KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

NEW YORK, NY
LOS ANGELES, CA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

FACSIMILE
(202) 342-8451
www.kelleydrye.com

DIRECT LINE: (202) 342-8544
EMAIL: jheitmann@kelleydrye.com

February 19, 2015

VIA ECFS

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

Re: Assurance Home Phone Services, Inc. dba Surety Wireless; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On April 6, 2012, Assurance Home Phone Services, Inc. dba Surety Wireless ("Surety") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.[1]

Due to the passage of time, Surety has comprehensively revised its Compliance Plan. Surety hereby re-submits its complete Compliance Plan with significant revisions.

[1] *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).

This letter and revised Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,

John J. Heitmann
Joshua T. Guyan

Counsel to Assurance Home Phone Services, Inc.

cc: Ryan Palmer
Jonathan Lechter

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
Assurance Home Phone Services, Inc.	

ASSURANCE HOME PHONE SERVICES, INC. COMPLIANCE PLAN

Assurance Home Phone Services, Inc. dba Surety Wireless ("Surety" or the "Company"),[1] through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.[2]

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[1] The Company hereby also reports its corporate trade names, identifiers, and its holding company, operating companies and affiliates as: Surety Wireless (dba). For its wireline operations, the Company operates under the name Assurance Home Phone Services, Inc., and for its wireless operations the Company operates under Assurance Home Phone Services, Inc. dba Surety Wireless and identifies itself as Surety Wireless on its marketing materials. Surety uses the Surety Wireless dba to provide wireless service in Arkansas, Maryland and Missouri. Surety is affiliated through common ownership with several eligible telecommunications carriers ("ETCs"): Absolute Home Phones, Inc. dba Absolute Mobile; Absolute Mobile, Inc.; Easy Telephone Services Company dba Easy Wireless; and Safari Communications, Inc. Absolute Mobile is a wireless ETC designated in Nevada, Arkansas and Puerto Rico. Easy is designated as an ETC in Arkansas, Missouri, Kentucky and Oklahoma. Safari Communications was a wireless ETC designated in Maryland, but the ETC is withdrawing its compliance plan and exiting the Lifeline business. Safari Communications surrendered its ETC designation as of November 2014. Surety is also affiliated through common ownership with a Mobile Virtual Network Enabler ("MVNE"), Telecom Service Bureau, Inc. ("TSB"), which is not an ETC. Surety's other non-ETC affiliates are G5 Real Estate Holdings, LLC; High Tech Communications, Inc.; Mobile Management, Inc.; Pay It Forward Consulting, LLC and BreakOut Wireless, LLC.

[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*

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Surety will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier ("ETC") in the Lifeline program.[3]

Surety will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission's Lifeline rules and policies more generally.[4] This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that Surety will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for

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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) ("*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).

3 *See Lifeline Reform Order*, ¶ 368. Although Surety 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. Surety 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 Surety provides service using its own facilities for purposes of a state universal service program.

4 In addition, this Compliance Plan is comparable to the compliance plans approved by the Bureau, including two of the most recently approved compliance plans. *See* Telrite Corporation Compliance Plan, WC Docket Nos. 09-197, 11-42 (Dec. 19, 2012) and Blue Jay Wireless, LLC Compliance Plan, WC Docket Nos. 09-197, 11-42 (Dec. 19, 2012). The Telrite and Blue Jay Wireless compliance plans were approved on December 26, 2012. *See* Public Notice, DA 12-2063.

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 the Company offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

ACCESS TO 911 AND E911 SERVICES[5]

Pursuant to the *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 Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.[6] Surety complied with these conditions before the effective date of the *Lifeline Reform Order*.

Surety will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available using the Company's wireless service from Surety handsets, even if the account associated with the handset has no minutes remaining.

The Company's existing practices currently provide access to 911 and E911 services for all customers. The Company meets these obligations using Telecom Service Bureau, Inc. ("TSB") as its underlying network provider/carrier, which resells the wireless services of Sprint. Sprint routes 911 calls from the Company's customers in the same manner as 911 calls from

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5 *See* Compliance Plan Public Notice at 3.

6 *See Lifeline Reform Order*, ¶ 373.

Sprint's own retail customers. To the extent that Sprint is certified in a given PSAP territory, this 911 capability will function the same for the Company. The Company 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. Finally, the Company 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. Surety will ensure that all handsets used in connection with its wireless Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. Surety uses phones from TSB and Sprint that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing 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 the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE[7]

A. Policy

Surety complies with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

[7] *See* Compliance Plan Public Notice at 3.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135%[8] 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(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, Surety will confirm 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.

B. Eligibility Determination

Most of Surety's customer enrollment is done in-person, as opposed to over the phone or the Internet. Surety holds planned events at tent locations and other advertised locations. In addition, employees or agents ("Company personnel") may set up in specific neighborhoods at public areas where eligible customers are likely to be located. All enrollments are done electronically in real-time using the CGM, LLC ("CGM") enrollment application. Company personnel views each potential customer's government-issued photo identification[9] and proof of eligibility to participate in the Lifeline program. The Company's agent then logs into CGM's enrollment application using a unique agent ID and password to enroll the customer using the process outlined in this Compliance Plan. The CGM enrollment application captures a potential customer's identification and photo of proof of eligibility. The customer checks off each certification and signs the application form electronically. The information collected from the customer is entered into the Melissa Database to validate the address and is checked against a

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[8] 150% in some states where applicable.

[9] It is Surety's current policy to view government-issued photo identification, however, that is not a requirement of the FCC's Lifeline rules and the National Lifeline Accountability Database ("NLAD") includes a Third Party Identity Verification component that serves the identity verification purposes. Therefore, Surety reserves the right to modify its policy with respect to identity verification.

CGM-run database of all TSB-managed companies to guard against duplicate enrollments, in addition to the NLAD. A Quality Control employee will then access the app, using CGM's "Real Time Review" to approve the potential customer. To complete the order, the customer must activate the phone and service. An electronic Lifeline application form is also attached to the account.

When the completed order is approved, the agent provides a handset to the customer and assists the customer to activate the phone. The customer must dial 611 and press 1 to activate. The customer will then be required to enter the last four digits of his or her SSN. To activate the phone successfully, the SSN provided over the phone must match the last four digits that the customer provided at enrollment. The agent then assists the customer to make a test call using the handset. Customers are given a Frequently Asked Questions document that lists the Company's name, contact number and customer service information and describes how customers can check their account balance and purchase "top up" minutes. In addition, Surety uses its compliance partner CGM to perform a "back-end" duplicate screen across TSB clients prior to seeking reimbursement from the federal USF fund ("Fund") to guard against customer overlap. This check includes screening to ensure that Surety has no duplicate customers with its affiliated ETCs or non-affiliated TSB clients.

For enrollments conducted over the phone and online, customers will be required to submit copies of their government-issued photo identification and proof of eligibility to the Company by regular mail, fax or electronic mail (scanned version) before the applicant will be enrolled.

As discussed in further detail in Section I.F. below, all Company personnel that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in

the *Lifeline Reform Order* 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, including a compliance manual.

If Surety cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.[10] 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 and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.[11] Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal 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 evidencing the consumer's participation in a qualifying state, federal or Tribal program.[12]

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[10] *See Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

[11] *See Lifeline Reform Order*, ¶ 101. *See also* USAC Guidance available at http://www.usac.org/li/telecom-carriers/step06/default.aspx.

[12] *Id*. and section 54.410(c)(1)(i)(B).

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.[13] 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.[14]

For those potential customers that register for Lifeline service in person, Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.[15] In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Company will not retain a copy of this documentation, except where state laws or rules require such retention.[16] Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Surety will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter

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13 *See Lifeline Reform Order*, ¶101; section 54.410(b)(1)(i)(B).

14 *See id*.

15 *See Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

16 *See Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

will be escalated to supervisory personnel. In addition, there will be a secondary check by someone that is not compensated on a commission basis for enrollments to oversee and finalize every Lifeline enrollment prior to activating the Lifeline service[17] and including that customer on an FCC Form 497 for reimbursement.

Further, Surety will not enroll customers at retail locations where Surety does not have an agency agreement with the retailer. Surety will require an agent retailer to have any employees involved in the enrollment process go through the standard Surety training process, same as it would for any other agent. By establishing agency relationships with all of its Company personnel, including future retail outlets, Surety meets the "deal directly" requirement adopted in the TracFone Forbearance Order.[18]

The Commission determined in the *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.'"[19] Because Surety is responsible for the actions of all of its employees and agents including those enrolling customers in any owned or affiliated retail locations, and Surety will conduct a secondary review by someone that is not compensated on a commission basis to oversee and finalize every Lifeline enrollment prior to Lifeline service activation and including that customer on an FCC Form 497 for reimbursement, the Company will always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

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17 *See Lifeline and Link Up Modernization and Reform*, WC Docket No. 11-42, Order, DA 13-1441 (June 25, 2013) (revising Section 54.410(a) of the Commission's rules).

18 *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).

19 *Lifeline Reform Order*, ¶ 110.

De-Enrollment for Ineligibility. If Surety has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.[20] 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. 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 five business days. Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Surety customers can call customer service by dialing 611 from their Surety handset and no minutes will be used or decremented for the call. Customers can also call (855) 574-2034 from any phone to reach customer service. Live customer service operators can be reached between 8:00am and 6:00pm Monday through Friday, and between 9:00am and 6:00pm Saturday and Sunday (all times Eastern Standard Time).

C. Subscriber Certifications for Enrollment

Surety will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.[21] The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the

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[20] *See Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

[21] *Lifeline Reform Order*, ¶ 61; section 54.410(a).

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.[22] Applicants that seek to enroll based on income eligibility will be provided with the Federal Poverty Guidelines by household size as part of the enrollment process. Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile or electronic mail. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.[23]

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 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.[24]

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22 *See* Model Application/Certification Forms, included as Exhibit A. *See* Compliance Plan Public Notice at 3.

23 *See Lifeline Reform Order*, ¶ 123.

24 *See id*., ¶ 121; section 54.410(d)(1).

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.[25]

In addition, Surety will notify applicants for its prepaid services that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.[26]

Information Collection. The Company will also 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 sufficient[27]); (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.[28]

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or

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25 *See* section 54.405(c).

26 *See Lifeline Reform Order*, ¶ 257.

27 *See id.*, ¶ 87.

28 *See* section 54.410(d)(2).

interactive voice response recording,[29] 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 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 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) 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; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) 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 the Company 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. The applicant must also authorize the

[29] *See Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

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.[30]

D. Annual Re-Certification Procedures

Surety will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and section 54.410(d) of the Commission's rules. This certification will include 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.[31] Further, the re-certification materials will 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.[32]

Surety will de-enroll subscribers that do not respond to the annual re-certification notice or fail to provide the required certification.[33] The Company will send a single written notice explaining that failure to respond to the re-certification request within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the 30 days, the Company will de-enroll the subscriber within five business days.

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30 *See* Section 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 id*.

31 *See Lifeline Reform Order*, ¶ 120.

32 *See id*., ¶ 145.

33 *See Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

E. Activation and Non-Usage

Surety will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service via Surety's website or by calling the Company's call center.[34] For activation of a handset provided to a new customer "in the field," successful applicants are provided a functioning handset and instructed to dial Surety's customer service number to complete the activation process. Such calls are free of charge to the applicant. To activate a handset provided to a successful applicant by mail, upon receipt of the handset, the applicant must contact Surety's customer service department and then press 1 to activate the service. Specifically, the customer must call 611, confirming the last 4 digits of their SSN, which must match the SSN provided when the customer first enrolled. The customer then makes and receives a test call by calling 561-232-3006 to ensure the phone works before they leave the enrollment location.

In addition, for any customers from whom Surety does not both bill and collect a monthly charge, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days.[35] After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.[36] Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an

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[34] *See Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

[35] Surety will apply the 60-day non-usage rule to those customers that receive bills from Surety, but have not paid the bill.

[36] *See Lifeline Reform Order*, ¶ 257; section 54.405(e)(3). Surety's current practice is to send a notice to subscribers after 30 days of non-usage giving subscribers 30 days to use the service or they will be de-enrolled.

incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.[37]

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and Surety will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[38]

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, the Company has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the NLAD, Company personnel will 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 Company personnel interacting with existing and potential Lifeline customers undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan.

Further, Surety has taken a proactive approach to eliminating fraud amongst its agents and representatives. Surety's agents are tracked by GPS so Surety can track whether they are attending sales events when they submit new customers for enrollment electronically. Surety

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[37] *See Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

[38] *See Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

conducts quality control "shopping" at its events whereby an Surety representative will pose as a Lifeline customer and attempt to enroll in the Lifeline service without being eligible (e.g., without proof of eligibility or by stating that the person has Lifeline service already from another provider).

Database. Surety will comply with the requirements of rule section 54.404 and will use the NLAD for all enrollments. In all states that have not opted out, the Company will query the NLAD 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.[39]

One-Per-Household. Surety will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household[40] through the use of its application and certification forms discussed above, 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.[41] If so, and the applicant lives at

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39 *See Lifeline Reform Order*, ¶ 203. The Company will also transmit to the NLAD the information required for each new and existing Lifeline subscriber. *See Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, the Company will update each subscriber's information in the NLAD within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. *See* section 54.404(b)(8),(10).

40 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 "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 Lifeline Reform Order*, ¶ 74; section 54.400(h).

41 *See Lifeline Reform Order*, ¶ 78.

an address with multiple households, the Company will require the applicant to complete and submit a written USAC document 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).[42]

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline.

Marketing Materials. Surety 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 documentation is necessary for enrollment; and (7) Assurance Home Phone Services, Inc. name (the ETC).[43] These statements will be 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 forms and

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42 *Id*. The USAC worksheet is available at http://www.usac.org/li/tools/news/default.aspx#582.

43 *See Lifeline Reform Order*, ¶ 275; section 54.405(c).

certification forms.[44] This specifically includes the Company's website (www.mysuretywireless.com) and outdoor signage.[45] A sample of the Company's marketing materials is included as Exhibit B. Further, the Company's application/certification form 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 the Company does not seek reimbursement from the Fund without a subscriber's consent, Surety will certify, 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.[46]

In addition, the Company will keep accurate records as directed by USAC[47] and as required by new section 54.417 of the Commission's rules. For example, Surety will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that Surety queried the duplicates database; 2) date and information that Surety transmitted to the duplicates database; 3) date of transmission of updated customer information to database; 4) date and database upon which the ETC determined income-based eligibility where available; 5) date and documentation/data source used to determine income-based eligibility if no database was available to determine subscriber eligibility;[48] 6)

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44 *Id*.

45 *Id*.

46 *See Lifeline Reform Order*, ¶ 128; section 54.407(d).

47 *See* section 54.407(e).

48 Such documentation includes the documentation listed in Section I.B. *supra*.

date, database, and program on which ETC determined subscriber eligibility; 7) date and records detailing the documentation a subscriber provided to demonstrate Lifeline eligibility; 8) state Lifeline administrator documentation of customer eligibility, and subscriber's certification of eligibility; 9) date of customer service activation; 10) application/certification and annual re-certification forms for each subscriber associated with a date and time of signature; and 11) date of transmission of customer de-enrollment to database.

H. Annual Company Certifications

Surety will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;[49] (2) is in compliance with all federal Lifeline certification procedures;[50] and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.[51]

In addition, the Company will provide the results of its annual re-certifications/ verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).[52] Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[53]

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49 *See Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

50 *See Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

51 *See* section 54.416(a)(3).

52 *See Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

53 *See Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,[54] the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.[55] Surety will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.[56] Finally, if Surety is designated as an ETC in the federal jurisdiction states, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.[57]

I. Cooperation with State and Federal Regulators

Surety has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

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54 *See* section 54.422(c).

55 *See Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

56 *See Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

57 *See Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe[58] is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

II. Description of Lifeline Service Offerings[59]

Surety will offer its Lifeline service in the states where it is designated as an ETC[60] and throughout the coverage area of its underlying provider, Sprint. The Company's wireless Lifeline offering in Arkansas, Maryland, and Missouri will provide customers with an option of 100 or 250 anytime prepaid minutes per month at no charge. The minutes for the 100 minute plan are automatically rolled over for 90 days. The minutes for the 250 minute plan do not roll over. Three texts equals one minute for these plans.

Lifeline customers can purchase additional bundles of minutes in denominations of 100 minutes ($5.00), 225 minutes ($10.00), 500 minutes ($20.00) or unlimited minutes ($30.00). Subscribers with data capable handsets can also purchase data in denominations of 128 MB ($5.00), 256 MB ($10.00), 512 MB ($20.00) or 1 GB ($30.00). "Top-Up" minutes and data expire 30 days from the date of purchase. Airtime "top-up" minutes and data are available for purchase over the phone and on the Company's website. Additional information regarding the Company's plans, rates and services can be found on its website (www.mysuretywireless.com). In addition to free voice services, the Company's Lifeline plans will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting and Voicemail. All 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.

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58 *See* section 54.405(e)(1).

59 *See* Compliance Plan Public Notice at 3.

60 The Company is designated as a wireless ETC in Arkansas, Maryland, and Missouri.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation[61]

Financial and Technical Capabilities. Commission rule 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.[62] The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. 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.

Surety is owned in its entirety by Joseph Fernandez. Surety was formed in 2009 and began offering wireless services in 2011. Mr. Fernandez has acquired a controlling interest in several wireless ETCs: Absolute Home Phones, Inc. dba Absolute Mobile; Absolute Mobile, Inc.; Easy Home Phone Services, Inc. dba Easy Wireless; and Safari Communications, Inc. Absolute Mobile is a wireless ETC designated in Arkansas, Nevada, and Puerto Rico. Easy Wireless is a wireless ETC designated in Arkansas, Kentucky, Missouri, and Oklahoma. Safari Communications was a wireless ETC designated in Maryland, but the ETC is withdrawing its compliance plan and exiting the Lifeline business. Safari Communications surrendered its ETC designation as of November 2014. While Surety and its ETC affiliates do have some overlap in state ETC authority (Easy, Absolute Mobile and Surety Wireless are ETCs in Arkansas and both

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61 *See* Compliance Plan Public Notice at 3.

62 *See Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Easy and Surety are ETCs in Missouri), the companies have been and will continue to use CGM to screen for duplicate enrollments, in addition to utilizing the NLAD.

Surety is also affiliated through common ownership with TSB, which is an MVNE and not an ETC. Surety's other non-ETC affiliates are G5 Real Estate Holdings, LLC; High Tech Communications, Inc.; Mobile Management, Inc.; Pay It Forward Consulting, LLC and BreakOut Wireless, LLC.[63]

Surety has not and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. As discussed in Section II *supra*, the Company provides Lifeline and non-Lifeline wireless services, including top-up minutes and data services. Surety receives revenues from these services and also has access to capital from its investors. Surety's owner also owns TSB, a substantial MVNE that provides wholesale wireless minutes to ETCs and non-ETC MVNOs, and back office and management services to Lifeline ETCs and non-Lifeline MVNOs. Surety has not been subject to enforcement sanctions related to the Low-Income Fund or ETC revocation proceedings in any state.

Service Requirements Applicable to 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."[64] Surety certifies that it will comply with the service requirements applicable to the support the Company receives.[65] The Company provides all of the telecommunications 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. Surety's services include voice telephony services that provide voice grade access to the public

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63 Breakout Wireless was formerly known as Woot Wireless, LLC.

64 Compliance Plan Public Notice at 3.

65 47 C.F.R. § 54.202(a)(1).

switched network or its functional equivalent. Further, the Company's wireless service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that can be used for domestic calls.

Surety 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-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS") for its wireless service offering. Surety, like most wireless carriers, does not differentiate domestic long distance usage from local usage. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.[66]

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[66] *See Lifeline Reform Order*, ¶ 230.

IV. Conclusion

Surety submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,

John J. Heitmann
Joshua T. Guyan
Kelley Drye & Warren, LLP
3050 K Street, NW
Suite 400
Washington, D.C. 20007
(202) 342-8544

Counsel to Assurance Telephone Services, Inc.

February 19, 2015

Exhibit A

Wireless Lifeline Service Application and Certification

Return With Proof

AR

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Surety Wireless' (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. 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. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

❑ **By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

Customer Application Information:

First Name Middle Initial	Last Name	Date of Birth (MM/DD/YY)
		/ /

Residential Address w/ street name & Apt Number **(PO Box cannot be accepted)**	**City / State / Zip Code**
Billing Address (if different from Residential Address) **(P.O. Box IS sufficient)**	**City / State / Zip Code**

❑ Residential Address is **Permanent** **(Must Choose One)**
❑ Residential Address is **Temporary**

❑ Service Is New (Choose One)
❑ Service Is Conversion

Last 4 Social Security Number or Full Tribal Number	Home Telephone / Contact Number	Email Address
- -	( ) -	

Would you like to receive texts or emails from our company about new service offerings or promotions?

❑ **Yes** ☐ **No** This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ **YES** ☐ **NO**

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

❑ Supplemental Nutrition Assistance Program (SNAP)
❑ Federal Public Housing Assistance Section 8 (FPHA)
❑ Medicaid (not Medicare)
❑ Supplemental Security Income (SSI)
❑ Temporary Assistance for Needy Families (TANF)
❑ Low Income Home Energy Assistance Program (LIHEAP)
❑ Income at or below 135% of Federal Poverty Guideline
❑ Bureau of Indian Affairs (BIA) General Assistance
❑ Tribally Administered TANF (TATNF)
❑ Food Distribution Program on Indian Reservations (FDPIR)
❑ Head Start (income-eligible only) (Tribal)
❑ National School Lunch Program's free lunch programs

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)

1	2	3	4	5	6	7	8	Each add'l person
$15,889	$21,505	$27,121	$32,737	$38,353	$43,969	$49,585	$55,201	+ $5,616/person

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

❑ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

❑ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing and address:

- ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

- ☐ **I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.**

Authorizations:

- ☐ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ☐ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ☐ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ☐ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ☐ The address listed below is my primary residence, not a second home or business
- ☐ If I move to a new address, I will provide that new address to the Company within 30 days
- ☐ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ☐ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ☐ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ☐ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:	**Date:**

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ 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.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: _____/_____/_____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meet income qualifying standards) (Tribal)

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
- ☐ Prior year's statement of benefits (Last 4 Digits _____)
- ☐ Notice letter of participation (Last 4 Digits _____)
- ☐ Other official document evidencing participation:

Type: _____ Last 4 Digits _____

Wireless Lifeline Service Application and Certification

Return With Proof

MD

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Surety Wireless' (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. 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. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

❑ **By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

Customer Application Information:

First Name Middle Initial	Last Name	Date of Birth (MM/DD/YY)
		/ /

Residential Address w/ street name & Apt Number **(PO Box cannot be accepted)**	**City / State / Zip Code**
Billing Address (if different from Residential Address) **(P.O. Box IS sufficient)**	**City / State / Zip Code**

❑ Residential Address is **Permanent** **(Must Choose One)**
❑ Residential Address is **Temporary**

❑ Service Is New (Choose One)
❑ Service Is Conversion

Last 4 Social Security Number or Full Tribal Number	Home Telephone / Contact Number	Email Address
- -	( ) -	

Would you like to receive texts or emails from our company about new service offerings or promotions?

❑ **Yes** ☐ **No** This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ **YES** ☐ **NO**

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- ❑ Supplemental Nutrition Assistance Program (SNAP)
- ❑ Federal Public Housing Assistance Section 8 (FPHA)
- ❑ Medicaid (not Medicare)
- ❑ Supplemental Security Income (SSI)
- ❑ Temporary Assistance for Needy Families (TANF)
- ❑ Low Income Home Energy Assistance Program (LIHEAP)
- ❑ Temporary Disability Assistance Program (TDAP)
- ❑ Electrical Universal Service Program (EUSP)
- ❑ Public Assistance to Adults (PAA)
- ❑ Income at or below 135% of Federal Poverty Guideline
- ❑ Bureau of Indian Affairs (BIA) General Assistance
- ❑ Tribally Administered TANF (TATNF)
- ❑ Food Distribution Program on Indian Reservations (FDPIR)
- ❑ Head Start (income-eligible only) (Tribal)
- ❑ National School Lunch Program's free lunch programs
- ❑ Temporary Cash Assistance (TCA)
- ❑ Medical Assistance (MA)
- ❑ Maryland Energy Assistance Program (MEAP)

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)								
1	2	3	4	5	6	7	8	Each add'l person
$15,889	$21,505	$27,121	$32,737	$38,353	$43,969	$49,585	$55,201	+ $5,616/person

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

❑ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

Tribal eligibility:

❑ I hereby certify that I reside on Federally-recognized Tribal lands.

The Eligible Telecommunications Subscriber is **Assurance Home Phone Services, Inc. dba Surety Wireless**
PO Box 831478 Ocala, FL 34483 Customer Service: 866-379-7211 Fax: 877-433-2161

Multiple households sharing and address:

- ❑ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

- ❑ **I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.**

Authorizations:

- ❑ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ❑ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ❑ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ❑ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ❑ The address listed below is my primary residence, not a second home or business
- ❑ If I move to a new address, I will provide that new address to the Company within 30 days
- ❑ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ❑ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ❑ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ❑ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature: | **Date:**

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ 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.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: _____/_____/_____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meet income qualifying standards) (Tribal)

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
- ☐ Prior year's statement of benefits (Last 4 Digits _____)
- ☐ Notice letter of participation (Last 4 Digits _____)
- ☐ Other official document evidencing participation:

Type: _____ Last 4 Digits _____

Assurance Home Phone Services, Inc. d/b/a Surety Wireless
Missouri Application for the Lifeline Program

Consumers meeting certain eligibility criteria are able to participate in the Lifeline program and receive discounted voice telephony service. Lifeline service offers a monthly discount of $9.25 or a monthly usage allotment of 100 minutes with no monthly fee. To apply complete this form and also submit **proof of eligibility**.

Eligibility Criteria for the Lifeline Program
___ MO HealthNet (f/k/a Medicaid) ___ Supplemental Nutrition Assistance (Food Stamps) ___ Supplemental Security Income ___ Low-Income Home Energy Assistance (LIHEAP) ___ Federal Public Housing Assistance (Section 8) ___ National School Free Lunch Program ___ Temporary Assistance for Needy Families (TANF) ___ 135% of the Federal Poverty Level *(See next page for income threshold requirements)*

Applicant's Full Name :	**Birth Date:**	**Social Security #** *(last 4 digits)***:**	**DCN:***
Name on Voice Service Account *(If different from Applicant)***:**		**Customer Contact Telephone Number:**	
Customer's Full Residential Service Address ***(no P.O. Boxes)*:** Street: City, Town, Zip:		**Is this address a temporary address?** Yes / No *(circle the appropriate response)* (If "yes" then must verify address every 90 days.)	
Is this address also my billing address? ___ Yes ___ No *(If "no" please provide billing address)*:			

**This number is assigned to program participants of MO HealthNet, LIHEAP, Food Stamps and TANF.*

I understand the following obligations and provisions about the Lifeline program:

- The Lifeline program is a government benefit program and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household.
- 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.
- A household is not permitted to receive Lifeline benefits from multiple providers.
- Violation of the one-per-household limitation constitutes a violation of rules and will result in the subscriber's de-enrollment from the program.
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.
- I will be de-enrolled from the Lifeline program and my service deactivated if my service fails to be used for a 60-day time period. Using the service includes completion of an outbound call, purchase of additional usage, or answering an incoming call from a party not affiliated with this company.

I CERTIFY UNDER PENALTY OF PERJURY EACH OF THE FOLLOWING:

- I meet the eligibility criteria for the Lifeline program.
- I will provide notification to my voice service provider within 30 days if for any reasons I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline support, I receive more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit.
- If I move to a new address I will provide that new address to my voice service provider within 30 days.
- If I have a temporary residential address then I will be required to verify my address with my voice service provider every 90 days.
- My household will receive only one Lifeline service and, to the best of my knowledge, my household is not already receiving a Lifeline service.
- I acknowledge the obligation to re-certify my continued eligibility for Lifeline benefits at any time and failure to re-certify my continued eligibility will result in de-enrollment and the termination of Lifeline benefits.
- I consent to providing my name, telephone number and address to the Universal Service Administrative Company for the purpose of verifying I do not receive more than one Lifeline benefit. I also consent to sharing my account information with the Federal Communications Commission and Missouri Public Service Commission who oversee and administer the Lifeline program.

_____ I certify I have _____individuals in my household.
(Initial and complete only if qualifying under income threshold.)

The information supplied on this form is true and correct.

I acknowledge providing false or fraudulent information to receive Lifeline benefits is punishable by law.

_____ _____

Signature of Customer **Date**

Submit a completed signed form <u>and proof of eligibility</u>.

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)								
1	2	3	4	5	6	7	8	Each add'l person
$15,889	$21,505	$27,121	$32,737	$38,353	$43,969	$49,585	$55,201	+ $5,616/person

Acceptable documentation for meeting the criteria of 135% of the federal poverty level includes: a copy of prior year's state or federal tax return; paycheck stub (three consecutive months); a statement of benefits for Social Security, Veterans Administration, retirement/pension or Unemployment/Workmen's Compensation; or other legal documents showing current income (e.g. divorce decree, child support award). Any documentation must cover a fully year or three consecutive months within the previous twelve months.

<u>Company Use Only</u>:

I hereby attest the applicant presented acceptable proof of eligibility:

_____ _____ _____

Print name of company official **Signature** **Date**

ADDITIONAL CERTIFICATIONS:

Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer.

Multiple households sharing an address:

- ❑ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

- ❑ **I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.**

Authorizations:

- ❑ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline eligibility database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I hereby certify, under penalty of perjury, that:

- ❑ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ❑ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ❑ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ❑ The address listed below is my primary residence, not a second home or business
- ❑ If I move to a new address, I will provide that new address to the Company within 30 days
- ❑ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ❑ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ❑ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ❑ The information contained in this certification form is true and correct to the best of my knowledge

_____ _____

Signature of Customer **Date**

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ 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.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: _____/_____/_____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP) (Foodstamps)
- ☐ MO HealthNet (f/k/a Medicaid)
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
- ☐ Prior year's statement of benefits (Last 4 Digits _____)
- ☐ Notice letter of participation (Last 4 Digits _____)
- ☐ Other official document evidencing participation:

Type: _____ Last 4 Digits _____

Exhibit B

NO CONTRACT NO CREDIT CHECK NO FEES

FREE CELL PHONE & UP to 250 FREE MINUTES!

Surety WIRELESS

Your package plan comes with up to 250 anytime minutes that update each month on the customer activation date, as well as VOICEMAIL, CALLER ID and CALL WAITING at no additional cost.

You are eligible if you receive any of the following assistance:

- Medical Assistance
- Supplemental Nutrition Assistance Program
- Medicaid
- Electric Universal Service Program
- Temporary Disability Assistance Program

www.MySuretyWireless.com
877-476-3434

- Supplemental Security Income
- Temporary Cash Assistance
- Public Assistance to Adults
- Maryland Energy Assistance Program

Call NOW and we'll get you started!

Don't Qualify for Lifeline?
Ask about our low monthly-prepaid plans!

Mr. John Doe
123 Main Street
Annapolis, MD 21412

Lifeline is a non-transferable government assistance program limited to one discount per household. Only eligible consumers may enroll. Proof of income or program participation is required. Assurance Home Phone Services, Inc. is the eligible telecommunications carrier.