONLK
HKCRMIXI	COMMUNICATIONS CORP. OF MICHIGAN	HICKORYCOR
HLBRMIXI	HIAWATHA TELEPHONE CO.	HULBERT
HLDLMIMN	AMERITECH MICHIGAN	HILLSDALE
HLLDMIMN	AMERITECH MICHIGAN	HOLLAND
HLLDMINR	AMERITECH MICHIGAN	HOLLAND
HLLYMIHY	AMERITECH MICHIGAN	HOLLY
HLMNMIXG	FRONTIER NORTH, INC. - MI	HILLMAN
HLTNMIXG	FRONTIER NORTH, INC. - MI	HOLTON
HMBGMIMN	AMERITECH MICHIGAN	BRIGHTON
HMLCMIXG	FRONTIER NORTH, INC. - MI	HEMLOCK
HMTNMIXG	FRONTIER NORTH, INC. - MI	HAMILTON
HNCCMIMN	AMERITECH MICHIGAN	HOUGHTON
HNORMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	HONOR
HNVRMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	HANOVER
HOLTMIHE	AMERITECH MICHIGAN	HOLT
HOMRMIXJ	FRONTIER MIDSTATES, INC. - MI	HOMER
HOPEMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	HOPE
HOWLMIMN	AMERITECH MICHIGAN	HOWELL
HPKNMIAJ	AMERITECH MICHIGAN	HOPKINS
HRBHMIXG	FRONTIER NORTH, INC. - MI	HARBOR BCH
HRFRMIXG	FRONTIER NORTH, INC. - MI	HARTFORD
HRISMIMN	AMERITECH MICHIGAN	ALGONAC
HRLDMIHR	AMERITECH MICHIGAN	HARTLAND
HRSNMIMN	AMERITECH MICHIGAN	HARRISON
HRSPMIMN	AMERITECH MICHIGAN	HARBOR SPG
HRTAMIMN	AMERITECH MICHIGAN	HARRIETTA
HRVLMIXG	FRONTIER NORTH, INC. - MI	HARRISVL
HRVYMIMN	AMERITECH MICHIGAN	MARQUETTE
HSLTMIHS	AMERITECH MICHIGAN	LANSING
HSNGMIHS	AMERITECH MICHIGAN	HASTINGS

CLLI	COMPANY NAME	RATE CENTER
HSPRMIXH	FRONTIER NORTH, INC. - MI	HESPERIA
HWCYMIXG	FRONTIER NORTH, INC. - MI	HOWARDCITY
HXVLMIXI	ACE TELEPHONE CO. OF MICHIGAN, INC.	HOXEYVILLE
IDA MIXH	FRONTIER NORTH, INC. - MI	IDA
IMCYMIXH	FRONTIER NORTH, INC. - MI	IMLAY CITY
INRVMIMN	AMERITECH MICHIGAN	INDIAN RIV
IONIMIMN	AMERITECH MICHIGAN	IONIA
IRMTMIMN	AMERITECH MICHIGAN	IRON MT
IRONMIIR	AMERITECH MICHIGAN	IRONS
IRRVIMIMN	AMERITECH MICHIGAN	IRON RIVER
IRWDMIMN	AMERITECH MICHIGAN	IRONWOOD
ISHPMIMN	AMERITECH MICHIGAN	ISHPEMING
ITHCMIXG	FRONTIER NORTH, INC. - MI	ITHACA
JCSNMIMN	AMERITECH MICHIGAN	JACKSON
JCSNMINE	AMERITECH MICHIGAN	JACKSON
JCSNMISA	AMERITECH MICHIGAN	JACKSON
JDDOMIXG	FRONTIER NORTH, INC. - MI	JEDDO
JMTWMIMN	AMERITECH MICHIGAN	JAMESTOWN
JNVLMIMN	AMERITECH MICHIGAN	JONESVILLE
KGSLMIXI	CENTURY TEL CO NORTHERN MICHIGAN DBA CENTURYLINK	KINGSLEY
KGTNMIXG	FRONTIER NORTH, INC. - MI	KINGSTON
KLKSMIKK	AMERITECH MICHIGAN	KALKASKA
KLMZMIFA	AMERITECH MICHIGAN	KALAMAZOO
KLVAMIXI	KALEVA TELEPHONE COMPANY	KALEVA
KNDEMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	KINDE
KNRSMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	KINROSS
KWNWMIMN	AMERITECH MICHIGAN	KEWEENAW
LACYMIXI	BARRY COUNTY TELEPHONE CO.	LACEY
LCHNMIXG	FRONTIER NORTH, INC. - MI	LACHINE
LCTAMIXI	FRONTIER MIDSTATES, INC. - MI	LACOTA
LDNGMIXG	FRONTIER NORTH, INC. - MI	LUDINGTON
LESLMIMN	AMERITECH MICHIGAN	LESLIE
LIVNMIMN	AMERITECH MICHIGAN	LIVONIA
LIVNMIMN	AMERITECH MICHIGAN	WAYNE
LIVNMINW	AMERITECH MICHIGAN	LIVONIA
LIVNMINW	AMERITECH MICHIGAN	PLYMOUTH
LKANMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	LAKE ANN
LKCYMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	LAKE CITY
LKGOMIXI	UPPER PENINSULA TELEPHONE CO.	LK GOGEBIC
LKLIMIMN	AMERITECH MICHIGAN	LAKELINDEN
LKLLMIMN	AMERITECH MICHIGAN	LKLEELANAU
LKNRMIXJ	PIGEON TELEPHONE CO.	ALBA
LKODMIMN	AMERITECH MICHIGAN	LAKEODESSA

CLLI	COMPANY NAME	RATE CENTER
LKORMILO	AMERITECH MICHIGAN	LAKE ORION
LKVWMIXG	FRONTIER NORTH, INC. - MI	LAKEVIEW
LLALMIXG	FRONTIER NORTH, INC. - MI	LONG LAKE
LMVLMIXI	FRONTIER MIDSTATES, INC. - MI	LAMBERTVL
LNBMIXG	FRONTIER NORTH, INC. - MI	LAINGSBURG
LNCLMIXG	FRONTIER NORTH, INC. - MI	LINCOLN
LNDNMIXG	FRONTIER NORTH, INC. - MI	LINDEN
LNNGMIMN	AMERITECH MICHIGAN	LANSING
LNNGMINW	AMERITECH MICHIGAN	LANSING
LNNGMISO	AMERITECH MICHIGAN	LANSING
LNONMIXI	LENNON TELEPHONE CO.	LENNON
LNPKMIAT	AMERITECH MICHIGAN	DETROITZN6
LNSEMIXI	BARAGA TELEPHONE CO.	L ANSE
LNWDMIMN	AMERITECH MICHIGAN	LINWOOD
LPERMILP	AMERITECH MICHIGAN	LAPEER
LPTNMIXJ	FRONTIER MIDSTATES, INC. - MI	LUPTON
LROYMIMN	AMERITECH MICHIGAN	LE ROY
LSTNMIXG	FRONTIER NORTH, INC. - MI	LEWISTON
LTFDMIXJ	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	LITCHFIELD
LTHRMIMN	AMERITECH MICHIGAN	LUTHER
LVRGMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	LEVERING
LWLLMIMN	AMERITECH MICHIGAN	LOWELL
LWRNMIXI	FRONTIER MIDSTATES, INC. - MI	LAWRENCE
LWTNMIXG	FRONTIER NORTH, INC. - MI	LAWTON
LXTNMIMN	AMERITECH MICHIGAN	LEXINGTON
MARNMIMN	AMERITECH MICHIGAN	MARION
MARTMIMT	AMERITECH MICHIGAN	MARTIN
MASNMIMS	AMERITECH MICHIGAN	MASON
MASSMIXI	ONTONAGON COUNTY TELEPHONE CO.	MASS
MCBNMIMN	AMERITECH MICHIGAN	MCBAIN
MCBRMIXG	FRONTIER NORTH, INC. - MI	MCBRIDES
MCCYMIMN	AMERITECH MICHIGAN	MACKINAWCY
MCHCMIMN	AMERITECH MICHIGAN	JACKSON
MCHGMIMN	AMERITECH MICHIGAN	MICHIGAMME
MCISMIMN	AMERITECH MICHIGAN	MACKINACIS
MCPKMIMN	AMERITECH MICHIGAN	HOLLAND
MCSTMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	MECOSTA
MDLDMIMN	AMERITECH MICHIGAN	MIDLAND
MDLDMISE	AMERITECH MICHIGAN	MIDLAND
MDTNMIXG	FRONTIER NORTH, INC. - MI	MIDDLETON
MDVLMIMN	AMERITECH MICHIGAN	MIDDLEVL
MGTNMIXI	WOLVERINE TELEPHONE CO.	MILLINGTON
MILNMIMN	AMERITECH MICHIGAN	MILAN

CLLI	COMPANY NAME	RATE CENTER
MIO MIXG	FRONTIER NORTH, INC. - MI	MIO
MLFRMIXE	FRONTIER NORTH, INC. - MI	MILFDWH LK
MLKNMIMN	AMERITECH MICHIGAN	MULLIKEN
MMPHMIXG	FRONTIER NORTH, INC. - MI	MEMPHIS
MNCHMIMN	AMERITECH MICHIGAN	MANCHESTER
MNCLMIMN	AMERITECH MICHIGAN	MANCELONA
MNCYMIXG	FRONTIER NORTH, INC. - MI	MINDENCITY
MNDNMIXG	FRONTIER NORTH, INC. - MI	MENDON
MNGRMIXJ	WOLVERINE TELEPHONE CO.	MUNGER
MNMNMINB	AMERITECH MICHIGAN	MENOMINEE
MNPLMIXG	FRONTIER NORTH, INC. - MI	MTPLEASANT
MNSGMIXJ	HIAWATHA TELEPHONE CO.	MUNISING
MNSTMIMN	AMERITECH MICHIGAN	MANISTEE
MNTHMIXI	FRONTIER MIDSTATES, INC. - MI	MUNITH
MNTNMIMN	AMERITECH MICHIGAN	MANTON
MNTQMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	MANISTIQUE
MOLNMIMN	AMERITECH MICHIGAN	MOLINE
MONRMIMN	AMERITECH MICHIGAN	MONROE
MONRMINE	AMERITECH MICHIGAN	MONROE
MPRPMIXG	FRONTIER NORTH, INC. - MI	MAPLE RPD
MRCLMIXG	FRONTIER NORTH, INC. - MI	MARCELLUS
MRCYMIMN	AMERITECH MICHIGAN	MARINECITY
MRLTMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	MARLETTE
MRLYMIMN	AMERITECH MICHIGAN	MORLEY
MRNCMIXI	FRONTIER MIDSTATES, INC. - MI	MORENCI
MRNEMIMN	AMERITECH MICHIGAN	MARNE
MRNSMIXI	UPPER PENINSULA TELEPHONE CO.	MARENISCO
MRQTMIMN	AMERITECH MICHIGAN	BIG BAY
MRQTMIMN	AMERITECH MICHIGAN	MARQUETTE
MRRLMIXG	FRONTIER NORTH, INC. - MI	MERRILL
MRRTMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	MERRITT
MRSHMIMN	AMERITECH MICHIGAN	MARSHALL
MSCKMIXI	ACE TELEPHONE CO. OF MICHIGAN, INC.	MESICK
MSHVMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	MOSHERVL
MSKGMIXK	FRONTIER NORTH, INC. - MI	MUSKEGON
MSKGMIXL	FRONTIER NORTH, INC. - MI	MUSKEGON
MSKGMIXM	FRONTIER NORTH, INC. - MI	MUSKEGON
MSKGMIXN	FRONTIER NORTH, INC. - MI	MUSKEGON
MSKGMIXQ	FRONTIER NORTH, INC. - MI	MUSKEGON
MSKGMIXR	FRONTIER NORTH, INC. - MI	MUSKEGON
MSKHMIXP	FRONTIER NORTH, INC. - MI	MUSKEGON
MSTWMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	MOORESTOWN
MTCLMIXL	AMERITECH MICHIGAN	MT CLEMENS

CLLI	COMPANY NAME	RATE CENTER
MTCLMICL	AMERITECH MICHIGAN	UTICA
MTCLMIMN	AMERITECH MICHIGAN	MT CLEMENS
MTCLMINR	AMERITECH MICHIGAN	MT CLEMENS
MTCTMIAC	ALLBAND COMMUNICATIONS COOPERATIVE	ROBBS CRK
MTGMMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	MONTGOMERY
MTMOMIXG	FRONTIER NORTH, INC. - MI	METAMORA
MTRSMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	MONTROSE
MTWNMIXG	FRONTIER NORTH, INC. - MI	MATTAWAN
MUIRMIXG	FRONTIER NORTH, INC. - MI	MUIR
MYBEMIXH	FRONTIER NORTH, INC. - MI	MAYBEE
MYVIMIMN	AMERITECH MICHIGAN	PORT HURON
MYVLMIMN	AMERITECH MICHIGAN	MAYVILLE
NADMMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	NORTHADAMS
NBMRMIMN	AMERITECH MICHIGAN	NEWBALTIMR
NBRNMIXG	FRONTIER NORTH, INC. - MI	NORTH BRCH
NBTNMIMN	AMERITECH MICHIGAN	NEW BOSTON
NGNEMIMN	AMERITECH MICHIGAN	NEGAUNEE
NILSMIMN	AMERITECH MICHIGAN	NILES
NLTHMIXJ	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	NEWLOTHROP
NPLNMIMN	AMERITECH MICHIGAN	NAPOLEON
NPRTMIMN	AMERITECH MICHIGAN	NORTHPORT
NRSHMIXG	FRONTIER NORTH, INC. - MI	MUSKEGON
NRVLMIMN	AMERITECH MICHIGAN	NORTHVILLE
NRWYMINW	AMERITECH MICHIGAN	NORWAY
NVVLIMIMN	AMERITECH MICHIGAN	NASHVILLE
NVVLIMIMN	AMERITECH MICHIGAN	VERMONTVL
NWAYMINW	AMERITECH MICHIGAN	NEWAYGO
NWBFMIMN	AMERITECH MICHIGAN	NEWBUFFALO
NWBYMIMN	AMERITECH MICHIGAN	NEWBERRY
NWHNMIMN	AMERITECH MICHIGAN	NEW HAVEN
NWPTMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	NEWPORT
OGDCMIXI	OGDEN TELEPHONE CO. MI	OGDEN CTR
OKMSMIMN	AMERITECH MICHIGAN	LANSING
OLMSMIXI	PENINSULA TELEPHONE CO.	OLDMISSION
OLVTMIMN	AMERITECH MICHIGAN	OLIVET
OMERMIXJ	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	OMER
ONDGMIXI	FRONTIER MIDSTATES, INC. - MI	ONONDAGA
ONKMMIMN	AMERITECH MICHIGAN	ONEKAMA
ONSTMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	ONSTED
ONTNMIXI	ONTONAGON COUNTY TELEPHONE CO.	ONTONAGON
ONWYMIXG	FRONTIER NORTH, INC. - MI	ONAWAY
ORLNMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	ORLEANS
ORVLMIXG	FRONTIER NORTH, INC. - MI	ORTONVILLE

CLLI	COMPANY NAME	RATE CENTER
OSCDMIMN	AMERITECH MICHIGAN	OSCODA
OSHTMIWS	AMERITECH MICHIGAN	KALAMAZOO
OSNKMIXG	FRONTIER NORTH, INC. - MI	OSSINEKE
OSSEMIXI	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	OSSEO
OTSGMIOS	AMERITECH MICHIGAN	OTSEGO
OTVLMIXG	FRONTIER NORTH, INC. - MI	OTISVILLE
OVIDMIXG	FRONTIER NORTH, INC. - MI	OVID
OWNDMIMN	AMERITECH MICHIGAN	OWENDALE
OWSOMIXH	FRONTIER NORTH, INC. - MI	OWOSSO
OXFRMIOX	AMERITECH MICHIGAN	OXFORD
PALOMIXG	FRONTIER NORTH, INC. - MI	PALO
PARMMIXJ	FRONTIER MIDSTATES, INC. - MI	PARMA
PDVLMIXM	FRONTIER NORTH, INC. - MI	HOUGHTONLK
PGENMIXJ	PIGEON TELEPHONE CO.	PIGEON
PINCMIXJ	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	PINCONNING
PKFDMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	PICKFORD
PLMNMIXI	FRONTIER MIDSTATES, INC. - MI	PULLMAN
PLMOMIMN	AMERITECH MICHIGAN	PLYMOUTH
PLNWMIMN	AMERITECH MICHIGAN	PLAINWELL
PLSTMIMN	AMERITECH MICHIGAN	PELLSTON
PNCNMIMN	AMERITECH MICHIGAN	PINCKNEY
PNLKMIXI	BARRY COUNTY TELEPHONE CO.	PINE LAKE
PNTCMIMN	AMERITECH MICHIGAN	PONTIAC
PNTCMINE	AMERITECH MICHIGAN	PONTIAC
PNTCMINE	AMERITECH MICHIGAN	ROCHESTER
PNTCMINR	AMERITECH MICHIGAN	CLARKSTON
PNTCMINR	AMERITECH MICHIGAN	PONTIAC
PNTCMIWS	AMERITECH MICHIGAN	PONTIAC
PNTWMIXG	FRONTIER NORTH, INC. - MI	PENTWATER
POMPMIXG	FRONTIER NORTH, INC. - MI	POMPEII
POSNMIXG	FRONTIER NORTH, INC. - MI	POSEN
POVLMIMN	AMERITECH MICHIGAN	POTTERVL
PRDSMIXI	HIAWATHA TELEPHONE CO.	PARADISE
PRRYMIXI	SHIAWASSEE TELEPHONE CO.	PERRY
PRSCMIXP	FRONTIER MIDSTATES, INC. - MI	PRESCOTT
PRTGMILK	AMERITECH MICHIGAN	KALAMAZOO
PRVLMIXJ	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	PRATTVILLE
PTASMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	PORTAUSTIN
PTBGMIAK	DEERFIELD FARMERS TELEPHONE CO.	DEERFIELD
PTBGMIAK	DEERFIELD FARMERS TELEPHONE CO.	PETERSBURG
PTHPMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	PORT HOPE
PTHRMIMN	AMERITECH MICHIGAN	PORT HURON
PTHRMINR	AMERITECH MICHIGAN	PORT HURON

CLLI	COMPANY NAME	RATE CENTER
PTLDMIPT	AMERITECH MICHIGAN	PORTLAND
PTSKMIMN	AMERITECH MICHIGAN	PETOSKEY
PTSNMIMN	AMERITECH MICHIGAN	PT SANILAC
PWPWMIXG	FRONTIER NORTH, INC. - MI	PAW PAW
PWRSMIMN	AMERITECH MICHIGAN	HERMANSVL
PWRSMIMN	AMERITECH MICHIGAN	POWERS
QNCYMIXG	FRONTIER NORTH, INC. - MI	QUINCY
RCFRMIMN	AMERITECH MICHIGAN	ROCKFORD
RCFRMISE	AMERITECH MICHIGAN	ROCKFORD
RCLDMIMN	AMERITECH MICHIGAN	RICHLAND
RCMDMIXG	FRONTIER NORTH, INC. - MI	RICHMOND
RDCYMIMN	AMERITECH MICHIGAN	REED CITY
RDNGMIXG	FRONTIER NORTH, INC. - MI	READING
RDYRMIXG	CENTURYTEL OF UPPER MICHIGAN INC DBA CENTURYLINK	RUDYARD
REESMIMN	AMERITECH MICHIGAN	REESE
RGCYMIXG	FRONTIER NORTH, INC. - MI	ROGERS CITY
RKLDMIXI	ONTONAGON COUNTY TELEPHONE CO.	ROCKLAND
RKWDMIRW	AMERITECH MICHIGAN	ROCKWOOD
RMLSMIMN	AMERITECH MICHIGAN	ROMULUS
RMUSMIXG	FRONTIER NORTH, INC. - MI	REMUS
RNKNMIXG	FRONTIER NORTH, INC. - MI	RANKIN
RNSMMIXJ	FRONTIER COMMUNICATIONS OF MICHIGAN, INC.	RANSOM
ROCHMIMN	AMERITECH MICHIGAN	ROCHESTER
ROCKMIMN	AMERITECH MICHIGAN	PERKINS
ROCKMIMN	AMERITECH MICHIGAN	ROCK
ROMOMIMN	AMERITECH MICHIGAN	ROMEO
RPBLMIMN	AMERITECH MICHIGAN	REPUBLIC
RPRVMIMN	AMERITECH MICHIGAN	RAPIDRIVER
RSBHMIMN	AMERITECH MICHIGAN	ROSEBUSH
RSCMMIXG	FRONTIER NORTH, INC. - MI	ROSCOMMON
RSCYMIXJ	FRONTIER MIDSTATES, INC. - MI	ROSE CITY
RSVLMIMN	AMERITECH MICHIGAN	ROSEVILLE
RSVLMINR	AMERITECH MICHIGAN	MT CLEMENS
RSVLMINR	AMERITECH MICHIGAN	ROSEVILLE
RVDLMIXG	FRONTIER NORTH, INC. - MI	RIVERDALE
RVJTMIXI	FRONTIER MIDSTATES, INC. - MI	RIVES JCT
RVNNMIXG	FRONTIER NORTH, INC. - MI	RAVENNA
RVSDMIRV	AMERITECH MICHIGAN	BENTON HBR
RXTNMIAA	UPPER PENINSULA TELEPHONE CO.	REXTON
RYLOMIMN	AMERITECH MICHIGAN	ROYAL OAK
SALNMIXG	FRONTIER NORTH, INC. - MI	SALINE
SBRDMIXI	ACE TELEPHONE CO. OF MICHIGAN, INC.	SOBOARDMAN
SBWNMISB	AMERITECH MICHIGAN	SEBEWAING

CLLI	COMPANY NAME	RATE CENTER
SCHLMIXG	FRONTIER NORTH, INC. - MI	SCHOOLCFT
SCTSMIMN	AMERITECH MICHIGAN	SCOTTS
SCVLMIMN	AMERITECH MICHIGAN	SCOTTVILLE
SDLKMIMN	AMERITECH MICHIGAN	SAND LAKE
SDNYMIXG	FRONTIER NORTH, INC. - MI	SIDNEY
SENYMIXI	HIAWATHA TELEPHONE CO.	SENEY
SFLDMIMN	AMERITECH MICHIGAN	SOUTHFIELD
SFLDMIOK	AMERITECH MICHIGAN	ROYAL OAK
SFLDMIOK	AMERITECH MICHIGAN	SOUTHFIELD
SGNWMIFA	AMERITECH MICHIGAN	SAGINAW
SGNWMISH	AMERITECH MICHIGAN	SAGINAW
SGNWMIWS	AMERITECH MICHIGAN	SAGINAW
SGTCMIXG	FRONTIER NORTH, INC. - MI	SAUGATUCK
SHBGMIXI	SHIAWASSEE TELEPHONE CO.	SHAFTSBURG
SHLBMIXG	FRONTIER NORTH, INC. - MI	SHELBY
SHNGMIXI	HIAWATHA TELEPHONE CO.	SHINGLETON
SHPHMIXG	FRONTIER NORTH, INC. - MI	SHEPHERD
SHRDMIXG	FRONTIER NORTH, INC. - MI	SHERIDAN
SKNDMIXI	CHATHAM TELEPHONE CO.	SKANDIA
SLYNMIMN	AMERITECH MICHIGAN	SOUTH LYON
SMCKMIXG	FRONTIER NORTH, INC. - MI	SMITHS CRK
SNCKMIXI	SAND CREEK TELEPHONE CO.	SAND CREEK
SNDSMIMN	AMERITECH MICHIGAN	APPLEGATE
SNDSMIMN	AMERITECH MICHIGAN	SANDUSKY
SNFDMIXI	CENTURYTEL MIDWEST-MIDWEST INC DBA CENTURYLINK	SUNFIELD
SNFRMIXI	WOLVERINE TELEPHONE CO.	SANFORD
SNRVMIXI	CHATHAM TELEPHONE CO.	SAND RIVER
SNTNMIXG	FRONTIER NORTH, INC. - MI	STANTON
SOHNMIXH	FRONTIER NORTH, INC. - MI	SOUTHHAVEN
SPPTMIXI	SPRINGPORT TELEPHONE CO.	SPRINGPORT
SPRTMIMN	AMERITECH MICHIGAN	SPARTA
SRLKMIXG	FRONTIER NORTH, INC. - MI	SISTER LKS
SRNCMIDC	AMERITECH MICHIGAN	SARANAC
SSMRMIMN	AMERITECH MICHIGAN	SALTSTMARI
SSMRMIMN	AMERITECH MICHIGAN	TROUT LAKE
STBRMIXI	FRONTIER MIDSTATES, INC. - MI	STOCKBDG
STBYMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	SUTTONSBAY
STCHMIMN	AMERITECH MICHIGAN	ST CHARLES
STCLMIMN	AMERITECH MICHIGAN	ST CLAIR
STHLMIMN	AMERITECH MICHIGAN	ST HELEN
STIGMIMN	AMERITECH MICHIGAN	BREVORT
STIGMIMN	AMERITECH MICHIGAN	ST IGNACE
STJHMIXG	FRONTIER NORTH, INC. - MI	ST JOHNS

CLLI	COMPANY NAME	RATE CENTER
STJMMIXI	ISLAND TELEPHONE CO.	ST JAMES
STJSMISO	AMERITECH MICHIGAN	ST JOSEPH
STLSMIXG	FRONTIER NORTH, INC. - MI	ST LOUIS
STNDMIMN	AMERITECH MICHIGAN	STANDISH
STNGMIXJ	FRONTIER MIDSTATES, INC. - MI	STERLING
STRGMIXG	FRONTIER NORTH, INC. - MI	STURGIS
STSNMIST	AMERITECH MICHIGAN	STEPHENSON
STWDMIXG	FRONTIER NORTH, INC. - MI	STANWOOD
SWCRMIXG	FRONTIER NORTH, INC. - MI	SWARTZ CRK
SWYRMIXI	FRONTIER MIDSTATES, INC. - MI	SAWYER
SXLKMIXG	FRONTIER NORTH, INC. - MI	SIX LAKES
SXLSMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	SIXTYLAKES
TAYLMIWK	AMERITECH MICHIGAN	DETROITZN6
TAYLMIWK	AMERITECH MICHIGAN	ROMULUS
TAYLMIWK	AMERITECH MICHIGAN	WYANDOTTE
TCMSMIXG	FRONTIER NORTH, INC. - MI	TECUMSEH
THOKMIMN	AMERITECH MICHIGAN	THREE OAKS
THRRMIXH	FRONTIER NORTH, INC. - MI	THREERIVRS
THRRMIXT	FRONTIER NORTH, INC. - MI	THREERIVRS
TKNSMIXI	FRONTIER MIDSTATES, INC. - MI	TEKONSHA
TMPRMIXG	FRONTIER NORTH, INC. - MI	TEMPERANCE
TNLKMIXG	FRONTIER NORTH, INC. - MI	TWIN LAKE
TPLAMIXI	BARAGA TELEPHONE CO.	TAPIOLA
TPTNMIXG	FRONTIER NORTH, INC. - MI	TIPTON
TRCKMIXJ	MIDWAY TELEPHONE CO. - MI	TROUTCREEK
TRCYMIMN	AMERITECH MICHIGAN	TRAVERSECY
TRENMIMN	AMERITECH MICHIGAN	TRENTON
TRENMIMN	AMERITECH MICHIGAN	WYANDOTTE
TRFNMIMN	AMERITECH MICHIGAN	CORAL
TRFNMIMN	AMERITECH MICHIGAN	TRUFANT
TRNYMIXI	CHATHAM TELEPHONE CO.	TRENARY
TROYMIMN	AMERITECH MICHIGAN	ROYAL OAK
TROYMIMN	AMERITECH MICHIGAN	TROY
TROYMISM	AMERITECH MICHIGAN	BIRMINGHAM
TROYMISM	AMERITECH MICHIGAN	ROYAL OAK
TROYMISM	AMERITECH MICHIGAN	TROY
TUSTMIMN	AMERITECH MICHIGAN	TUSTIN
TWNGMI01	PIGEON TELEPHONE CO.	TWINING
UBLYMIUB	AMERITECH MICHIGAN	UBLY
UNCYMIXG	FRONTIER NORTH, INC. - MI	UNION CITY
UNINMIXG	FRONTIER NORTH, INC. - MI	UNION
UNVLMIMN	AMERITECH MICHIGAN	UNIONVILLE
UTICMIMN	AMERITECH MICHIGAN	UTICA

CLLI	COMPANY NAME	RATE CENTER
VANDMIXG	FRONTIER NORTH, INC. - MI	VANDALIA
VCBGMIMN	AMERITECH MICHIGAN	VICKSBURG
VNDRMIXG	FRONTIER NORTH, INC. - MI	VANDERBILT
VSSRMIMN	AMERITECH MICHIGAN	VASSAR
VTBGMIXG	FRONTIER NORTH, INC. - MI	VESTABURG
WASHMIWA	AMERITECH MICHIGAN	WASHINGTON
WAYNMIMN	AMERITECH MICHIGAN	WAYNE
WAYNMINW	AMERITECH MICHIGAN	PLYMOUTH
WAYNMINW	AMERITECH MICHIGAN	WAYNE
WAYNMINW	AMERITECH MICHIGAN	YPSILANTI
WBFDMIMN	AMERITECH MICHIGAN	W BLOOMFLD
WBRNMIMN	AMERITECH MICHIGAN	WESTBRANCH
WBVLMIXJ	FRONTIER MIDSTATES, INC. - MI	WEBBERVL
WCSTMIXG	FRONTIER NORTH, INC. - MI	GRANDLEDGE
WDLDMIXG	FRONTIER NORTH, INC. - MI	WOODLAND
WDLKMIMN	AMERITECH MICHIGAN	WALLEDLAKE
WDMNMIXG	FRONTIER NORTH, INC. - MI	WEIDMAN
WDRNMIXJ	WALDRON TELEPHONE CO.	WALDRON
WHCLMIAD	AMERITECH MICHIGAN	WHITECLOUD
WHLKMIXG	FRONTIER NORTH, INC. - MI	MILFDWH LK
WHMRMIXI	CENTURYTEL OF MICHIGAN INC DBA CENTURYLINK	WHITTEMORE
WHPGMIXG	FRONTIER NORTH, INC. - MI	WH PIGEON
WHPIMIXI	ONTONAGON COUNTY TELEPHONE CO.	WHITE PINE
WHTHMIXG	FRONTIER NORTH, INC. - MI	WHITEHALL
WILSMIWL	AMERITECH MICHIGAN	WILLIS
WINNMIXI	WINN TELEPHONE CO.	WINN
WKFDMIMN	AMERITECH MICHIGAN	WAKEFIELD
WLBGMIWB	AMERITECH MICHIGAN	WILLIAMSBG
WLKMMIXG	FRONTIER NORTH, INC. - MI	MUSKEGON
WLLCMIXA	UPPER PENINSULA TELEPHONE CO.	WALLACE
WLTMIXI	KALEVA TELEPHONE COMPANY	WELLSTON
WLVRMIMN	AMERITECH MICHIGAN	WOLVERINE
WMTNMIXG	FRONTIER NORTH, INC. - MI	WILLIAMSTN
WNLKMIWL	AMERITECH MICHIGAN	WALLOON LK
WPHLMIXI	WESTPHALIA TELEPHONE CO.	WESTPHALIA
WRLKMIMN	AMERITECH MICHIGAN	WHITMORELK
WRRNMIMN	AMERITECH MICHIGAN	WARREN
WRRNMITL	AMERITECH MICHIGAN	CENTERLINE
WTMQMIXI	UPPER PENINSULA TELEPHONE CO.	WATSON
WTRMMIMN	AMERITECH MICHIGAN	WATERSMEET
WTRVMIWV	AMERITECH MICHIGAN	COLOMA
WTRVMIWV	AMERITECH MICHIGAN	WATERVLIET
WTTNMIXJ	MIDWAY TELEPHONE CO. - MI	WATTON

CLLI	COMPANY NAME	RATE CENTER
WYLDMIMN	AMERITECH MICHIGAN	WAYLAND
WYNDMIMN	AMERITECH MICHIGAN	WYANDOTTE
WYNGMILX	AMERITECH MICHIGAN	GRAND RPDS
YALEMIXG	FRONTIER NORTH, INC. - MI	YALE
YPSLMIMN	AMERITECH MICHIGAN	YPSILANTI
ZELDMIZL	AMERITECH MICHIGAN	ZEELAND

EXHIBIT 3

FCC-Approved Compliance Plan



PUBLIC NOTICE

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

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

DA 18-854

Released: August 15, 2018

WIRELINE COMPETITION BUREAU APPROVES THE WIRELINE AND WIRELESS COMPLIANCE PLAN OF GLOBAL CONNECTION

WC Docket Nos. 09-197, 11-42

The Wireline Competition Bureau (Bureau) hereby approves the joint wireline and wireless compliance plan¹ of Global Connection, Inc. of America, (Global Connection) filed pursuant to the requirements for the continued provision of Lifeline service.²

The Act provides that a carrier be designated as an eligible telecommunications carrier (ETC) to receive universal service support.³ The Commission has required that all telecommunications carriers seeking Lifeline-only ETC designation must meet the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement its obligations.⁴

The Bureau has clarified that any transfer of ownership or control of an ETC with an approved Lifeline compliance plan requires Commission approval in advance of the transaction.⁵ This includes renewing compliance plan approval for changes in the corporate ownership and control of the ETC.⁶

In accordance with this requirement, Global Connection submitted an amended compliance plan for both its wireline and wireless Lifeline services for Bureau approval.⁷ Global Connection has previously-approved wireline and wireless compliance plans⁸ and currently provides resold wireline

¹ See Global Connection Inc. of America Revised Wireline and Wireless Compliance Plan, WC Docket No. 09-197, 11-42 (filed Apr. 16, 2018) (*Global Connection Compliance Plan*).

² See *Lifeline and Link Up Reform and Modernization et al*, 27 FCC Rcd 6656, 6816, paras. 379-380 (2012) (*2012 Lifeline Reform Order*); *In the Matter of Lifeline & Link Up Reform & Modernization*, 30 FCC Rcd 7818 (2015) (*2015 Lifeline Order*).

³ 47 U.S.C. § 214(e)(1)(A).

⁴ See *2012 Lifeline Reform Order*, 27 FCC Rcd at 6814, 6819, paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *2012 Lifeline Reform Order*. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, 27 FCC Rcd 2186 (WCB 2012).

⁵ *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Universal Service Support*, Public Notice, 29 FCC Rcd 9144, 9145 (WCB 2014) (*2014 ETC Public Notice*).

⁶ *Id.*

⁷ See *Global Connection Compliance Plan*.

⁸ See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom, and Total Call*, Public Notice, 27 FCC Rcd 5776 (WCB 2012); *Wireline Competition Bureau Approves the Wireline Compliance Plans of*

Lifeline service in twenty-six states and wireless Lifeline service in twenty-six states and territories.⁹ Global Connection is a wholly-owned subsidiary of Global Connection Holdings Corporation (Global Holdings).¹⁰ Odin Mobile LLC has entered into a purchase agreement to acquire a majority ownership interest in Global Holdings.¹¹ Pursuant to the terms of the agreement, Odin Mobile will acquire 75 percent of Global Holdings' stock.¹² Global Holdings will retain the remaining minority ownership interest.¹³

The Bureau has reviewed Global Connection's combined wireline and wireless compliance plan for conformance with the relevant requirements, and now approves the compliance plan. We note that with respect to this matter, Global Connection will remain the only entity with an approved compliance plan. Additionally, Global Connection must continue to comply with any future additions to or amendments of the Lifeline program rules unless it has relinquished its relevant designation(s) pursuant to section 214(e)(4) of the Act.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Christian Hoefly, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-3607.

- FCC -

(Continued from previous page) _____
Global Connection and Phone Club Corporation, Public Notice, 31 FCC Rcd 8860 (WCB 2016).

⁹ *Global Connection Compliance Plan*, at 3. The twenty-six wireline states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. The twenty-six wireless states and territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

¹⁰ *Global Connection Compliance Plan*, at 3.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

JOHN J. HEITMANN

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

AUSTIN, TX
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HOUSTON, TX
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STAMFORD, CT
BRUSSELS, BELGIUM

AFFILIATE OFFICE
MUMBAI, INDIA

April 16, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Revised Wireless and Wireline
Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On February 22, 2017, Global Connection Inc. of America (Global Connection or Company) submitted for approval from the Wireline Competition Bureau (Bureau) an Amended Compliance Plan for both its wireline¹ and wireless² Lifeline services. Pursuant to discussions with Bureau staff, Global Connection hereby submits a revised version of its pending Amended Compliance Plan, updating the information provided therein to reflect the passage of time.

Current Wireless and Wireline Operations

As discussed in the Amended Compliance Plan, Global Connection currently provides

¹ The Company has an approved wireline Compliance plan, originally filed on June 26, 2012 and most recently revised on July 14, 2016. The Bureau approved Global Connection's wireline Compliance Plan on August 10, 2016. See *Wireline Competition Bureau Approves the Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 16-905 (rel. Aug. 10, 2016).

² The Company has an approved wireless Compliance Plan, originally filed on March 8, 2012 and most recently revised on April 30, 2012. The Bureau approved Global Connection's wireless Compliance Plan on May 25, 2012. See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

Marlene H. Dortch, Secretary
April 16, 2018
Page Two

wireless service in twenty-six (26) territories and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states. The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states, and on a wireless basis in all twenty-six (26) of its wireless service state territories.

Compliance Plan Updates Due to the Passage of Time

The proposed Amended Compliance Plan has been revised to update the details of Global Connection's wireline and wireless operations and Lifeline ETC designations (*see pp. 3-4*), customer service contact information (*see p. 13*) and financial and technical capability (*see pp. 26-31*). It also incorporates revisions to Company procedures and commitments throughout to reflect recent changes to Lifeline program rules. Global Connection provides updates regarding its handset policies (*see pp. 6-7*), its enrollment process, including changes to reflect enrollments using the National Verifier where available (*see pp. 7, 9, 10, 17*), explains its rolling annual recertification process (*see pp. 17-18*) and provides updates regarding means to ensure compliance with the one-per-household requirement (*see pp. 20-21*). In addition, the Amended Compliance Plan provides the Company's current wireline and wireless Lifeline service plan options (*see pp. 24-26*). Current exhibit materials for the Company's wireless and wireline Lifeline operations (sample enrollment forms, income eligibility worksheets, one-per-household worksheets, and marketing materials) are included.

Global Connection hereby submits its proposed Amended Compliance Plan with the above-described revisions. The Company respectfully reiterates its request for expeditious approval of its Amended Compliance Plan in order to ensure continued provision of wireline and wireless Lifeline services as discussed herein.

This letter and revised Amended Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 16, 2018
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Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Ryan Palmer
Jodie Griffin

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plan outlining the measures it will take to comply with the Federal Communications Commission’s (“Commission’s” or “FCC’s”) Lifeline rules and implement the conditions imposed by the Commission in its Lifeline program rules and implementing orders and guidance.² On March 8, 2012, Global Connection filed a Compliance Plan

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its holding company as Global Connection Holdings Corporation (“Global Holdings”). Global Connection has no separate operating companies and no affiliates. Following the change in Global Connection’s majority ownership proposed herein, the Company’s corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies. Following the change in majority ownership, Global Connection will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless discussed in detail in Section III herein and Cintex Wireless, LLC, a Maryland limited liability company providing Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and wholesale wireless communications services.

² See *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 (Feb. 6, 2012) (“2012

for its wireless service. Global Connection’s wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.³ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on July 14, 2016. Global Connection’s wireline Compliance Plan was approved by the Wireline Competition Bureau (“Bureau”) on August 10, 2016.⁴ On February 22, 2017, Global Connection filed a revised wireless Compliance Plan to reflect a proposed change in ownership of the Company, include Global Connection’s wireline Lifeline services, and otherwise update the information provided therein. Global Connection files this revised Compliance Plan to further update the information provided herein due to the passage of time.⁵

Lifeline Reform Order”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) (“*Compliance Plan Public Notice*”). See also *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) (“*2015 Lifeline Order*”); *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*2016 Lifeline Modernization Order*”); *Bridging the Digital Divide for Low-Income Consumers Lifeline and Link Up Reform and Modernization Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (2017) (“*2017 Lifeline Digital Divide Order*”).

³ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

⁴ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

⁵ Global Connection also has a Petition for Eligible Telecommunications Carrier (“ETC”) Designation in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia (“ETC Petition”) pending at the Commission. See *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia* (“ETC Petition”) WC Docket No. 09-197, filed April 4, 2012. This ETC Petition was subsequently amended on February 26, 2013 to update it in light of the Commission’s rule changes affecting Lifeline-only ETCs. Global

Global Connection provides wireless service in twenty-six (26) territories⁶ and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states.⁷ The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states,⁸ and on a wireless basis in all twenty-six (26) of its wireless service territories.

Change in Ownership of Global Connection

As noted above, Global Connection is currently wholly-owned by Global Holdings. As described in Section III below, Global Holdings, Global Connection and Odin Mobile, LLC (“Odin Mobile”) have entered into an agreement pursuant to which Odin Mobile will acquire seventy five percent (75%) of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the majority interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority direct interest in Global Connection (twenty five percent (25%)). The transaction will not result in any loss or impairment of service for any customer.

Connection still seeks Lifeline-only designation for which the Commission is the proper designating authority, because the states lack the authority to perform such designation for wireless telecommunications service providers seeking designation.

⁶ Those twenty-six territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁷ Those twenty-six states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁸ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.⁹

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order and 2016 Lifeline Modernization Order, as well as with the Commission's Lifeline rules and policies more generally.¹⁰ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the Lifeline program rules and orders, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

⁹ See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹⁰ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

ACCESS TO 911 AND E911 SERVICES¹¹

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company:

(1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹² The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services. The Company will provide its wireless Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all of the Company's wireless customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining. All of the Company's wireline customers will have available access to emergency calling services at the time that Lifeline service is initiated. This 911 and E911 access will be available to those using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint, Verizon Wireless, AT&T and T-Mobile as its underlying network providers/carriers for its wireless services and AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers

¹¹ See Compliance Plan Public Notice at 3.

¹² See 2012 Lifeline Reform Order ¶ 373.

route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

For the Company's wireless service, to the extent that Global Connection's underlying providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. For the Company's wireless voice telephony service, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection's handsets provided in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models provided meet all 911 and E911 requirements. As a result, any existing wireless 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. Any new customer that qualifies for and enrolls in Global Connection's Lifeline voice telephony service can choose to use their own device or receive one from Global Connection, which will be 911/E911-compliant. As discussed above, this requirement does not apply to Global Connection's wireline services.

To further obtain the benefits of a modernized Lifeline program, the 2016 Lifeline Modernization Order also set forth the requirement that Lifeline providers providing both mobile broadband services and devices to their consumers provide handset devices that are Wi-Fi enabled.¹³ The Commission further requires such providers to offer the choice to Lifeline customers of devices

¹³ See 2016 Lifeline Modernization Order ¶ 366.

that are equipped with hotspot functionality.¹⁴ Pursuant to the Lifeline rules, Global Connection will provide handset devices that are Wi-Fi enabled as well as the choice to consumers to acquire devices that are equipped with hotspot functionality as outlined in the 2016 Lifeline Modernization Order.¹⁵

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁶

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as amended by and through the 2016 Lifeline Modernization Order, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC. Applicants in states where the National Verifier is available will be enrolled after their eligibility has been determined by the National Verifier.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below one hundred-thirty five percent (135%) of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database ("NLAD"), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

¹⁴ *See id.* The 2016 Lifeline Modernization Order clarifies that the requirement to provide Wi-Fi-enabled handsets does not apply to Global Connection devices provided prior to the effective date of the rule (December 2, 2016).

¹⁵ *See* 2016 Lifeline Modernization Order ¶ 378. *See also* 47 C.F.R. § 54.408(f).

¹⁶ *See* Compliance Plan Public Notice at 3.

B. Eligibility Determination

For both wireless and wireline Lifeline services, customers can enroll in person by calling Global Connection's customer service center or online. For the Company's wireless service, more than ninety percent (90%) of customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet.

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (“TPIV”) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state or federal eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately forty percent (40%) of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly five hundred (500) active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁷

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁸ and the address is checked

¹⁷ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

¹⁸ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the 2015 Lifeline Order. *See* 2015 Lifeline Order ¶ 224, *supra* n. 2.

against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.¹⁹

All agents enrolling Lifeline customers for Global Connection have a portal login, which tracks the agent's activities²⁰ and allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers may also complete the Certification form through our Lifeline Interactive Voice Response Line and following the prompts. Customers will either fax, email or mail a copy of their eligibility proof and copy of government-issued identification.

Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility and government-issued identification.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification

¹⁹ See *infra* Section I.F. regarding use of the NLAD.

²⁰ Global Connection fully supports USAC's efforts to register agents for tracking in the NLAD and the National Verifier.

requirements in the Commission's rules and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases (including the National Verifier, once in place), Company personnel, who are non-commissioned employees, will collect documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal income-based and/or program-based criteria set forth in 47 C.F.R. § 54.409. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules. A Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on a request for reimbursement.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² In the absence of the National Verifier or a state eligibility database, acceptable documentation of program eligibility as defined by the Lifeline rules is reviewed by a Global Connection employee during the electronic order process. Acceptable documentation of program eligibility includes: (1) the current or prior year's

²¹ See 2012 Lifeline Reform Order ¶ 100; 2016 Lifeline Modernization Order ¶ 416. 47 C.F.R § 54.410(b)(1)(i)(B), 47 C.F.R § 54.410(c)(1)(i)(B).

²² See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

statement of benefits from a qualifying assistance program; (2) a notice or letter of participation in a qualifying assistance program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.²³

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months' time.²⁴ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.²⁵

Company personnel will examine this documentation for each Lifeline applicant, and comply with the requirement to retain and protect proof of eligibility.²⁶ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection. In the event that

²³ See 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

²⁴ See 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See *id.*

²⁶ See 2015 Lifeline Order ¶ 224 *supra* n. 2; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁷

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[I]licensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁸ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a non-commissioned Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on a request for reimbursement. The Company will therefore always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the

²⁷ See 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, FCC 05-165, ¶ 19 (2005).

²⁸ 2012 Lifeline Reform Order ¶ 110.

subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber thirty (30) days to demonstrate continued eligibility.²⁹ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

As required by the Commission's rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two (2) business days.³⁰ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-331-1059 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7 PM Eastern, Monday through Friday, and 10 AM to 2 PM Eastern on Saturday, excluding holidays.

C. Subscriber Certifications for Enrollment

Global Connection has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Commission's Lifeline rules, together with any additional state certification requirements.³¹ The Company shares the Commission's concern about abuse of the Lifeline program and is thus

²⁹ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³⁰ See 47 C.F.R. § 54.405(e)(5).

³¹ 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³² Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³³ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁴

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the

³² See Model Application/Certification Forms, included as **Exhibit A**. Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form by July 1, 2018. See *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018) ("*Lifeline Form Public Notice*"). See also Compliance Plan Public Notice at 3.

³³ See Income Eligibility Worksheets, included as **Exhibit B**. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

³⁴ See 2012 Lifeline Reform Order ¶ 123.

Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.³⁵

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.³⁶

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁷); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁸

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to initial his or her acknowledgement, individually and under penalty of perjury, in

³⁵ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁶ See 47 C.F.R. § 54.405(c).

³⁷ See 2012 Lifeline Reform Order ¶ 87.

³⁸ See 47 C.F.R. § 54.410(d)(2).

writing or by electronic signature or interactive voice response recording,³⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within thirty (30) days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within thirty (30) days; (5) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (6) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (7) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (8) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴⁰ The applicant must also

³⁹ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.⁴¹

D. Annual Verification Procedures

Global Connection re-certifies all subscribers within 12 months after the subscriber's service initiation date and within every 12 months thereafter, except for subscribers in states where the National Verifier, state Lifeline administrator, or other state agency is responsible for the annual re-certification of subscribers' Lifeline eligibility in accordance with section 54.410(f). If the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases containing information regarding enrollment in qualifying assistance programs, then the Company obtains a signed certification from the subscriber on a form that meets the certification requirements in section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.⁴² Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.⁴³ By July 1, 2018, Global Connection will use the standardized form to re-certify a qualifying low-income consumer.⁴⁴

⁴¹ See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

⁴² See 2012 Lifeline Reform Order ¶ 120.

⁴³ See 2012 Lifeline Reform Order ¶ 145.

⁴⁴ See Lifeline Form Public Notice.

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within sixty (60) days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the sixty (60) days, the Company de-enrolls the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.⁴⁶

E. Activation and Non-Usage

For the Company's wireless Lifeline service, Global Connection will not consider a wireless prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.⁴⁷ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

⁴⁵ See revised 47 C.F.R. § 54.54.405(e)(4).

⁴⁶ Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

⁴⁷ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.407(c)(1).

In addition, after service activation, Global Connection will not seek reimbursement from the USF for and will de-enroll any subscriber that has not used Global Connection's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days or during the notice period set forth in 47 C.F.R. 54.405(e)(3), currently a period of 15 days. In accordance with 47 C.F.R. § 54.405(e)(3), Global Connection will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Global Connection will update the NLAD within one (1) business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

Global Connection's wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁴⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to

⁴⁸ See 2012 Lifeline Reform Order at ¶ 257; see also 47 C.F.R. §§ 54.404(b)(10) and 54.405(e)(3), respectively.

⁴⁹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

National Lifeline Accountability Database (NLAD). The Company complies with the requirements of the NLAD and section 54.404 of the Commission’s rules. As such, the Company queries the NLAD for every enrollment⁵⁰ to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁵¹

In addition to checking the NLAD, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every ninety (90) days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵²

⁵⁰ With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵¹ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber’s information in the NLAD within ten (10) business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

⁵² A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An

through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written document based on a USAC form containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁵⁴

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that

"economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵³ See 2012 Lifeline Reform Order ¶ 78.

⁵⁴ *Id.* Samples of Global Connection's one-per-household worksheet are attached as **Exhibit C**. The USAC Household Worksheet is available at http://www.usac.org/res/documents/li/pdf/forms/LI_Worksheet_nonNVstates.pdf. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁵ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁶ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁷ Samples of the Company's marketing materials are included as **Exhibit D**. In addition, the Company's application/certification forms will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements from the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁸ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision

⁵⁵ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁶ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁷ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁸ See 2012 Lifeline Reform Order ¶ 128; 47 C.F.R. § 54.407(d).

of Lifeline support.⁵⁹ In addition, the Company will keep accurate records as directed by USAC⁶⁰ and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, providing the Company's business and affiliate information, terms and conditions of any voice telephony plans offered to Lifeline subscribers, and all other required information and certifications.⁶¹ The Company also submits an annual Form 555 filing to the Commission certifying, under penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) that the Company is in compliance with all federal Lifeline certification procedures; and (3) that the Company is in compliance with the minimum service levels set forth in 47 C.F.R. §54.408.⁶² The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, as amended, annually by January 31st, for its re-certification efforts of the previous year.⁶³

⁵⁹ See 47 C.F.R. § 54.407(a). Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶⁰ See 47 C.F.R. § 54.407(e).

⁶¹ See 47 C.F.R. § 54.422.

⁶² See 47 C.F.R. § 54.416(a).

⁶³ See 47 C.F.R. § 54.416(b).

II. Description of Lifeline Service Offerings⁶⁴

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁵ and throughout the coverage area of its respective, underlying provider(s). Global Connection’s Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408.

Global Connection has revised its Lifeline plans as of December 1, 2017 to comply with the applicable minimum standards set by the Commission. The Company’s current wireless Lifeline offering consists of the following plan options:

Plan Name¹	Voice Minutes Included in Plan	SMS Messages Included in Plan	Data MB Included in Plan	Voicemail Caller ID Call Waiting	Nationwide Long Distance Included	Cost Per Month
StandUP 1 GB Data	500	Unlimited ²	1 GB	YES	YES	Free
StandUP Basic	750	Unlimited ²	100 MB	YES	YES	Free

* 1 Text = 1 Minute

¹ Plan availability based on subscriber’s state of residence; not available in CA or NE. Visit www.StandUPwireless.com or call 1-800-544-4441 for more information.

² Stated pricing for service options do not include applicable state, federal and local taxes and surcharges.

In addition to allotments of voice, text and broadband services, Global Connection’s current wireless Lifeline offering includes a free handset and access to custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes, currently in the following increments:

⁶⁴ See Compliance Plan Public Notice at 3.

⁶⁵ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

Direct Payment Retail Price	Total Credits Provided	Credits per Nationwide Call Minute	Credits per SMS Text Message
\$5	200	1	1
\$10	450	1	1
\$20	1000	1	1
\$30	1500	1	1
\$50	2500	1	1

Additional Data Plans	Total MB Credits Provided
\$3.95	250 MB
\$7.95	500 MB
\$15.95	1 GB

Airtime “top-up” minutes are available for purchase through customer service and on its website. Additional information regarding the Company’s wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company’s wireline Lifeline offerings vary based on the Company’s underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and offers a Lifeline-discounted Basic Package⁶⁶ for \$20.70,⁶⁷ an Advantage Package⁶⁸ for \$25.70 and a Premium Package⁶⁹ for \$30.70 to eligible Lifeline customers. Global Connection resells CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁰ for \$32.95 and an Advantage Package⁷¹ for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia and North

⁶⁶ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁶⁷ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁶⁸ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁶⁹ The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷⁰ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

Carolina, and offers a Lifeline-discounted Basic Package⁷² for \$36.70 and an Advantage Package⁷³ for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁴ for \$36.70 and an Advantage Package⁷⁵ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any wireline service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website www.ConnectWithGlobal.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁶

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. § 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷⁷ Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

⁷² The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷³ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁴ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁵ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁶ See Compliance Plan Public Notice at 3.

⁷⁷ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services which represent the majority of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In addition, Global Connection has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to Global Connection through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement ("Agreement") dated February 16, 2017, by and among Odin Mobile, Global Holdings and Global Connection, Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary. A majority (ninety-nine percent (99%)) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁷⁸ Global Connection customers will continue to receive their existing services at the same or better rates, terms and conditions currently in effect.

Odin Mobile (FRN: 0022135131) is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless service, including to visually impaired consumers by using the T-Mobile USA ("T-Mobile") and Sprint wireless networks through the Mobile Virtual Network Enabler ("MVNE") Prepaid Wireless Wholesale, LLC ("PPWW"), which is owned by Paul Greene. Odin Mobile

⁷⁸ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

purchases wireless services (for voice minutes, text messages, mobile data, etc.) from PPWW, a Maryland limited liability company, on a wholesale basis, packages those services into Odin Mobile's own service plans and pricing, and bundles the wireless service with Odin Mobile's handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile currently provides wireless service in 49 states and Puerto Rico.⁷⁹ Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. Upon approval of the transaction, Odin Mobile will own 75% of Global Connection and plans to transfer all prepaid wireless operations to Global Connection.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC ("PWG"), an MVNE that supplies airtime through the T-Mobile network. PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator ("MVNO") market. PWG and PPWW have no foreign ownership and, like Global Connection, are not foreign carriers and are not affiliated with foreign carriers in any market. PWG is one of the nation's longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

⁷⁹ The only state in which Odin Mobile does not offer service is Alaska.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are inter-connected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator. Specifically, PWG’s network infrastructure and T-Mobile relationship enables PWG to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier’s ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.⁸⁰ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has

⁸⁰ Mr. Greene also owns interest in several other non-communications-related businesses.

held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of Global Connection's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸¹ Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸² Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸³ Global Connection's Lifeline

⁸¹ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit E**.

⁸² Compliance Plan Public Notice at 3.

⁸³ See 47 C.F.R. § 54.202(a)(1).

supported voice services will meet the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated on an annual basis. Global Connection's Lifeline supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated on an annual basis. To the extent Global Connection provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and Global Connection will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

The Company provides all of the communications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include broadband Internet access service ("BIAS"), a supported service as of December 2, 2016, as well as voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set number of minutes of use at no charge to the customer, and can be used for local and domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services and handsets (when applicable).

Finally, Global Connection will not provide toll limitation service (“TLS”) for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸⁴

The Company’s Lifeline wireline offerings include unlimited local calling and plans include prepaid long distance minutes. All wireline customers can purchase additional domestic long distance – unlimited for \$10.00, or 250 minutes for \$5.00. Wireline customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection’s long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this amended Compliance Plan is essential to allow Global Connection to consummate the ownership change as described herein, and demonstrably strengthen the Company’s operating capabilities to

⁸⁴ See 2012 Lifeline Reform Order ¶ 230.

the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan
Jennifer R. Wainwright
Kelley Drye & Warren LLP
3050 K Street, NW, Suite 400
Washington, DC 20007
(202) 342-8400

*Attorneys for Global Connection Inc. of
America*

April 16, 2018

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plan outlining the measures it will take to comply with the Federal Communications Commission’s (“Commission’s” or “FCC’s”) Lifeline rules and implement the conditions imposed by the Commission in its Lifeline program rules and implementing orders and guidance.² On March 8, 2012, Global Connection filed a Compliance Plan

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its holding company as Global Connection Holdings Corporation (“Global Holdings”). Global Connection has no separate operating companies and no affiliates. Following the change in Global Connection’s majority ownership proposed herein, the Company’s corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies. Following the change in majority ownership, Global Connection will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless discussed in detail in Section III herein and Cintex Wireless, LLC, a Maryland limited liability company providing Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and wholesale wireless communications services.

² See *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 (Feb. 6, 2012) (“2012

for its wireless service. Global Connection’s wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.³ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on July 14, 2016. Global Connection’s wireline Compliance Plan was approved by the Wireline Competition Bureau (“Bureau”) on August 10, 2016.⁴ On February 22, 2017, Global Connection filed a revised wireless Compliance Plan to reflect a proposed change in ownership of the Company, include Global Connection’s wireline Lifeline services, and otherwise update the information provided therein. Global Connection files this revised Compliance Plan to further update the information provided herein due to the passage of time.⁵

Lifeline Reform Order”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) (“*Compliance Plan Public Notice*”). See also *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) (“*2015 Lifeline Order*”); *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*2016 Lifeline Modernization Order*”); *Bridging the Digital Divide for Low-Income Consumers Lifeline and Link Up Reform and Modernization Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (2017) (“*2017 Lifeline Digital Divide Order*”).

³ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

⁴ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

⁵ Global Connection also has a Petition for Eligible Telecommunications Carrier (“ETC”) Designation in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia (“ETC Petition”) pending at the Commission. See *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia* (“ETC Petition”) WC Docket No. 09-197, filed April 4, 2012. This ETC Petition was subsequently amended on February 26, 2013 to update it in light of the Commission’s rule changes affecting Lifeline-only ETCs. Global

Global Connection provides wireless service in twenty-six (26) territories⁶ and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states.⁷ The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states,⁸ and on a wireless basis in all twenty-six (26) of its wireless service territories.

Change in Ownership of Global Connection

As noted above, Global Connection is currently wholly-owned by Global Holdings. As described in Section III below, Global Holdings, Global Connection and Odin Mobile, LLC (“Odin Mobile”) have entered into an agreement pursuant to which Odin Mobile will acquire seventy five percent (75%) of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the majority interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority direct interest in Global Connection (twenty five percent (25%)). The transaction will not result in any loss or impairment of service for any customer.

Connection still seeks Lifeline-only designation for which the Commission is the proper designating authority, because the states lack the authority to perform such designation for wireless telecommunications service providers seeking designation.

⁶ Those twenty-six territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁷ Those twenty-six states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁸ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.⁹

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order and 2016 Lifeline Modernization Order, as well as with the Commission's Lifeline rules and policies more generally.¹⁰ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the Lifeline program rules and orders, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

⁹ See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹⁰ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

ACCESS TO 911 AND E911 SERVICES¹¹

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company:

(1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹² The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services. The Company will provide its wireless Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all of the Company's wireless customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining. All of the Company's wireline customers will have available access to emergency calling services at the time that Lifeline service is initiated. This 911 and E911 access will be available to those using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint, Verizon Wireless, AT&T and T-Mobile as its underlying network providers/carriers for its wireless services and AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers

¹¹ See Compliance Plan Public Notice at 3.

¹² See 2012 Lifeline Reform Order ¶ 373.

route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

For the Company's wireless service, to the extent that Global Connection's underlying providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. For the Company's wireless voice telephony service, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection's handsets provided in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models provided meet all 911 and E911 requirements. As a result, any existing wireless 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. Any new customer that qualifies for and enrolls in Global Connection's Lifeline voice telephony service can choose to use their own device or receive one from Global Connection, which will be 911/E911-compliant. As discussed above, this requirement does not apply to Global Connection's wireline services.

To further obtain the benefits of a modernized Lifeline program, the 2016 Lifeline Modernization Order also set forth the requirement that Lifeline providers providing both mobile broadband services and devices to their consumers provide handset devices that are Wi-Fi enabled.¹³ The Commission further requires such providers to offer the choice to Lifeline customers of devices

¹³ See 2016 Lifeline Modernization Order ¶ 366.

that are equipped with hotspot functionality.¹⁴ Pursuant to the Lifeline rules, Global Connection will provide handset devices that are Wi-Fi enabled as well as the choice to consumers to acquire devices that are equipped with hotspot functionality as outlined in the 2016 Lifeline Modernization Order.¹⁵

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁶

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as amended by and through the 2016 Lifeline Modernization Order, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC. Applicants in states where the National Verifier is available will be enrolled after their eligibility has been determined by the National Verifier.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below one hundred-thirty five percent (135%) of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database ("NLAD"), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

¹⁴ *See id.* The 2016 Lifeline Modernization Order clarifies that the requirement to provide Wi-Fi-enabled handsets does not apply to Global Connection devices provided prior to the effective date of the rule (December 2, 2016).

¹⁵ *See* 2016 Lifeline Modernization Order ¶ 378. *See also* 47 C.F.R. § 54.408(f).

¹⁶ *See* Compliance Plan Public Notice at 3.

B. Eligibility Determination

For both wireless and wireline Lifeline services, customers can enroll in person by calling Global Connection's customer service center or online. For the Company's wireless service, more than ninety percent (90%) of customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet.

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (“TPIV”) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state or federal eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately forty percent (40%) of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly five hundred (500) active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁷

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁸ and the address is checked

¹⁷ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

¹⁸ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the 2015 Lifeline Order. *See* 2015 Lifeline Order ¶ 224, *supra* n. 2.

against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.¹⁹

All agents enrolling Lifeline customers for Global Connection have a portal login, which tracks the agent's activities²⁰ and allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers may also complete the Certification form through our Lifeline Interactive Voice Response Line and following the prompts. Customers will either fax, email or mail a copy of their eligibility proof and copy of government-issued identification.

Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility and government-issued identification.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification

¹⁹ See *infra* Section I.F. regarding use of the NLAD.

²⁰ Global Connection fully supports USAC's efforts to register agents for tracking in the NLAD and the National Verifier.

requirements in the Commission's rules and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases (including the National Verifier, once in place), Company personnel, who are non-commissioned employees, will collect documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal income-based and/or program-based criteria set forth in 47 C.F.R. § 54.409. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules. A Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on a request for reimbursement.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² In the absence of the National Verifier or a state eligibility database, acceptable documentation of program eligibility as defined by the Lifeline rules is reviewed by a Global Connection employee during the electronic order process. Acceptable documentation of program eligibility includes: (1) the current or prior year's

²¹ See 2012 Lifeline Reform Order ¶ 100; 2016 Lifeline Modernization Order ¶ 416. 47 C.F.R § 54.410(b)(1)(i)(B), 47 C.F.R § 54.410(c)(1)(i)(B).

²² See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

statement of benefits from a qualifying assistance program; (2) a notice or letter of participation in a qualifying assistance program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.²³

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months' time.²⁴ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.²⁵

Company personnel will examine this documentation for each Lifeline applicant, and comply with the requirement to retain and protect proof of eligibility.²⁶ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection. In the event that

²³ See 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

²⁴ See 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See *id.*

²⁶ See 2015 Lifeline Order ¶ 224 *supra* n. 2; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁷

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[I]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁸ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a non-commissioned Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on a request for reimbursement. The Company will therefore always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the

²⁷ See 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, FCC 05-165, ¶ 19 (2005).

²⁸ 2012 Lifeline Reform Order ¶ 110.

subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber thirty (30) days to demonstrate continued eligibility.²⁹ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

As required by the Commission's rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two (2) business days.³⁰ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-331-1059 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7 PM Eastern, Monday through Friday, and 10 AM to 2 PM Eastern on Saturday, excluding holidays.

C. Subscriber Certifications for Enrollment

Global Connection has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Commission's Lifeline rules, together with any additional state certification requirements.³¹ The Company shares the Commission's concern about abuse of the Lifeline program and is thus

²⁹ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³⁰ See 47 C.F.R. § 54.405(e)(5).

³¹ 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³² Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³³ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁴

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the

³² See Model Application/Certification Forms, included as **Exhibit A**. Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form by July 1, 2018. See *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018) ("*Lifeline Form Public Notice*"). See also Compliance Plan Public Notice at 3.

³³ See Income Eligibility Worksheets, included as **Exhibit B**. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

³⁴ See 2012 Lifeline Reform Order ¶ 123.

Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.³⁵

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.³⁶

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁷); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁸

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to initial his or her acknowledgement, individually and under penalty of perjury, in

³⁵ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁶ See 47 C.F.R. § 54.405(c).

³⁷ See 2012 Lifeline Reform Order ¶ 87.

³⁸ See 47 C.F.R. § 54.410(d)(2).

writing or by electronic signature or interactive voice response recording,³⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within thirty (30) days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within thirty (30) days; (5) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (6) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (7) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (8) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴⁰ The applicant must also

³⁹ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.⁴¹

D. Annual Verification Procedures

Global Connection re-certifies all subscribers within 12 months after the subscriber's service initiation date and within every 12 months thereafter, except for subscribers in states where the National Verifier, state Lifeline administrator, or other state agency is responsible for the annual re-certification of subscribers' Lifeline eligibility in accordance with section 54.410(f). If the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases containing information regarding enrollment in qualifying assistance programs, then the Company obtains a signed certification from the subscriber on a form that meets the certification requirements in section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.⁴² Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.⁴³ By July 1, 2018, Global Connection will use the standardized form to re-certify a qualifying low-income consumer.⁴⁴

⁴¹ See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

⁴² See 2012 Lifeline Reform Order ¶ 120.

⁴³ See 2012 Lifeline Reform Order ¶ 145.

⁴⁴ See Lifeline Form Public Notice.

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within sixty (60) days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the sixty (60) days, the Company de-enrolls the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.⁴⁶

E. Activation and Non-Usage

For the Company's wireless Lifeline service, Global Connection will not consider a wireless prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.⁴⁷ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

⁴⁵ See revised 47 C.F.R. § 54.54.405(e)(4).

⁴⁶ Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

⁴⁷ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.407(c)(1).

In addition, after service activation, Global Connection will not seek reimbursement from the USF for and will de-enroll any subscriber that has not used Global Connection's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days or during the notice period set forth in 47 C.F.R. 54.405(e)(3), currently a period of 15 days. In accordance with 47 C.F.R. § 54.405(e)(3), Global Connection will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Global Connection will update the NLAD within one (1) business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

Global Connection's wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁴⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to

⁴⁸ See 2012 Lifeline Reform Order at ¶ 257; see also 47 C.F.R. §§ 54.404(b)(10) and 54.405(e)(3), respectively.

⁴⁹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

National Lifeline Accountability Database (NLAD). The Company complies with the requirements of the NLAD and section 54.404 of the Commission’s rules. As such, the Company queries the NLAD for every enrollment⁵⁰ to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁵¹

In addition to checking the NLAD, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every ninety (90) days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵²

⁵⁰ With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵¹ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber’s information in the NLAD within ten (10) business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

⁵² A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An

through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written document based on a USAC form containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁵⁴

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that

"economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵³ See 2012 Lifeline Reform Order ¶ 78.

⁵⁴ *Id.* Samples of Global Connection's one-per-household worksheet are attached as **Exhibit C**. The USAC Household Worksheet is available at http://www.usac.org/res/documents/li/pdf/forms/LI_Worksheet_nonNVstates.pdf. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁵ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁶ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁷ Samples of the Company's marketing materials are included as **Exhibit D**. In addition, the Company's application/certification forms will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements from the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁸ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision

⁵⁵ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁶ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁷ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁸ See 2012 Lifeline Reform Order ¶ 128; 47 C.F.R. § 54.407(d).

of Lifeline support.⁵⁹ In addition, the Company will keep accurate records as directed by USAC⁶⁰ and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, providing the Company's business and affiliate information, terms and conditions of any voice telephony plans offered to Lifeline subscribers, and all other required information and certifications.⁶¹ The Company also submits an annual Form 555 filing to the Commission certifying, under penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) that the Company is in compliance with all federal Lifeline certification procedures; and (3) that the Company is in compliance with the minimum service levels set forth in 47 C.F.R. §54.408.⁶² The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, as amended, annually by January 31st, for its re-certification efforts of the previous year.⁶³

⁵⁹ See 47 C.F.R. § 54.407(a). Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶⁰ See 47 C.F.R. § 54.407(e).

⁶¹ See 47 C.F.R. § 54.422.

⁶² See 47 C.F.R. § 54.416(a).

⁶³ See 47 C.F.R. § 54.416(b).

II. Description of Lifeline Service Offerings⁶⁴

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁵ and throughout the coverage area of its respective, underlying provider(s). Global Connection's Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408.

Global Connection has revised its Lifeline plans as of December 1, 2017 to comply with the applicable minimum standards set by the Commission. The Company's current wireless Lifeline offering consists of the following plan options:

Plan Name¹	Voice Minutes Included in Plan	SMS Messages Included in Plan	Data MB Included in Plan	Voicemail Caller ID Call Waiting	Nationwide Long Distance Included	Cost Per Month
StandUP 1 GB Data	500	Unlimited ²	1 GB	YES	YES	Free
StandUP Basic	750	Unlimited ²	100 MB	YES	YES	Free

* 1 Text = 1 Minute

¹ Plan availability based on subscriber's state of residence; not available in CA or NE. Visit www.StandUPwireless.com or call 1-800-544-4441 for more information.

² Stated pricing for service options do not include applicable state, federal and local taxes and surcharges.

In addition to allotments of voice, text and broadband services, Global Connection's current wireless Lifeline offering includes a free handset and access to custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes, currently in the following increments:

⁶⁴ See Compliance Plan Public Notice at 3.

⁶⁵ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

Direct Payment Retail Price	Total Credits Provided	Credits per Nationwide Call Minute	Credits per SMS Text Message
\$5	200	1	1
\$10	450	1	1
\$20	1000	1	1
\$30	1500	1	1
\$50	2500	1	1

Additional Data Plans	Total MB Credits Provided
\$3.95	250 MB
\$7.95	500 MB
\$15.95	1 GB

Airtime “top-up” minutes are available for purchase through customer service and on its website. Additional information regarding the Company’s wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company’s wireline Lifeline offerings vary based on the Company’s underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and offers a Lifeline-discounted Basic Package⁶⁶ for \$20.70,⁶⁷ an Advantage Package⁶⁸ for \$25.70 and a Premium Package⁶⁹ for \$30.70 to eligible Lifeline customers. Global Connection resells CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁰ for \$32.95 and an Advantage Package⁷¹ for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia and North

⁶⁶ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁶⁷ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁶⁸ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁶⁹ The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷⁰ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

Carolina, and offers a Lifeline-discounted Basic Package⁷² for \$36.70 and an Advantage Package⁷³ for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁴ for \$36.70 and an Advantage Package⁷⁵ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any wireline service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website www.ConnectWithGlobal.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁶

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. § 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷⁷ Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

⁷² The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷³ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁴ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁵ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁶ See Compliance Plan Public Notice at 3.

⁷⁷ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services which represent the majority of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In addition, Global Connection has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to Global Connection through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement ("Agreement") dated February 16, 2017, by and among Odin Mobile, Global Holdings and Global Connection, Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary. A majority (ninety-nine percent (99%)) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁷⁸ Global Connection customers will continue to receive their existing services at the same or better rates, terms and conditions currently in effect.

Odin Mobile (FRN: 0022135131) is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless service, including to visually impaired consumers by using the T-Mobile USA ("T-Mobile") and Sprint wireless networks through the Mobile Virtual Network Enabler ("MVNE") Prepaid Wireless Wholesale, LLC ("PPWW"), which is owned by Paul Greene. Odin Mobile

⁷⁸ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

purchases wireless services (for voice minutes, text messages, mobile data, etc.) from PPWW, a Maryland limited liability company, on a wholesale basis, packages those services into Odin Mobile's own service plans and pricing, and bundles the wireless service with Odin Mobile's handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile currently provides wireless service in 49 states and Puerto Rico.⁷⁹ Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. Upon approval of the transaction, Odin Mobile will own 75% of Global Connection and plans to transfer all prepaid wireless operations to Global Connection.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC ("PWG"), an MVNE that supplies airtime through the T-Mobile network. PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator ("MVNO") market. PWG and PPWW have no foreign ownership and, like Global Connection, are not foreign carriers and are not affiliated with foreign carriers in any market. PWG is one of the nation's longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

⁷⁹ The only state in which Odin Mobile does not offer service is Alaska.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are inter-connected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator. Specifically, PWG’s network infrastructure and T-Mobile relationship enables PWG to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier’s ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.⁸⁰ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has

⁸⁰ Mr. Greene also owns interest in several other non-communications-related businesses.

held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of Global Connection's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸¹ Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸² Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸³ Global Connection's Lifeline

⁸¹ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit E**.

⁸² Compliance Plan Public Notice at 3.

⁸³ See 47 C.F.R. § 54.202(a)(1).

supported voice services will meet the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated on an annual basis. Global Connection's Lifeline supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated on an annual basis. To the extent Global Connection provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and Global Connection will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

The Company provides all of the communications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include broadband Internet access service ("BIAS"), a supported service as of December 2, 2016, as well as voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set number of minutes of use at no charge to the customer, and can be used for local and domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services and handsets (when applicable).

Finally, Global Connection will not provide toll limitation service (“TLS”) for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸⁴

The Company’s Lifeline wireline offerings include unlimited local calling and plans include prepaid long distance minutes. All wireline customers can purchase additional domestic long distance – unlimited for \$10.00, or 250 minutes for \$5.00. Wireline customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection’s long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this amended Compliance Plan is essential to allow Global Connection to consummate the ownership change as described herein, and demonstrably strengthen the Company’s operating capabilities to

⁸⁴ See 2012 Lifeline Reform Order ¶ 230.

the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan
Jennifer R. Wainwright
Kelley Drye & Warren LLP
3050 K Street, NW, Suite 400
Washington, DC 20007
(202) 342-8400

*Attorneys for Global Connection Inc. of
America*

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EXHIBIT 4

Current Lifeline Offering and Proposed Tribal Offering

STANDUP WIRELESS LIFELINE OFFERING

	VOICE	TEXT (SMS)	DATA High Speed	LIFELINE PRICE	TRIBAL LIFELINE PRICE
Lifeline-Only Broadband	1,000	Unlimited	4.5 GB	\$0.00	N/A
Lifeline-Only Tribal	Unlimited	Unlimited	6.5 GB	N/A	\$0.00

ADDITIONAL AIRTIME "TOP-UPS"	VOICE	TEXT (SMS)	DATA
\$5.00	250	250	250 MB
\$10.00	None	None	1.5 GB
\$10.00	Unlimited	Unlimited	1 GB
\$20.00	Unlimited	Unlimited	3 GB
\$30.00	Unlimited	Unlimited	8 GB

Top-Ups expire after 30 days

All packages include:

- Free calls to STANDUP Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card