

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Carriers Eligible for	)	
Universal Service Support	)	WC Docket No. 09-197
	)	
Petition of SI Wireless, LLC for	)	
Designation as an Eligible	)	
Telecommunications Carrier in the	)	
State of Tennessee	)	

**NOTICE OF RELINQUISHMENT OF ELIGIBLE  
TELECOMMUNICATIONS CARRIER DESIGNATION**

SI Wireless, LLC (the “Company” or “SI Wireless”) hereby notifies the Commission that it is relinquishing its designation as an Eligible Telecommunications Carrier (“ETC”) in Tennessee pursuant to Section 214(e)(4) of the Telecommunications Act of 1934, as amended (“Act”), 47 U.S.C. § 214(e)(4), Part 54 of Commission’s rules. The impact of this relinquishment will be minimal because SI Wireless currently provides service to a limited number of subscribers, and those consumers have options for alternative service providers in Tennessee and will have ample time to transition service to another provider. The effective date of the relinquishment will be January 6, 2020.

**I. REQUEST TO RELINQUISH ETC DESIGNATION**

SI Wireless is a facilities-based provider of mobile wireless service. SI Wireless was designated as an ETC by the Commission in 2014 for purposes of receiving high-cost and low-

income program support from the federal Universal Service Fund.<sup>1</sup> To date, however, SI Wireless has not received high-cost support and has solely received support from the Lifeline program.

Federal law specifies that the Commission “shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier.”<sup>2</sup> The federal requirements for relinquishment of ETC designation can be summarized as the following: (1) there must be more than one ETC serving in the area of the ETC seeking relinquishment; (2) the ETC seeking relinquishment must provide advance notice to the relevant public service commission; (3) the subscribers served by the relinquishing ETC must continue to be served by an ETC; and (4) to the extent that additional facilities are required to serve any of the relinquishing ETC’s customers, sufficient notice shall be provided to ensure that the construction or purchase can be timely completed. As detailed below, SI Wireless’ request complies with each of these requirements.

**A. Other ETCs Serve SI Wireless’ ETC Service Area**

SI Wireless’ ETC service area is served by more than one ETC, including multiple wireless ETCs. Because at least one other ETC serves SI Wireless’ ETC service area, federal law provides that the Commission should permit SI Wireless to relinquish its ETC designation.

**B. SI Wireless Is Providing Advance Notice to the Commission**

Consistent with 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a), SI Wireless is filing this notice more than a month in advance of the requested effective date of relinquishment of its ETC designation.

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<sup>1</sup> *SI Wireless, LLC*, 29 FCC Rcd 14393 (WCB 2014). SI Wireless’s ETC service area is made up of the ILEC wire centers listed in Appendix A.

<sup>2</sup> 47 U.S.C. § 214(e)(4).

**C. The Remaining ETCs Will Serve Consumers**

To the best of SI Wireless' knowledge, SI Wireless' Lifeline subscribers will have at least one alternative ETC from which to choose. Thus, all low-income consumers residing in SI Wireless' ETC service area will continue to be served by an ETC consistent with 47 U.S.C. §214(e).

**D. No Additional Facilities Must Be Purchased or Constructed by the Remaining ETCs**

To the best of SI Wireless' knowledge, none of the remaining ETCs will be required to purchase or construct additional facilities to continue to serve consumers within the applicable service area.

**II. PUBLIC INTEREST CONSIDERATIONS**

SI Wireless' proposed ETC relinquishment is consistent with the public interest. The services offered by SI Wireless are available from other wireline and wireless providers in the Commonwealth, including TracFone Wireless, Assurance Wireless, and the incumbent LECs serving SI Wireless' ETC area. Consequently, SI Wireless' subscribers will not be unduly harmed as they will be able to transition to new providers and continue to receive Lifeline discounts.

No later than November 7, 2019, SI Wireless will send notice via U.S. mail to affected customers (see Appendix B), notifying them that SI Wireless will cease providing the services they currently receive, effective January 6, 2020.<sup>3</sup> This will give Lifeline customers sixty (60) days' notice, which matches or exceeds the amount of notice provided by other carriers that have

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<sup>3</sup> According to USAC data, SI Wireless had 2,049 Lifeline customers in Tennessee as of July 2019.

relinquished their ETC designations.<sup>4</sup> SI Wireless will follow up at least once with a text-message reminder to remaining customers during the 60-day notice period. This will provide the subscribers ample time to find a new service provider in a thoughtful and informed manner.


The notice will clearly indicate that the subscriber must make arrangements with another carrier to avoid loss of service and provides a toll-free telephone number that customers may call to reach SI Wireless' customer service representatives for assistance with this transition.

Consistent with other recent ETC relinquishments approved by the Commission,<sup>5</sup> SI Wireless will largely<sup>6</sup> cease to enroll new Lifeline subscribers on the date its notifications to Lifeline subscribers are sent.


### III. CONCLUSION

Wherefore, SI Wireless respectfully requests that the Commission issue an order approving the relinquishment of SI Wireless' ETC designation in Tennessee effective January 6, 2020.

Respectfully submitted,



Jason Narrell  
Chief Financial Officer  
SI Wireless, LLC d/b/a MobileNation



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November 5, 2019

<sup>4</sup> See, e.g., *T-Mobile USA, Inc.*, 29 FCC Rcd 14368 (WCB 2014) (approving relinquishment petition committing to provide 45 days' notice to Lifeline customers).

<sup>5</sup> See, e.g., *AT&T Mobility, LLC*, 29 FCC Rcd 14366 (WCB 2014); *Verizon Wireless*, 27 FCC Rcd 14215 (WCB 2012). Both orders approved relinquishment notices stating that the ETC was ceasing to enroll new Lifeline subscribers as of the day of filing.

<sup>6</sup> SI Wireless may continue to process enrollments in some cases but reserves the right not to conduct any new enrollments going forward.

# APPENDIX A

## APPENDIX A

### Wire Centers Within SI Wireless ETC Service Area

#### Rural Wire Centers

<u>Company</u>	<u>Wire Center</u>
ARDMORE TELEPHONE CO., INC.	ARMRALXA
ARDMORE TELEPHONE CO., INC.	MCBGTNXA
ARDMORE TELEPHONE CO., INC.	MNHLTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	BCGVTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	BRSHNTXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	CNTWTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	DBRLTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	DOYLTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	DRSTTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	HLBOTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	LAGRTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	MMRLTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	MTEGTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	OLZITNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	PLHMTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	RCISTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	SPNCTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	SPRLTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	TRCYTNXA
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.	VIOLTNXA
BLEDSON TELEPHONE COOPERATIVE	CLSTTNXA
BLEDSON TELEPHONE COOPERATIVE	DNLPTNXA
BLEDSON TELEPHONE COOPERATIVE	FCFLT NXA
BLEDSON TELEPHONE COOPERATIVE	NNMLTNXA
BLEDSON TELEPHONE COOPERATIVE	PKVLT NXA
CENTURYTEL OF ADAMSVILLE, INC.	ADVLT NXA
CENTURYTEL OF ADAMSVILLE, INC.	MDVLT NXA
CENTURYTEL OF ADAMSVILLE, INC.	SHLHTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	ALGDTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	CKVLT NXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	CSVLT NXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	DRSDTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	LTHMTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	MARTTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	MMVLT NXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	MTRYTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	PLHLTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	PLVLT NXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	SHRNTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	SIDNTNXA

CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	SPRTTNXA
CITIZENS COMM CO TN DBA FRONTIER COMM OF TN, LLC	TANSTNXA
CROCKETT TELEPHONE CO., INC.	ALAMTNXA
CROCKETT TELEPHONE CO., INC.	FRSHTNXA
CROCKETT TELEPHONE CO., INC.	MRCYTNXA
DEKALB TELEPHONE COOPERATIVE	SMVLTNXA
HUMPHREYS COUNTY TELEPHONE CO.	NWJHTNXA
LORETTO TELEPHONE CO., INC.	ETRGTNXA
LORETTO TELEPHONE CO., INC.	FVPLTNXA
LORETTO TELEPHONE CO., INC.	LEOMTNXA
LORETTO TELEPHONE CO., INC.	LRTTTNXA
LORETTO TELEPHONE CO., INC.	STJSTNXA
PEOPLES TELEPHONE CO., INC.	ERINTNXA
PEOPLES TELEPHONE CO., INC.	HNRYTNXA
PEOPLES TELEPHONE CO., INC.	TNRGTNXA
TENNESSEE TELEPHONE CO.	BCTNTNXA
TENNESSEE TELEPHONE CO.	CFTNTNXA
TENNESSEE TELEPHONE CO.	CNWDTNXA
TENNESSEE TELEPHONE CO.	COVLTNXA
TENNESSEE TELEPHONE CO.	DCVLTNXA
TENNESSEE TELEPHONE CO.	HCRDTNXA
TENNESSEE TELEPHONE CO.	LBVLTNXA
TENNESSEE TELEPHONE CO.	LNDNTNXA
TENNESSEE TELEPHONE CO.	LVRGTNXA
TENNESSEE TELEPHONE CO.	MTJLTNXA
TENNESSEE TELEPHONE CO.	PRSSTNXA
TENNESSEE TELEPHONE CO.	SCHLTNXA
TENNESSEE TELEPHONE CO.	SRDSTNXA
TENNESSEE TELEPHONE CO.	WYBOTNXA
UNITED TEL CO INC.	CPHLTNXA
UNITED TEL CO INC.	ESSPTNXA
UNITED TEL CO INC.	NLVLTNXA
UNITED TEL CO INC.	UNVLTNXA
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	CTGVTNXA
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	CYPRTNXA
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	PRYRTNXA
WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	HAZLKYXA
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE, INC.	BRZLTNXA
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE, INC.	MSHLTNXA
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE, INC.	TRMBTNXA
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE, INC.	YRVLTNXA
WEST TENNESSEE TELEPHONE CO., INC.	ATWDTNXA
WEST TENNESSEE TELEPHONE CO., INC.	BRFRTNXA
WEST TENNESSEE TELEPHONE CO., INC.	RTFRTNXA
WEST TENNESSEE TELEPHONE CO., INC.	TRZVTNXA

**Non-Rural Wire Centers**

BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BGSNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLLSTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLNCTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLVRTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BTSPTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHRLTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHTGTNSM
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLVLTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CMCYTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CMDNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CNHMTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CNVLTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRNTMSMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DKSNTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DOVRTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DYBGTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DYERTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DYTNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FLTNKYMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FLVLTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRDNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FYVLTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GBSNTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GDJTNNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GLSNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GNFDTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HHNWTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HMBLTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HMPSTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HNLDTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HNSNTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HNTGTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HRNBTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JCSNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JCSNTNNS
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JSPRTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KNTNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LRBGTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LWBGTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LXTNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYBGTNMT
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYLSTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LYVLTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCKNTNMA
BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCWNTNMT





# APPENDIX B

11/7/2019

Name  
Address  
City, St Zip

Thank you for being a loyal MobileNation Member. Unfortunately, MobileNation will be closing our network and we will no longer provide any Cellular Service in 2020. This also means we will no longer provide Lifeline Benefits in Tennessee, as of 1/6/2020.

How does this impact you? If you would like to keep a Lifeline discount you will need to contact a Lifeline provider in your area. Here is a list of providers that may offer a Lifeline discount in your State – you can contact the providers directly to find which ones provide service in your area.

- Access Wireless
- Safelink Wireless
- Assurance Wireless
- AT&T
- TEC\_Alamo Division
- Aeneas Internet and Telephone
- TDS Telecom/Tennessee Telephone Company
- Loretto Telephone Company

Or you can go to <https://www.lifelinesupport.org/ls/> to find a list of Lifeline providers in the city/town near you. You can also contact the Universal Service Administrative Company (USAC) at LifelineProgram@usac.org or 800.234.9473 for a list of Lifeline providers in your state or to ask general questions about Lifeline.

If you would like to port your MobileNation phone number to another provider, you have until 1/6/20 to complete the request. If you have any questions, please call us at 877.732.2147 to speak with someone from Member Support or check with your local MobileNation store.

Sincerely,

MobileNation Lifeline Support