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
Ztar Mobile, Inc.	)	
Petition for Streamlined Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier	)	

ZTAR MOBILE INC.'S PETITION FOR STREAMLINED DESIGNATION AS A LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER

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SUMMARY

Ztar Mobile, Inc. (Ztar Mobile or the Company) seeks designation as a Lifeline Broadband Provider (LBP) eligible telecommunications carrier (ETC), pursuant to section 214(e)(6) of the Communications Act of 1934, as Amended (the Act), section 54.202 of the Federal Communications Commission's (FCC's or the Commission's) rules, the Lifeline Modernization Order,[1] and the Lifeline Broadband Provider Guidance Public Notice[2] for the limited purpose of providing mobile broadband Internet access service (BIAS) supported by the Universal Service Fund (USF) Lifeline program.[3] Section 214(e)(6) permits the Commission to grant LBP ETC designation and the Commission's rules provide that states may not designate LBP ETCs.

As described in greater detail herein, Ztar Mobile satisfies all of the requirements for streamlined designation as an LBP ETC and is committed to complying with all of the Commission's rules and requirements for ETCs providing broadband, including the minimum service standards in section 54.408 of the Commission's rules. The Company has an established track record of providing quality voice and broadband services to non-Lifeline subscribers. The Company has provided local and long distance voice services, as well as broadband services, without interruption, for 12 years. As of October 2016, Ztar Mobile provided voice and/or

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[1] *See 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, third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016) (Lifeline Modernization Order).

[2] *See Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (Lifeline Broadband Provider Guidance Public Notice).

[3] Ztar Mobile's affiliate Free Mobile, Inc. has also filed a petition for LBP designation. Ztar Mobile is an existing mobile voice and broadband service provider. Free Mobile was incorporated as a new and separate company to essentially serve as the Lifeline arm of Ztar Mobile's retail wireless service. If Free Mobile can rely on Ztar Mobile's existing non-Lifeline subscribers and history of providing mobile broadband for streamlined treatment of the Free Mobile petition, then Ztar will withdraw this petition. If Ztar Mobile must be the ETC to receive streamlined review, then it would license the Free Mobile name and use it as a dba of Ztar Mobile. The owners of Ztar Mobile and Free Mobile do not intend to have both entities designated as LBPs to provide Lifeline service.

broadband service to more than 200,000 prepaid wireless subscribers. Therefore Ztar Mobile is eligible for 60-day streamlined processing of its LBP ETC designation and this Petition should be deemed granted within 60 days.[4]

Ztar Mobile's broadband service offering will provide eligible Lifeline subscribers with 500 MB of much-needed Internet access at reliable 3G or 4G LTE speeds each month (depending on the device), in addition to 100 voice minutes and 100 text messages at no cost to the consumer. Ztar Mobile will not conduct credit checks or collect deposits, thereby eliminating service barriers for low-income or credit-challenged subscribers. To maximize consumer choice, customers will also have the option of purchasing additional units of 3G or 4G LTE speed data in affordable increments. This flexibility allows consumers to adjust their broadband service levels to meet their changing needs.

All Lifeline eligible subscribers can bring their own broadband-capable device or may in the future be able to purchase a Wi-Fi-enabled smartphone to use their broadband service.[5] Smartphones will help to address the most compelling needs – including closing the "jobs gap" and the "homework gap" – of these consumers by allowing them to establish email accounts and access Internet- and apps-based job applications; monitor online homework assignments and progress reports; manage medical benefits and appointments; and stay in touch with friends and relatives. In addition, the smartphone with broadband data enables Lifeline subscribers to use many of the advanced applications and services that non-Lifeline subscribers enjoy, including maps, audio and video streaming, educational games, and advanced communications services. Wi-Fi-enabled phones also enable consumers to extend the reach of their Lifeline broadband plan by leveraging free Wi-Fi hotspots in community anchor institutions, retail locations, and elsewhere to utilize additional data. Ztar Mobile's mobile broadband service, coupled with its

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[4] *See* 47 C.F.R. § 54.202(d)(1).

[5] Should Ztar Mobile make devices available in the future, those devices will comport with the Commission's Wi-Fi and hotspot capability requirements. *See* 47 C.F.R. § 54.408(f)(1), (f)(3).

flexible "Bring Your Own Device" program, gives customers the ability to access the Internet from almost anywhere, enabling them to engage in the digital economy in a manner comparable to the access enjoyed by non-Lifeline subscribers. Moreover, available hotspot-capable phones permit Free Mobile's Lifeline subscribers to tether other devices – *e.g.*, tablets, laptops and PCs – to their smartphone to perform tasks such as completing homework assignments or filling out job-applications that are designed for a larger screen.

Designation of Ztar Mobile as an LBP ETC is in the public interest. Such designation will provide consumers with an alternative for obtaining quality, reliable and convenient 3G or 4G LTE broadband service, when and where they need it, and will introduce new competition to the Lifeline market. This competition, in turn, will motivate other service providers to improve their service offerings to low-income consumers, thereby spurring service-level innovation in the Lifeline broadband service market. Consumers will gain convenient and immediate Internet access as an alternative to school or library broadband Internet access that may be effectively unavailable or simply not the best option for the consumer. Additionally, the prepaid nature of Ztar Mobile's broadband service reduces barriers to adoption and enables low-income consumers to anticipate and control their broadband costs more effectively so that they can stay connected. Ztar Mobile's proposed Lifeline-supported broadband service offerings promote the goals of the Act as the Company's plans "secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies" to consumers.[6] Accordingly, and consistent with the streamlined processing provided for LBP ETCs in the Lifeline Modernization Order, Ztar Mobile respectfully requests expeditious review and approval of this Petition no later than December 2, 2016.

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[6] Telecommunications Act of 1996, 47 USC §§ 151 *et seq*.

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ZTAR MOBILE, INC.'S
PETITION FOR STREAMLINED DESIGNATION AS A LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER

Ztar Mobile, Inc. (Ztar Mobile or the Company), pursuant to section 214(e) of the Communications Act of 1934, as Amended (the Act), 47 U.S.C. § 214(e) and section 54.202 of the Federal Communications Commission's (Commission's or FCC's) rules, 47 C.F.R. § 54.202, hereby requests streamlined designation as a Lifeline Broadband Provider (LBP) eligible telecommunications carrier (ETC) in eight states for the sole purpose of receiving universal service Lifeline support for the provision of broadband Internet access service (BIAS).[7] Ztar

[7] *See 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, third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016) (Lifeline Modernization Order) and *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 16-118 (rel. Sept. 30, 2016) (Lifeline Broadband Provider Guidance Public Notice). Broadband Internet access service is as defined by the Commission as a "service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all Internet endpoints,

Mobile does not request ETC status for the purpose of receiving support for voice services or from any of the other Universal Service Funds (USF), nor does it seek support from the Link Up program.

The Commission has sole jurisdiction, pursuant to section 214(e)(6), to review and grant the Company's request for designation as an LBP ETC and, in its Lifeline Modernization Order, the Commission explicitly preempted state designation of broadband providers.[8] Moreover, the Commission ruled that applicants already possessing Lifeline-only ETC designation do not need to seek additional designation to receive support for BIAS.[9] Petitions for LBP ETC designation will be deemed granted within sixty days of the filing date for applicants that have provided BIAS to the public for at least two years and serve at least 1,000 non-Lifeline subscribers with voice telephony and/or BIAS as of the filing date.[10] By this Petition, Ztar Mobile requests LBP ETC designation in Alabama, California, Florida, Illinois, Mississippi, New Jersey, New York, and Texas.

As discussed in more detail below, Ztar Mobile meets the requirements for designation as an LBP ETC and is able and prepared to offer the Lifeline-supported mobile broadband service in the requested territory. Granting Ztar Mobile LBP ETC status will benefit the public interest

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including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service." *Id*., ¶30.

[8] *See* Lifeline Modernization Order ¶ 232.

[9] *See* Lifeline Modernization Order ¶¶ 298-299.

[10] *See* 47 C.F.R. § 54.202(d)(1). Ztar Mobile's affiliate Free Mobile, Inc. has also filed a petition for LBP designation. Ztar Mobile is an existing mobile voice and broadband service provider. Free Mobile was incorporated as a new and separate company to essentially serve as the Lifeline arm of Ztar Mobile's retail wireless service. If Free Mobile can rely on Ztar Mobile's existing non-Lifeline subscribers and history of providing mobile broadband for streamlined treatment of the Free Mobile petition, then Ztar will withdraw this petition. If Ztar Mobile must be the ETC to receive streamlined review, then it would license the Free Mobile name and use it as a dba of Ztar Mobile. The owners of Ztar Mobile and Free Mobile do not intend to have both entities designated as LBPs to provide Lifeline service.

by increasing the availability of quality broadband service offerings to a broad range of low-income consumers eligible for Lifeline benefits.

I. ABOUT ZTAR MOBILE

Ztar Mobile is an established provider of wireless voice and broadband services.[11] Ztar Mobile has provided local and long distance voice services, as well as broadband services, without interruption, for over 12 years, and currently provides services to more than 200,000 non-Lifeline customers. Ztar Mobile will offer its broadband Lifeline services to Tribal and non-Tribal Lifeline eligible subscribers throughout the coverage area of its underlying carriers from which it purchases wireless network services on a wholesale basis and resells the services to its subscribers.[12]

Ztar Mobile's proposed Lifeline-supported mobile broadband service will provide eligible subscribers with fast and convenient Internet access for activities ranging from researching and applying for jobs to completing homework assignments. The non-Tribal broadband offering will provide 500 MB of data (with rollover), 100 voice minutes, and 100 text messages, each month at no cost to the consumer.[13] To maximize choice, subscribers also will

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[11] The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Ztar Mobile Canada, Inc.; Ztar Mobile Asia; Good2GO Mobile, Inc.; Blitz Mobile, Inc.; Pavo Communications, Inc. (owner/controller of Pavo Communications Sdn Bhd., a Malaysian corporation); GE Holdings, Inc.; Spring Card Systems, LLC; MGTCO Holdings, LLC; and Free Mobile, Inc. (Free Mobile). Ztar Mobile is the only entity currently providing telecommunications service in the United States.

[12] Ztar Mobile would like to provide its Lifeline broadband services through its affiliate, Free Mobile, a Texas corporation that was incorporated as a new and separate company to essentially serve as the Lifeline arm of the retail wireless service of Ztar Mobile. Ztar Mobile has direct contract relationships with AT&T and Sprint, through which it purchases minutes for resale and obtains from AT&T and Sprint the network infrastructure and transmission facilities to allow Free Mobile to operate as a Mobile Virtual Network Operator (MVNO).

[13] Ztar Mobile alternatively will offer a plan that includes 500 MB of mobile broadband data (with rollover), unlimited voice minutes, and unlimited text messages, at a cost of $10 per month. Ztar Mobile further will offer a plan that includes 2 GB of mobile broadband data at no cost to the consumer to eligible subscribers residing on Tribal lands.

have the option of purchasing additional units of broadband service also at 3G or 4G LTE speeds. The availability of "top-up" data in affordable increments will give subscribers the flexibility to tailor their broadband services to meet changing needs.

Ztar Mobile's proposed Lifeline offering is unique in that it will encourage customers to bring their own GSM-compatible handset and receive a Ztar Mobile SIM (Subscriber Identity Module) card at no cost.[14] Ztar Mobile employees, agents or representatives (personnel) will screen applicants before they begin the enrollment process to determine whether or not they have and intend to use an unlocked GSM handset with a Ztar Mobile SIM card; personnel will explain that the existing handset cannot be currently under contract with another carrier's service or associated with a negative account balance, and cannot be associated with an existing Lifeline-supported service. In an effort to avoid customer confusion, Ztar Mobile will convey on its certification form and in verbal interaction with its Lifeline applicants that a SIM card equates to a phone and subscribers can have only one Lifeline-supported service per household, whether through a SIM card or a phone. Ztar Mobile will ensure that Company personnel are trained to specifically educate subscribers on this point before and during the enrollment process. Ztar Mobile will also require an additional attestation on the certification form whereby subscribers must affirm that they will be using their existing handset with Ztar Mobile's service, and the handset (or SIM card that was removed from the handset, if applicable) is not currently associated with Lifeline service.

[14] The free SIM card is available with the underlying service by AT&T. Based on market developments, Free Mobile may offer a handset in the future, and if it does, the handsets will comply with the Lifeline handset requirements in section 54.408(f) of the Commission's rules.

II. ZTAR MOBILE MEETS THE COMMISSION'S REQUIREMENTS FOR DESIGNATION AS A LIFELINE BROADBAND PROVIDER AND FOR STREAMLINED PROCESSING OF THIS PETITION

Section 54.202 of the Commission's rules outlines the requirements that must be met before the FCC can designate a carrier as an LBP ETC. As discussed in further detail below, Ztar Mobile meets these requirements and LBP ETC designation is warranted. Further, Ztar Mobile qualifies for 60-day streamlined processing of this Petition.

a) *Ztar Mobile is a common carrier*.[15]

As a provider of BIAS to the public, Ztar Mobile is a common carrier. In the Lifeline Modernization Order, the Commission recognized BIAS as a telecommunications service, which providers have been able to offer as a common carrier service since 2007.[16]

Further, the Commission has consistently held that providers of wireless services are to be treated as common carriers for regulatory purposes. Section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers.[17] Ztar Mobile provides wireless telecommunications services and, accordingly, is a common carrier.

b) *Ztar Mobile will provide supported Lifeline services by reselling the services of its underlying carriers.*

Section 214(e)(1)(A) of the Act states that an ETC must provide services "using its own facilities or a combination of its own facilities and resale of another carrier's services."[18]

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[15] *See* 47 U.S.C. § 214(e)(1).

[16] *See* Lifeline Modernization Order ¶ 39 and n. 92 (citing to *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, Report and Order on Remand, Declaratory Ruling, FCC 15-24, ¶¶ 331-335 (2015) and *Appropriate Regulatory Treatment for Broadband Access to the Internet Over Wireless Networks*, WT Docket No. 07-53, Declaratory Ruling, FCC 07-30, ¶ 33 (2007)).

[17] 47 U.S.C. § 332(c)(1)(A).

[18] 47 U.S.C. § 214(e)(1)(A).

However, the Commission's 2012 Lifeline Reform Order granted blanket forbearance from the own facilities requirement, subject to conditions, to all ETC petitioners seeking limited ETC designation to participate in the Lifeline program.[19] That forbearance was conditioned upon the Applicant's provision of 911 service and the applicant having obtained an approved compliance plan.[20] However, by its nature, broadband service does not include 911 service capability and the Commission's Lifeline Modernization Order specifically exempts non-facilities-based broadband provider applicants from the requirement to obtain approval of a compliance plan before receiving LBP designation.[21] Accordingly, Ztar Mobile is not required to meet the "own facilities" requirement of section 214(e)(1)(A).

> c) *Ztar Mobile certifies it will comply with the service requirements applicable to the support the Company receives, including the applicable minimum service standards*.[22]

Ztar Mobile certifies that it will comply with the service requirements applicable to the support the Company receives, including the applicable minimum service standards.[23] Ztar Mobile will provide Lifeline-supported mobile broadband service[24] and will make the services available to all qualified consumers consistent with the coverage area of its underlying providers. Included as an **Exhibit** is a chart identifying the states and service areas by zip code in which

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[19] *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, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, ¶ 368 (2012) (2012 Lifeline Reform Order).

[20] 2012 Lifeline Reform Order ¶¶ 368, 373.

[21] *See* Lifeline Modernization Order n.739.

[22] 47 C.F.R. §§ 54.202(a)(1)(i); 54.408; Lifeline Broadband Provider Guidance Public Notice ¶ 10.

[23] *Id*.

[24] *See* 47 C.F.R. § 54.201(d)(1).

Ztar Mobile seeks designation as an LBP ETC to provide Lifeline broadband service.[25] The Company seeks designation to serve any subscribers within the wireless network footprint of its underlying providers in those states. The Company's underlying providers are currently AT&T and Sprint, but may be changed or supplemented in the future. The Company's broadband service will enable subscribers to transmit data to and receive data from all or substantially all Internet endpoints and will include all capabilities incidental to, or that enable the operation of the communications service. The service will enable such transmission and receipt by wire or radio and excludes dial-up Internet access service.

Ztar Mobile's Lifeline-supported mobile broadband service will comply with the Lifeline program's minimum service standards.[26] Ztar Mobile will provide the following service plans:[27]

	Plan 1	**Plan 2**	**Tribal**
Data	500 MB (with rollover)[28]	500 MB (with rollover)	2 GB
Voice Minutes	100	Unlimited	None
Texts	100	Unlimited	None
Price to Lifeline Subscribers	No Cost	$10/month	No Cost

[25] *See* Lifeline Broadband Provider Guidance Public Notice ¶ 11.

[26] *See* 47 C.F.R. § 54.408(b)(2).

[27] Lifeline Modernization Order ¶ 96; 47 C.F.R. § 54.408(c)(2); Lifeline Broadband Provider Guidance Public Notice ¶ 10.

[28] Monthly unused high-speed data from plan allowance rounds up to the nearest MB and carries over for one 30-day renewal period when the plan renews on time. Unused Data Rollover automatically expires after one renewal period, or with any plan change (such as changing monthly plan or balance expiration). Data Rollover is used after the monthly high-speed plan allowance. Data Rollover is used only after the full plan data allowance for the current cycle is used. Once subscribers exceed their plan's current allowance, plus any available other data allotments, they will automatically start using their available Rollover Data. There is 5GB cap on the amount of unused plan data within a given month that is eligible for rollover.

The Company understands that it must continue to comply with any future additions to or amendments of the Lifeline rules and will revise its offerings as necessary to comply, in the future, with updated service standards.[29] Ztar Mobile will not conduct credit checks, require contracts or collect deposits, thereby eliminating the barriers to service often confronting many Lifeline-eligible consumers. To maximize consumer choice, consumers will also have the option of purchasing the following data and/or voice top ups:

- 500 MB data - $10
- 500 minutes and 500 texts - $10
- 1 GB data - $15
- Unlimited minutes and texts - $15

These supplemental packages, or "top-up" data, will be available for purchase at Ztar Mobile's website, by telephone or in thousands of retail locations where good2Go Mobile top-ups are available.[30] Ztar Mobile's terms and conditions for its Lifeline-supported mobile broadband plans will be included on the website for its affiliate Free Mobile, at www.freemobileusa.com.[31]

d) *Ztar Mobile has the ability to remain functional in emergency situations*.[32]

As noted above, Ztar Mobile currently plans to utilize AT&T and Sprint to provide its mobile broadband services and certifies that the network over which the Lifeline-supported service is provided is capable of remaining functional in emergency situations. The Company has access to the extensive and well-established AT&T and Sprint networks and facilities and

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[29] *See* Lifeline Modernization Order ¶ 93; 47 C.F.R. §§ 54.408(a)(2), (b)(2)(ii), (c).

[30] Ztar Mobile has access to over 50,000 retail distribution points throughout the United States. These retail distribution points consist of major retail partners.

[31] *See* Lifeline Broadband Provider Guidance Public Notice ¶ 10.

[32] *See* 47 C.F.R. § 54.202(a)(2); Lifeline Broadband Provider Guidance Public Notice ¶ 10.

believes that those companies' networks are capable of managing traffic spikes that may occur during emergency situations and can reroute traffic in the event of damaged facilities. Ztar Mobile also understands that AT&T and Sprint have sufficient back-up power to ensure functionality if its external power supply is unavailable.

> e) *Ztar Mobile will satisfy applicable consumer protection and service quality standards*.[33]

Section 54.202(a)(3) of the Commission's rules states that a wireless applicant's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service (CTIA Consumer Code) will satisfy this consumer protection and service quality requirement. Ztar Mobile fully complies with applicable consumer protection requirements and commits to comply with the CTIA Consumer Code. Ztar Mobile complies with the CTIA Consumer Code to ensure it offers its subscribers the highest level of protection and quality service. Ztar Mobile's pledge to provide quality service and voluntarily to comply with this code evidences its commitment to satisfying all of the applicable consumer protection and service quality standards. For example, Ztar Mobile's Customer Service department is available Monday through Sunday from 7am to 11pm EST and can be reached by dialing 1-855-281-9333. Alternatively, Ztar Mobile subscribers can reach the Customer Service department by dialing 611 from their Ztar Mobile smartphone device.

> f) *Ztar Mobile is financially and technically capable of providing Lifeline-supported mobile broadband services in compliance with the Commission's rules*.[34]

Commission rule 54.202(a)(4) requires ETC petitioners to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.[35] Ztar

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[33] *See* 47 C.F.R. § 54.202(a)(3); Lifeline Broadband Provider Guidance Public Notice ¶ 10.

[34] *See* 47 C.F.R. § 54.202(a)(4); Lifeline Broadband Provider Guidance Public Notice ¶ 10.

Mobile has been providing prepaid wireless voice and broadband service for more than 12 years and currently provides services to more than 200,000 non-Lifeline customers. Consequently, the Company has access to sufficient funds to operate its business and will not be solely dependent on reimbursement from the Lifeline Fund. In addition, Ztar Mobile's over 12 years of experience providing telecommunications services and reliance on the network of its underlying carrier ensures that the Company has the technical capability to provide Lifeline broadband services in accordance with the Commission's rules.

g) *Terms and conditions of Ztar Mobile's Broadband plan for Lifeline subscribers*.[36]

Ztar Mobile will offer Lifeline subscribers multiple market-leading broadband service options as described above. To maximize consumer choice and flexibility, consumers will also have the option of purchasing additional units of data top ups, at the following rates:

- 500 MB data - $10
- 500 minutes and 500 texts - $10
- 1 GB data - $15
- Unlimited minutes and texts - $15

These supplemental packages, or "top-up" minutes and data, will be available for purchase at the Free Mobile website or by telephone. Additional information regarding the Company's plans, rates and services as well as the applicable terms and conditions, are included on the Free Mobile website at www.freemobileusa.com.

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[35] *See id*.

[36] *See* 47 C.F.R. § 54.202(a)(6); Lifeline Broadband Provider Guidance Public Notice ¶ 10.

h) Ztar Mobile will advertise the availability of its service and charges in a manner reasonably designed to reach Lifeline-eligible consumers and will comply with the Commission's revised rules regarding information to be included in advertisements.[37]

Ztar Mobile intends to offer its Lifeline-supported mobile broadband services to all eligible low-income consumers and, accordingly, will advertise its Lifeline services using media reasonably calculated to reach the general public as clarified in the Lifeline Modernization Order. In that order, the Commission clarified that "media of general distribution" is "any media reasonably calculated to reach the general public or, for an LBP, the specific audience that makes up the demographic for a particular service offering."[38] Ztar Mobile's advertising may include mobile enrollment events as a means of reaching those consumers that are likely to qualify for Lifeline broadband services and who may lack available means to fax or scan and email proof of eligibility documents. The Company will use these media to advertise the availability of its services to Lifeline subscribers and will expand its advertising efforts if necessary to ensure that Lifeline-eligible subscribers are aware of the service offerings.[39]

Ztar Mobile will ensure that all of its Lifeline advertising materials comply with section 54.405(c) of the Commission's rules. Specifically, Ztar Mobile's advertising materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) that

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[37] *See* 47 C.F.R. §§ 54.201(d)(2), 54.405(b); 47 U.S.C. § 214(e)(1)(B).

[38] Lifeline Modernization Order ¶ 364.

[39] *See* 47 C.F.R. § 54.405(b).

documentation is necessary for enrollment; and (vii) Ztar Mobile is the provider of the services.[40] In addition, Ztar Mobile's application/certification form will state that subscribers 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.

i) Ztar Mobile will comply with the additional ETC obligations.

Ztar Mobile is aware of the Commission's current requirements regarding certification and verification of a customer's qualification for Lifeline service[41] and has implemented procedures to ensure the requirements are met.[42] Ztar Mobile has detailed and comprehensive procedures in place to address customer certification and verification requirements as well as those requirements addressing de-enrollment and duplication of benefits.[43] These procedures comply with the Commission's customer certification and verification requirements.[44] Ztar Mobile also will check the customer's name and address against the National Lifeline Accountability Database prior to initiating service and will utilize the National Lifeline Eligibility Verifier once that system is available.[45] Ztar Mobile also will comply with the annual certification and reporting requirements and the Commission's measures to prevent waste, fraud and abuse of Lifeline services.[46] Ztar Mobile will not seek Lifeline reimbursement for any

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[40] *See* 47 C.F.R. § 54.405(c).

[41] *See* 47 C.F.R. § 54.410.

[42] 2012 Lifeline Reform Order ¶ 110. Ztar Mobile will retain copies of documentation demonstrating the applicant's income-based or program-based eligibility determination for Lifeline service as required by Commission rules. *See* 47 C.F.R. § 54.410(b)(1)(ii), (c)(1)(ii).

[43] *See* 47 C.F.R. §§ 54.405(e), 54.410(d)-(f).

[44] *See* 47 C.F.R. § 54.410.

[45] *See* Lifeline Modernization Order ¶ 126.

[46] *See* 47 C.F.R. §§ 54.416, 54.422.

subscriber that received Lifeline-supported mobile broadband service from another provider within the previous 12 months except as permitted by Commission rules.[47]

Further, Ztar Mobile will not enroll applicants at retail locations where the Company does not have an agency agreement with the retailer. Ztar Mobile will require an agent retailer to have any employees involved in the enrollment process go through the Company's Lifeline-specific training as it would for any other agent. By establishing agency relationships with all of its field representatives Ztar Mobile will meet the "deal directly" requirement adopted in the TracFone Forbearance Order.[48]

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 '[l]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"[49] Because Ztar Mobile is responsible for the actions of all of its employees and agents, including those enrolling subscribers in any Ztar Mobile owned or affiliated retail locations, and a Ztar Mobile employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that subscriber on an FCC Form 497 for reimbursement, the Company will always "deal directly" with its subscribers to certify and verify the customer's Lifeline eligibility.

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[47] *See* 47 C.F.R. § 54.411(a),(c).

[48] *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).

[49] 2012 Lifeline Reform Order ¶ 110.

Finally, Ztar Mobile does not charge a number-portability fee for Lifeline accounts.[50] Ztar Mobile timely pays all applicable federal, state, and local regulatory fees, including universal service and E911 fees.

j) Ztar Mobile qualifies for streamlined processing of its LBP ETC designation.

The Commission's Lifeline Modernization Order, as reflected in new rule 54.202(d), provides a streamlined process for approving LBP ETC petitions where certain criteria are met.[51] To qualify for LBP ETC designation, applicants must meet the ETC requirements of section 214(e) of the Act, and FCC rules 54.201 and 54.202.[52] However, petitions for LBP ETC designation will be deemed granted, unless the Commission notifies the applicant otherwise, within sixty days of the submission of a complete petition if the filer demonstrates financial stability and experience in providing broadband service.[53] To meet this showing, applicants must show that they have provided broadband Internet access or voice service to at least 1,000 non-Lifeline subscribers.[54] In addition, the applicant must have offered broadband service, without interruption, for the two years prior to the filing date.[55]

Ztar Mobile meets all of the requirements for streamlined LBP ETC designation. Ztar Mobile provided, in sections II (a)-(i), *supra*, all of the information required by section 214(e) of the Act and FCC rules 54.201 and 54.202. Moreover, Ztar Mobile has been providing, without interruption, both voice telecommunications and broadband service to non-Lifeline customers

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[50] *See* 47 C.F.R. § 54.401(e).

[51] *See* Lifeline Modernization Order ¶¶ 277-284; 47 C.F.R. § 54.202(d)(1); Lifeline Broadband Provider Guidance Public Notice ¶ 6.

[52] *See* Lifeline Modernization Order ¶ 284.

[53] *See* Lifeline Modernization Order ¶ 278. *See also* 47 C.F.R. § 54.202(d)(1).

[54] *See id*.

[55] *See id*.

since 2004.[56] Ztar Mobile currently provides services to more than 200,000 non-Lifeline customers throughout the United States. Accordingly, Ztar Mobile meets all of the criteria for streamlined grant of its LBP ETC designation.[57]

III. THE PUBLIC INTEREST WILL BENEFIT FROM GRANTING LBP ETC STATUS TO ZTAR MOBILE

The Commission's rules require that, before granting a request for ETC designation, the Commission must find that grant of the designation would be in the public interest.[58] In determining if the public interest showing has been met, in the context of voice Lifeline service, the Commission considers the "benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering."[59] These considerations should apply equally to an LBP ETC designation public interest showing.

The Commission has described broadband as the "essential communications medium of the digital economy," noting that "[a]ccess to broadband shortens the distance to high-quality education, meaningful employment, and reliable healthcare. It is now the dominant technology used to communicate, educate, inform, and entertain."[60] However, the Commission has

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[56] *See* 47 C.F.R. §§ 54.202(d)(1).

[57] Ztar Mobile's affiliate Free Mobile has also filed a petition for LBP designation. Ztar Mobile is an existing mobile voice and broadband service provider. Free Mobile was incorporated as a new and separate company to essentially serve as the Lifeline arm of Ztar Mobile's retail wireless service. If Free Mobile can rely on Ztar Mobile's existing non-Lifeline subscribers and history of providing mobile broadband for streamlined treatment of the Free Mobile petition, then Ztar will withdraw this petition. If Ztar Mobile must be the ETC to receive streamlined review, then it would license the Free Mobile name and use it as a dba of Ztar Mobile. The owners of Ztar Mobile and Free Mobile do not intend to have both entities designated as LBPs to provide Lifeline service.

[58] *See* 47 C.F.R. § 54.202(b).

[59] *See, e.g., 2010 Virgin Mobile ETC Order*, ¶ 6.

[60] Lifeline Modernization Order ¶ 12.

recognized that a "digital divide" still exists with low-income consumers "adopting broadband at rates well below the rest of the country."[61]

Grant of Ztar Mobile's Petition will enable the Company to provide Lifeline-eligible consumers with convenient and much-needed Internet access at 3G or 4G LTE speeds, thereby helping to bridge the digital divide. In addition, entry of Ztar Mobile to the Lifeline-supported mobile broadband market will result in a source of quality broadband service that may spur other ETCs to offer competitive Lifeline broadband service offerings. Moreover, Ztar Mobile's Lifeline-supported mobile broadband service plan is designed with disadvantaged consumers in mind and, as such, will help the Commission meet core Lifeline program goals, including closing the jobs and homework gaps and increasing competitive pressure to ensure that subscribers get high value for their Lifeline benefits.

Specifically, the Company will offer to low-income consumers a prepaid mobile broadband service, with 500 MB of data, 100 voice minutes and 100 texts at no cost to the consumer, thereby increasing consumer choice and making services more affordable and accessible. The monthly 500 MB of data available in both of Ztar Mobile's non-Tribal plans provides speed and capacity for consumers to utilize the Internet to meet their work, health and school-related needs. When coupled with free Wi-Fi available in community anchor institutions, local businesses and elsewhere, Ztar Mobile's mobile broadband service will enable subscriber access to multiple gigabytes worth of data each month, enabling those consumers to use data-hungry apps and services such as online video courses and real-time video communications just like non-Lifeline consumers.

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[61] *Id*. ¶ 19.

Ztar Mobile's broadband service will enable Lifeline-eligible subscribers to access the Internet for tasks such as researching jobs, communicating with their employer, children's schools or family and friends by email, or completing homework assignments. The mobile nature of the service will be particularly attractive to Lifeline-eligible consumers who will now have immediate and convenient Internet access – at home, on a bus commuting to work or school or during a lunch break at work – thereby eliminating the need to undertake time-consuming or costly travel to a library or other location for public Internet access.

The prepaid aspect of Ztar Mobile's Lifeline-supported mobile broadband service is also an attractive feature for "unbanked" consumers. Moreover, Lifeline-eligible consumers will avoid concerns regarding deposits, hidden costs, varying monthly charges and long term contract issues. Further, Ztar Mobile will not impose credit checks on applicants thereby providing an alternative for those low-income consumers unable to obtain credit for post-paid services provided by traditional carriers.

Ztar Mobile recognizes that Lifeline-eligible consumers are often faced with making difficult choices about how to allocate and spend their limited resources. The ability to meet their Internet access needs while at the same time anticipating and controlling the associated costs is critical. Ztar Mobile's Lifeline-supported mobile broadband service provides consumers with guaranteed broadband capacity each month but the Company also provides consumer-friendly data top-up options, starting at $10.00, that enable subscribers to tailor their broadband services to their variable needs and budgets. This supplemental "top-up" data, will be available for purchase at Ztar Mobile's affiliate, Free Mobile's, website, by telephone or in thousands of retail locations where good2Go Mobile top-ups are available. Accordingly, grant of the Petition is in the public interest.

IV. ANTI-DRUG ABUSE CERTIFICATION

Ztar Mobile certifies that no party to this Petition is subject to a denial of federal benefits that includes Commission benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

V. CONCLUSION

For the foregoing reasons, Ztar Mobile asserts that grant of the instant Petition for Limited Designation as an LBP ETC is in the public interest and is warranted in accordance with section 214(e)(6) of the Act.

Respectfully submitted,

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Counsel to Ztar Mobile, Inc.

Dated: October 3, 2016

DECLARATION

I, Kevin Haddad, President of Ztar Mobile, Inc. do hereby affirm under penalty of perjury that I have reviewed all of the factual assertions set forth in the foregoing petition for ETC status and that all such statements made therein are true and correct to the best of my knowledge, information and belief.

To the best of my knowledge, no party to this Petition, nor any of their officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) as specified in Section 1.2002(b) of the Commission's rules are subject to denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

Executed on October 3, 2016

Kevin Haddad
President
Ztar Mobile, Inc.

Exhibit

Ztar Mobile, Inc.

Lifeline Broadband Provider Requested States (by Zip Code)

Ztar Mobile, Inc. – Lifeline Broadband Provider Service Area Zip Codes

Alabama	35051	35097	35149	35213	35259	35447	35490	35575	35622
35004	35052	35098	35150	35214	35260	35448	35491	35576	35630
35005	35053	35111	35151	35215	35261	35449	35501	35577	35631
35006	35054	35112	35160	35216	35266	35452	35502	35578	35632
35007	35055	35114	35161	35217	35282	35453	35503	35579	35633
35010	35056	35115	35171	35218	35283	35456	35504	35580	35634
35011	35057	35116	35172	35219	35285	35457	35540	35581	35640
35013	35058	35117	35173	35220	35287	35458	35541	35582	35643
35014	35060	35118	35175	35221	35288	35459	35542	35584	35645
35015	35061	35119	35176	35222	35290	35460	35543	35585	35646
35016	35062	35120	35178	35223	35291	35461	35544	35586	35648
35019	35063	35121	35179	35224	35292	35462	35545	35587	35649
35020	35064	35123	35180	35226	35293	35463	35546	35592	35650
35021	35068	35124	35181	35228	35294	35464	35548	35593	35651
35022	35070	35125	35182	35229	35295	35466	35549	35594	35652
35023	35071	35126	35185	35231	35296	35468	35550	35601	35653
35031	35072	35127	35186	35232	35297	35469	35551	35602	35654
35032	35073	35128	35187	35233	35298	35470	35552	35603	35660
35033	35074	35130	35188	35234	35401	35471	35553	35609	35661
35034	35077	35131	35201	35235	35402	35473	35554	35610	35662
35035	35078	35133	35202	35236	35403	35474	35555	35611	35670
35036	35079	35135	35203	35237	35404	35475	35559	35612	35671
35038	35080	35136	35204	35238	35405	35476	35560	35613	35672
35040	35082	35137	35205	35242	35406	35477	35563	35614	35673
35042	35083	35139	35206	35243	35407	35478	35564	35615	35674
35043	35085	35142	35207	35244	35440	35480	35565	35616	35677
35044	35087	35143	35208	35246	35441	35481	35570	35617	35699
35045	35089	35144	35209	35249	35442	35482	35571	35618	35739
35046	35091	35146	35210	35253	35443	35485	35572	35619	35740
35048	35094	35147	35211	35254	35444	35486	35573	35620	35741
35049	35096	35148	35212	35255	35446	35487	35574	35621	35742

35744	35801	35951	36003	36052	36109	36205	36303	36370	36475
35745	35802	35953	36005	36054	36110	36206	36304	36371	36476
35746	35803	35954	36006	36057	36111	36207	36305	36373	36477
35747	35804	35956	36008	36061	36112	36250	36310	36374	36480
35748	35805	35957	36009	36062	36113	36251	36311	36375	36481
35749	35806	35958	36010	36064	36114	36253	36312	36376	36482
35750	35807	35959	36015	36066	36115	36254	36313	36401	36502
35751	35808	35960	36017	36067	36116	36255	36314	36420	36503
35752	35809	35961	36020	36068	36117	36256	36316	36421	36504
35754	35810	35962	36022	36069	36118	36257	36317	36425	36505
35755	35811	35963	36023	36071	36119	36258	36318	36426	36507
35756	35812	35964	36024	36072	36120	36260	36319	36427	36509
35757	35813	35966	36025	36075	36121	36261	36320	36429	36511
35758	35814	35967	36026	36079	36123	36262	36321	36432	36512
35759	35815	35968	36027	36080	36124	36264	36322	36436	36513
35760	35816	35971	36030	36081	36125	36265	36323	36441	36518
35761	35824	35972	36032	36082	36130	36266	36330	36442	36521
35762	35893	35973	36033	36083	36131	36267	36331	36445	36522
35763	35894	35974	36035	36087	36132	36268	36340	36446	36523
35764	35896	35975	36036	36088	36133	36269	36343	36451	36524
35765	35897	35976	36037	36091	36134	36271	36344	36453	36525
35766	35898	35978	36038	36092	36135	36272	36345	36454	36526
35767	35899	35979	36040	36093	36140	36273	36346	36456	36527
35768	35901	35980	36041	36101	36141	36274	36349	36458	36528
35769	35902	35981	36042	36102	36142	36276	36350	36460	36529
35771	35903	35983	36043	36103	36177	36277	36351	36461	36530
35772	35904	35984	36045	36104	36191	36278	36352	36467	36532
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92342	92391	92508	92563	92615	92662	92728	92837	92883	93036
92344	92392	92509	92564	92616	92663	92735	92838	92885	93040
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