USAC
Universal Service Administrative Company®

USAC Home High Cost Program Search Tools Form 481

CONFIRMATION

Congratulations. Your filing has been successfully certified.

Filing 1 was successfully certified on Tue 23 Jun 15 12:24:52 PM EDT by sbentson@cashlandok.com .

SAC : 439040

SPIN : 143028902

Carrier Name : The Telephone Company Inc.

Program Year : 2016

A confirmation email will be sent to the email address on record for your user ID. Please email USAC at HCCERTS@U within 24 hours.

Return to 481 Search Print Confirmation Page

© 1997-2015, Universal Service Administrative Company. All Rights Reserved

FCC Form 481 - Carrier Annual Reporting Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	439040
<015>	Study Area Name	The Telephone Company Inc.
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Samantha Bentson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4057485510 ext.3
<039>	Contact Email Address: Email of the person identified in data line <030>	sbentson@cashlandok.com

ANNUAL REPORTING FOR ALL CARRIERS

			54.313 Completion Required	54.422 Completion Required
			(check box when complete)	
<100>	Service Quality Improvement Reporting	(complete attached worksheet)		
<200>	Outage Reporting (voice)	(complete attached worksheet)		✓
<210>	✓ <-- check box if no outages to report			
<300>	Unfulfilled Service Requests (voice)			
<310>	Detail on Attempts (voice)	(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)			
<330>	Detail on Attempts (broadband)	(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed			✓
<420>	Mobile	3.5		
<430>	Number of Complaints per 1,000 customers (broadband)			
<440>	Fixed			
<450>	Mobile			
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)		✓
<510>	439040OK510.pdf	(attached descriptive document)		✓
<600>	Functionality in Emergency Situations	(check to indicate certification)		✓
<610>	439040OK610.pdf	(attached descriptive document)		✓
<700>	Company Price Offerings (voice)	(complete attached worksheet)		
<710>	Company Price Offerings (broadband)	(complete attached worksheet)		
<800>	Operating Companies and Affiliates	(complete attached worksheet)		✓
<900>	Tribal Land Offerings (Y/N)? ○ ○	(if yes, complete attached worksheet)		
<1000>	Voice Services Rate Comparability Certification			
<1010>		(attach descriptive document)		
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) ○ ○	(if not, check to indicate certification)		
<1110>		(complete attached worksheet)		
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)		✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>		(check to indicate certification)		
<2005>		(complete attached worksheet)		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)		
<3005>		(complete attached worksheet)		

(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	430040
<015>	Study Area Name	The Telephone Company, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bentsen
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485510 ext 3
<039>	Contact Email Address - Email Address of person identified in data line <030>	abentsen@rachlaudok.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no) ○ ○
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) ○ ○

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	439.40
<015>	Study Area Name	The Telephone Company, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bertsch
<035>	Contact Telephone Number - Number of person identified in data line <030>	4757485512 ext 1
<039>	Contact Email Address - Email Address of person identified in data line <030>	abertsch@cashlandtk.com

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	439040
<015>	Study Area Name	The Telephone Company Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cacantha Bentson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485513 ext 3
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbentson@eahlandoc.com

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

<703>

<a1> State	<a2> Exchange (ILEC)	<a3> SAC (CETC)	<b1> Rate Type	<b2> Residential Local Service Rate	<b3> State Subscriber Line Charge	<b4> State Universal Service Fee	<b5> Mandatory Extended Area Service Charge	<c> Total per line Rates and Fees

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	439343
<015>	Study Area Name	The Telephone Company Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bentann
<035>	Contact Telephone Number - Number of person identified in data line <030>	4857495512 ext.1
<039>	Contact Email Address - Email Address of person identified in data line <030>	abentann@ashlandok.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (*select*)

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	439040
<015>	Study Area Name	The Telephone Company, Inc.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bentsoz
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485513 ext.3
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbentsoz@cashlandsr.com

<810>	Reporting Carrier	The Telephone Company, LLC
<811>	Holding Company	Not Applicable
<812>	Operating Company	The Telephone Company, LLC

<813>

<a1> Affiliates	<a2> SAC	<a3> Doing Business As Company or Brand Designation

(900) Tribal Lands Reporting Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432040
<015>	Study Area Name	The Telephone Company Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Benson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485513 ext. 3
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbenson@cableland.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

		Select Yes or No or Not Applicable
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	433040
<015>	Study Area Name	The Telephone Company, Inc
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bertero
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485513 ext 3
<039>	Contact Email Address - Email Address of person identified in data line <030>	[illegible]

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	439043
<015>	Study Area Name	The Telephone Company, Inc.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cassantha Dentsch
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485510 ext 3
<039>	Contact Email Address - Email Address of person identified in data line <030>	[illegible]

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

439043DK1203.pdf

Name of Attached Document

<1220> Link to Public Website HTTP www.ctl-ok.com

*Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☑

<1222> Details on the number of minutes provided as part of the plan, ☑

<1223> Additional charges for toll calls, and rates for each such plan. ☑

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	[illegible]
<015>	Study Area Name	The Telephone Company, Inc.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	[illegible]
<035>	Contact Telephone Number - Number of person identified in data line <030>	[illegible]
<030>	Contact Email Address - Email Address of person identified in data line <030>	[illegible]

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, Frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification (47 CFR § 54.313(b)(1)ii)

<2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)

<2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

<2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))

<2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))

<2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))

<2015> 2016 and future Frozen Support Calculation (47 CFR § 54 313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

<2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

<2017> 3rd year Broadband Service Certification

<2018> 5th year Broadband Service Certification

<2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54 313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	439042
<015>	Study Area Name	The Telephone Company, Inc.
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Lamentha Berrogu
<035>	Contact Telephone Number - Number of person identified in data line <030>	435-748-5516 ext 3
<039>	Contact Email Address - Email Address of person identified in data line <030>	nkenton@cashlandtx.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))? (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check those boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires.

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement, or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement, which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	439340
<015>	Study Area Name	The Telephone Company, Inc.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Sama Cha Pehlson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485510 ext. 1
<039>	Contact Email Address - Email Address of person identified in data line <030>	[illegible]

Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	439040
<015>	Study Area Name	The Telephone Company Inc.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bentson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485510 ext.3
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbentson@auhlandok.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: The Telephone Company Inc.

Signature of Authorized Officer: Date

Printed name of Authorized Officer: Samantha Bentson

Title or position of Authorized Officer: Manager

Telephone number of Authorized Officer: 4057485510 ext.3

Study Area Code of Reporting Carrier: 439040 Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	439940
<015>	Study Area Name	The Telephone Company Inc.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Samantha Bentson
<035>	Contact Telephone Number - Number of person identified in data line <030>	4057485510 ext.3
<039>	Contact Email Address - Email Address of person identified in data line <030>	sbentson@oashlandok.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier

I certify that (Name of Agent)_____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.

Name of Authorized Agent:

Name of Reporting Carrier:

Signature of Authorized Officer: Date:

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier: Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier

I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.

Name of Reporting Carrier:

Name of Authorized Agent or Employee of Agent:

Signature of Authorized Agent or Employee of Agent: Date:

Printed name of Authorized Agent or Employee of Agent:

Title or position of Authorized Agent or Employee of Agent:

Telephone number of Authorized Agent or Employee of Agent:

Study Area Code of Reporting Carrier: Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001

Attachments

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
The Telephone Company, Inc.	

THE TELEPHONE COMPANY, INC. COMPLIANCE PLAN

George M. Makohin, OBA #5639
Downing Place
6520 N. Western, Suite 202
Oklahoma City, Oklahoma 73116
Telephone: (405) 858-7220
Fax: (405) 858-8601
Email: gmmok@att.net

ATTORNEY FOR
THE TELEPHONE COMPANY, INC.

September 18, 2013

The Telephone Company, Inc. ("TTC" or the "Company"), 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*.[1] TTC was previously designated as an Eligible Telecommunications Carrier ("ETC") in Oklahoma for wireline services on December 15, 2004, and for wireless services on July 28, 2011.

TTC will continue to comply with 911 requirements as described below and 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.[2]

TTC has complied and 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. This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company has taken to implement the obligations contained in the Lifeline Reform Order, including the procedures the Company follows in enrolling a subscriber in Lifeline and requesting

---

[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) ("*Lifeline Reform Order*"). TTC is submitting 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).

[2]See *Lifeline Reform Order*, ¶ 368. Although the Company 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 the state for purposes of state universal service funding under state program rules and requirements.

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 will offer Lifeline services, the geographic areas in which it has offered and will continue to offer services, and a detailed description of the Company's Lifeline service plan offerings.

ACCESS TO 911 AND E911 SERVICES

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.[3] The Company has complied with these conditions.

The Company provides its Lifeline customers with access to 911 and E911 services immediately upon activation of service. All Company customers have available access to emergency calling services at the time that Lifeline service is initiated, and such 911 and E911 access is and will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

The Company uses AT&T as its underlying wireless network providers/carrier through a Mobile Virtual Network Enabler (MVNE) intermediary – Red Pocket ("Red Pocket"). AT&T routes 911 calls from the Company's customers in the same manner as 911 calls from its own retail

[3]See *Lifeline Reform Order*, ¶ 373.

customers. To the extent that AT&T is certified in a given PSAP territory, this 911 capability functions the same for the Company. The Company also 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.

The Company ensures that all handsets used in connection with its Lifeline service offerings are E911-compliant. All of the Company's phones are E911-capable handsets. The Company uses phones from suppliers that have been certified to ensure that the handset models used meet all 911 and E911 requirements. As a result, 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. LIFELINE SUBSCRIBER ENROLLMENT PROCEDURES

A. Policy

The Company will comply with the uniform eligibility criteria established in new 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.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification

requirements described below, the Company 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

TTC enrolls its Lifeline customers in-person at the storefronts of an affiliated company, Cashland, which operates throughout Oklahoma. Because of the use of permanent Cashland storefront locations, TTC customers always know where they can go to ask questions, get replacement equipment (e.g., batteries and chargers) and purchase additional services or upgrades. TTC enrolls its customers at store locations (Cashland, which is owned by the same family that owns TTC). In the process of enrollment, TTC obtains and scans photo ID's, and obtains the verification of the customer as to identity and address on the enrollment form. TTC also obtains eligibility proof, which is cross-checked and entered into the enrollment information. When available, TTC will validate the eligibility and non-duplication of qualifying subscribers through the national database.

The customer verifies, under penalty of perjury, that the information being provided, including identity and address, is true and correct. The customer's photo ID is appended to the customer's account information.

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.[4] These personnel are trained to answer questions about Lifeline eligibility, and review required documentation to determine whether it satisfies the Lifeline Reform Order and state-specific eligibility requirements.

---

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

Proof of Eligibility. Company (and Cashland) personnel are trained on acceptable documentation required to establish income-based and program-based eligibility.[5] 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.[6]

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three consecutive months' time.[7]

Company (and Cashland) personnel examine this documentation for each Lifeline applicant, and record the type of documentation and the type of benefit used to satisfy the income- or

---

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

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

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

program-based criteria by checking the appropriate box on the application form.[8] The Company does not retain a copy of this documentation.[9] In addition, a TTC employee is responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement.

TTC requires Cashland employees involved in the enrollment process to go through TTC's training process. By establishing agency relationships with all of its Company personnel, including any possible future Cashland or other agency outlets, TTC meets the "deal directly" requirement adopted in the TracFone Forbearance Order.[10]

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.'"[11] Because TTC is responsible for the actions of all of its employees and agents with respect to customer enrollment, and a TTC employee is responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, TTC will always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

---

[8]See *Lifeline Reform Order*, ¶101; sections 54.41 0(b)(1)(iii), 54.410(c)(1)(iii).

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

[10]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).

[11] See *Lifeline Reform Order*, ¶ 110.

De-Enrollment for Ineligibility. If the Company 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 dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.[12] The demonstration of eligibility must comply with the annual verification procedures below and found in new 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 in person or in writing.

C. Subscriber Certifications for Enrollment

The Company has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company (and Cashland) personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.[13] The Company shares the Commission's concern about the integrity of the Lifeline program and is thus committed to the safeguards stated in this Compliance Plan, and believes that these safeguards will prevent the Company's customers from engaging in abuse of the program, inadvertently or intentionally. Every applicant is required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.[14] Applicants

---

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

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

[14]See Model Enrollment Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

that seek to enroll based on income eligibility are referred to a worksheet showing the Federal Poverty Guidelines by household size.[15] Applicants complete the form in person. In addition, Company personnel verbally explain the certifications to consumers when they are enrolling, in person.[16]

Disclosures. The Company's application and certification (enrollment) forms 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.[17]

Applications and certification (enrollment) forms 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.[18]

---

[15]See Income Eligibility Worksheet, included as Exhibit B.

[16]See *Lifeline Reform Order*, ¶123.

[17]See *id.*, ¶121; section 54.410(d)(1).

[18]See section 54.405(c).

In addition, the Company notifies the applicant 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.[19]

Information Collection. The Company collects the following information from the applicant in the application/certification (enrollment) form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient[20]); (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.[21]

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company requires the applicant to certify, under penalty of perjury, in writing by electronic signature recording in TTC's secure system,[22] 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

---

[19]See *Lifeline Reform Order*, ¶257.

[20]See *Lifeline Reform Order*, ¶ 87.

[21]See section 54.410(d)(2).

[22]See *Lifeline Reform Order*, §§168-69; section 54.419.

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 is required to authorize the Company to access any records required to verify the applicant's statements on the application/certification (enrollment) form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the

Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.[23]

D. Annual Verification Procedures

The Company annually re-certifies and will continue to 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 new section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.[24] Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.[25] The Company has re-certified the eligibility of its existing subscribers as of June 1, 2012, and has reported the results to USAC.[26]

Verification De-Enrollment. The Company will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.[27] The Company will give

---

[23]See Section 54.404(b)(9). The application/certification (enrollment) form describes 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.*

[24]See Lifeline Reform Order, ¶120.

[25]See *id.*, ¶145.

[26]See *id.*, ¶130.

[27]See *id.*, ¶142; section 54.54.405(e)(4).

subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

E. Activation and Non-Usage

The Company does not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the Company activates the Company's prepaid service by completing a test call. A code must be entered and a test call must be made in order for the service to be activated and for TTC to seek Lifeline reimbursement for that customer. For phones sold in-person, a representative enters a code and makes a test call with the customer present in order to make certain that the phone is operational and in order to complete the enrollment process. Phones are not mailed to customers.

In addition, after service activation, in the event that the Company no longer has a Lifeline plan that involves a charge to customers (see below - the Company currently bills its customers), the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. 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.[28] 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 incoming call from a party other than the Company;

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

or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.[29]

Under such a non-billing scenario, if the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company 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.[30]

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 its database, Company personnel will emphasize the "one Lifeline phone per household" restriction in their direct 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 (and Cashland) personnel interacting with existing and potential Lifeline customers undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order*.

Company (and Cashland) personnel that will interact with existing and potential Lifeline customers are and will be required to complete a rigorous training program. During this program,

---

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

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

Company (and Cashland) personnel are thoroughly trained on compliance practices, policies and procedures including, among other areas, a thorough training on the enrollment process. For example, Company personnel that will perform customer enrollment are trained on how to use the Company's office support systems, to read aloud the appropriate disclosures to prospective customers such as the "one-per-household" and activation and non-usage requirement disclosures, request additional documentation proving identity and address verification and what constitutes proof of eligibility, among other important practices.

Company (and Cashland) personnel are also trained to display approved marketing materials and banners. TTC has a designated employee compliance training manager who is accessible to Company (and Cashland) personnel for questions after training. Company (and Cashland) personnel are also trained what to do in the event they suspect fraud or any violation. The Company has a whistleblower policy for Company personnel to immediately report any violation of compliance policies and procedures.

Database. When the National Lifeline Accountability Database ("NLAD") becomes available, the Company will comply with the requirements of new rule section 54.404. 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.[31]

---

[31]See *Lifeline Reform Order*, ¶203. The Company will also transmit to NLAD the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶189-195; section 54.404(b)(6). Further, Company will update each subscriber's information in 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).

One-Per-Household. The Company has implemented the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household[32] through the use of its application and certification (enrollment) 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.[33] If so, and the applicant lives at 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).[34] Further, if a subscriber provides a temporary

---

[32]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).

[33]See *Lifeline Reform Order*, ¶78.

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

address on his or her application/certification (enrollment) form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.[35]

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. TTC will also ask each customer whether the customer is receiving Lifeline service from one of the other major Lifeline providers in the state.

Marketing Materials. Within the deadline provided in the Lifeline Reform Order, the Company has included 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; (7) TTC's name (the ETC); and (8) the Company's application/certification form states 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.[36] These statements are included in all print, audio video and web materials used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification

---

[35]See *Lifeline Reform Order*, ¶89.

[36]See *Lifeline Reform Order*, ¶275; section 54.405(c).

forms.[37] This includes the Company's website (www.ttcok.com) and outdoor signage.[38] A sample of the Company's marketing materials is included as Exhibit C.

G. Company Reimbursements From the Fund

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.[39] Further, the Company will submit its FCC Forms 497 the eighth day of each month in order to be reimbursed the same month.[40]

In addition, the Company will keep accurate records as directed by USAC[41] and as required by new section 54.417 of the Commission's rules. For example, TTC will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that TTC queried the duplicates database; 2) date and information that TTC 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

---

[37] *Id.*

[38] *Id.*

[39] See *Lifeline Reform Order*, ¶128; section 54.407(d).

[40] See *Lifeline Reform Order*, §§302-306.

[41] See section 54.407(e).

database was available to determine subscriber eligibility;[42] 6) 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

The Company has submitted and will continue to 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;[43] (2) is in compliance with all federal Lifeline certification procedures;[44] and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.[45]

In addition, the Company will provide the results of its annual recertifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).[46] Further, as discussed above, the

---

[42]Such documentation includes the documentation listed in Section I.B, *supra*.

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

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

[45]See section 54.416(a)(3).

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

Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[47]

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,[48] 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.[49] The Company 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.[50] Finally, 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.[51]

I. Cooperation with State and Federal Regulators

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

---

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

[48]See section 54.422(c).

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

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

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

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier ;[52]

- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicate enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicate 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

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe[53] 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

The Company will offer its Lifeline service in the states where it is designated as an ETC (currently only in Oklahoma) and throughout the coverage area of AT&T's wireless footprint. TTC's current Lifeline plan options are as follows:

$1.00 Plan**: Unlimited Talk
This plan includes unlimited voice minutes per month (there are no rollover minutes). There is a nationwide calling scope

$5.00 Plan**: Unlimited Talk, Text, Picture Messaging
This plan includes unlimited voice minutes and text messages per month, including picture messaging (there are no rollover minutes). There is a nationwide calling scope.

$9.95 Plan**: Unlimited Talk, Text, Picture Messaging, 100 MB of Data & Unlimited International Calling to Canada, China, Mexico*, India*, United Kingdom* (*Select Cities Only, Landlines Only)

---

[52]The Company anticipates that the need to provide such information will terminate following the implementation of the national duplicates database.

[53]See section 54.405(e)(1).

This plan includes unlimited nationwide voice minutes and text messages per month, including picture messaging (there are no rollover minutes), plus 100 megabytes of data and international calling as stated above.

** All plans have an excessive use limitation, primarily related to text messages.

Customers may select either a free wireless handset or purchase an upgraded phone, such as a smartphone. The Company has a plan option that allows low-income customers to add affordable data usage to their free voice/text minutes thereby supporting greater smartphone utilization, consistent with the Commission's goal of promoting broadband access to all Americans. Additional information regarding the Company's plans, rates and services can be found on its website www.ttcok.com.

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

Financial and Technical Capabilities. Revised 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.[54] The Compliance Plan Public Notice requires that carriers' compliance plans 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.

TTC has been providing wireline Lifeline service in Oklahoma since 2005, and wireless ETC

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

services in Oklahoma since 2011. TTC received a Certificate of Convenience and Necessity from the Oklahoma Corporation Commission to provide local and long distance wireline services in August 2003, and TTC has been providing local and long distance non-Lifeline services in Oklahoma since then. TTC does not rely exclusively on Lifeline reimbursement for the Company's operating revenues. TTC is in good standing with all vendors.

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." The Company certifies that it will comply with the service requirements applicable to the support the Company receives.[55] The Company will provide 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 (currently, Oklahoma only). The Company's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. The Company's Lifeline offerings include packages in Section II supra that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-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"). TTC, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all

---

[55] 47 C.F.R. §54.202(a)(1).

usage is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.[56]

IV. Conclusion

TTC 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,

George M. Makohin, OBA #5639
Downing Place
6520 N. Western, Suite 202
Oklahoma City, Oklahoma 73116
Telephone: (405) 858-7220
Fax: (405) 858-8601
Email: gmmok@att.net

ATTORNEY FOR
THE TELEPHONE COMPANY, INC.

[56]See Lifeline Reform Order, ¶230.

EXHIBIT A

Telephone Co. Online

Home Add Customer Signups Changes Reports Services Drop Code Logout User: AKH Site: PHONE

Employee Initial:

Lifeline Wireless Application

* - Optional fields

Lifeline Certification:

Do you currently have a lifeline phone service, either landline or cell phone?

☐ I acknowledge that, to the best of my knowledge, no one else at my household is receiving a Lifeline-supported service from any other provider.

Certification Date: 9/17/2013 Format: mm/dd/yyyy

Certification Renewal Date: 9/17/2014 Format: mm/dd/yyyy

Work Phone Number: Format: 405-555-123-F (Your contact # during weekdays between 8am and 5pm)

Social Security Number:

Date Of Birth: Format: mm/dd/yyyy

Eligibility By Program

I participate in at least ONE of the following programs:

- ☐ Food Stamps
- ☐ Aid to Families with Dependent Children (AFDC)
- ☐ Supplemental Security Income (SSI)
- ☐ Medical Assistance (Medicaid)
- ☐ Vocational Rehabilitation (including aid to the hearing impaired)
- ☐ Oklahoma Sales Tax Relief
- ☐ Federal Public Housing
- ☐ Low Income Energy Assistance Program
- ☐ Bureau of Indian Affairs General Assistance
- ☐ Temporary Assistance for Needy Families (TANF) Tribally-administered block grant programs
- ☐ Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision); or
- ☐ National School Lunch Program (only applicant or customer who satisfy the income standard of the program for free meals)

Qualifying Beneficiary

Name:

☐ I certify that individual named on documentation demonstrating program participation is part of my Household.

☐ I certify that individual named on documentation demonstrating program participation does not already receive Lifeline.

Eligibility By Income

If your income is at or below 135% of the federal poverty guidelines, as shown below, you can qualify for Lifeline.

How many people are in your Household? (complete only if qualifying under this Section)

Household Size	Total Annual Income	Household Size	Total Annual Income	Household Size	Total Annual Income
1 person	$15,080	3 people	$25,772	5 people	$36,464
2 people	$20,426	4 people	$31,118	Each additional person	$5,346

Customer Certification Rules

☐ I certify under penalty of perjury that I either participate in the indicated qualifying federal program or I meet the income qualification to establish my eligibility for Lifeline. If required to do so, I have provided accurate documentation of my eligibility.

☐ I certify I am head of the household, I am an adult 18 years or older (unless an emancipated minor), I am not listed as a dependent on another person's tax return (unless over the age of 60) and the address listed is my primary residence.

I confirm local voice service discounts under the low income programs are limited to one per household and that my household is receiving no more than one Lifeline supported service. If I am participating in another Lifeline program at the time I apply for TTC's Lifeline service, I agree to cancel that Lifeline service with any other provider. I certify that I will only receive one Lifeline connection, will not have simultaneous or multiple Lifeline discounts with another provider. I understand that I must inform TTC within 30 days if I (1) no longer participate in a federal qualifying program or programs or my annual household income exceeds 135% of the Federal Poverty Guidelines; (2) I am receiving more than one Lifeline-supported service per household; or (3) I, for any other reason, no longer satisfy the criteria for receiving Lifeline support. I attest under penalty of perjury that I understand this notification requirement, and that I may be subject to penalties if I fail to follow this rule.

I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and that failure to do so will result in the termination of the my Lifeline benefits.

I understand that Lifeline service is a non-transferable benefit, and that I may not transfer my service to any other individual, including another eligible low-income consumer.

I hereby authorize TTC to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize TTC to release any records required for the administration of the Lifeline program (name, telephone number, address, date of birth, last 4 digits of SSN or Tribal ID, amount of support being sought, means of qualification for support, and dates of service initiation and termination), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

I understand that if I move, I must provide a new address to TTC within 30 days of my move. I understand that if I provided a Temporary Address, I must verify with TTC every 90 days that I am using the same address. I understand that if I fail to do so, I will lose my Lifeline discount

I certify that my address is on federally recognized tribal lands.

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

The information in this certification is true and correct to the best of my knowledge.

Representative Full Name:

Documentation Reviewed:

Attach ID: Browse...

Verify Lifeline

Physical Address:

Listing Name: *(first)* *(last)*

Physical Address:

City:

State: OK Zip: Temporary address:

County:

Duplicate Check

Billing Address:

Same as Physical Address

Billing Name: *(first)* *(last)*

Address:

City:

State: OK Zip:

In the event of a problem call:

Contact's Name:

Contact Phone Number: *Format 405-555-1234*

Wireless Phone Number: *Format 405-555-1234* (wireless number just activated)

Choose services:

Service	Monthly Rate	Connection Fee
Wireless Lifeline Unlimited Talk $1.00	$1.00	$30.00
Wireless Lifeline Talk & Text Only		

$5.00	$5.00	Free	
Wireless Lifeline Unlimited Plus $9.95	$9.95	$30.00	
Total:	$0.00	$0.00	Calculate

Payment:

		Full payment $
Connection Fees:		3 installments $
		6 installments $
Monthly Rate:		
Sales Tax (12%):		
911, Num Port., Fed Line, Relay Tax:	$0.00	
Credit Card Fee:		Pay with credit card
Enhanced Lifeline Non-State Eligible:	$0.00	
*Additional Payment:		
Total Due:		Get Total

*Credit Card Number: *Expiration: / *Confirmation #:

Miscellaneous:
*Notes:

Reminders:

How Did You Hear About Us? TV

Bill Payment Options

Agent Expedite Fee

Suspend

Signature:

Sign Clear

Submit

Copyright © 2006-2013 Sandy Beaches Software

EXHIBIT B

The Telephone Company, LLC

Get Started for only

No Connection Fee!**

The Telephone Company, LLC was founded to provide our valued customers with a cost-effective home and cellular phone service. Today, our goal remains the same – to help our customers stay connected for less. As our customers' needs have changed, so have our service offerings.

We now offer the most comprehensive wireless phone service plan available featuring Unlimited Talk & Text with Picture Messaging and 100MB of data at only $5 a month!

Getting connected is simple. **NO CREDIT CHECK, NO DEPOSIT, NO HASSLES.** Simply go to one of the convenient Cashland locations and a friendly staff member will quickly get you signed up.

Lifeline Wireless Phone Service

Our Monthly Lifeline Wireless Plans:

- $1.00 Unlimited Talk*
- $5.00 Unlimited Talk, Text,Picture Messaging and 100MB of Data**
- $10.95 Unlimited Talk, Text, Picture Messaging and 500MB of Data**
- $19.95 Unlimited Talk, Text, Picture Messaging, 1GB of Data and International Features

Wireless Phone Service:

- Unlimited Nationwide Calling
- Unlimited Talk & Text Available
- Unlimited Picture Messaging Available
- FRIENDLY LOCAL Representatives
- Prepaid, No Contract Monthly Plan

*Some restrictions apply. **Select plans only.

To receive this service program you must participate in one of the following programs:

- Food Stamps
- Medicaid
- SSI
- Vocational Rehabilitation
- OK Sales Tax Relief
- Public Housing AFDC
- Subsidized Head Start
- Free School Lunches
- Eligibility by Income

The Telephone Company, LLC

405.752.5900 • 866.441.2144

www.ttcok.com

Home Phone Service Programs

Lifeline Program

- $1.95 a month
- Connection fee of $30.00

Connection fee payments may be deferred over two months. Stop by one of our Cashland locations for program details.

Lifeline Add on Packages

$5.00 Silver Package:
Caller ID • Call Waiting
Three Way Calling • Call Waiting ID

$7.00 Gold Package:
Silver Package • Call Blocker
Call Forwarding

$12.00 Unlimited Long Distance
- Unlimited Minutes of Long Distance

$18.00 Unlimited PLUS Package
- Gold Package
- Includes Unlimited Long Distance

Basic Phone Service Program

Everyone qualifies for only $39.95 per month. There is no credit check or deposit for basic service! The sign-up will only take approximately 5 minutes and is hassle free!

*Feature pricing different for Basic.

405.752.5900 • 866.441.2144

Cashland Locations

NORTH
1424 W. Britton Road
Oklahoma City
405-843-8480

NORTHWEST
4625 N.W. 39th Street
Oklahoma City
405-789-4600

NORTHEAST
1901 N.E. 23rd Street
Oklahoma City
405-424-1222

SOUTH
929 S.W. 59th Street
Oklahoma City
405-634-7874

SOUTHWEST
3013 S.W. 29th Street
Oklahoma City
405-681-4447

MIDWEST CITY
1948 S. Air Depot
Midwest City
405-736-1444

GUTHRIE
618 S. Division
Guthrie
405-260-2999

ENID
2420a W. Owen K. Garriott
Enid
580-234-4447

LAWTON
5525 N.W. Cache Road
Lawton
580-351-1222

LAWTON
8 N.W. Sheridan Road
Lawton
580-248-1271

TULSA
6229 E. 21st Street
Tulsa
918-838-2435

TULSA
11003 E. 41st Street
Tulsa
918-622-0343

Stop in Today!

- This is a Lifeline service provided by The Telephone Company, LLC, which is an eligible telecommunications carrier.
- Lifeline is a government assistance program.
- Service is non-transferable.
- Only one Lifeline discount may be received per household.
- Only eligible consumers may enroll in the program.
- 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.
- Customers must present proper documentation confirming eligibility for the Lifeline program through participation in Federal Public Housing Assistance, Food Stamps, Low-Income Home Energy Assistance Program (LIHEAP), Income below 135% of the Federal Poverty Guidelines, Medicaid, National School Lunch's Free Lunch Program, Supplemental Security Income (SSI), Temporary Assistance to Needy Families (TANF). Additional Program Based Eligibility criteria varies by state. Proof of eligibility includes an eligible program card or statement of benefits.

The Telephone Company, LLC

The Telephone Company, LLC

405.752.5900 • 866.441.2144

Wireless Lifeline Service

$1.00* a month — Unlimited Talk

$5.00 a month** — Unlimited Talk, Text, Picture Messaging and 100MB of Data

$10.95 a month** — Unlimited Talk, Text, Picture Messaging and 500MB of Data

$19.95* a month — Unlimited Talk, Text, Picture Messaging, 1GB of Data and International Features

Get Started for ONLY

No Connection Fee!**

www.ttcok.com

The Telephone Company, LLC

405.752.5900 • 866.441.2144

Wireless Lifeline Service

$1.00* a month	Unlimited Talk
$5.00** a month	Unlimited Talk, Text, Picture Messaging and 100MB of Data
$10.95** a month	Unlimited Talk, Text, Picture Messaging and 500MB of Data
$19.95* a month	Unlimited Talk, Text, Picture Messaging, 1GB of Data and International Features

Get Started for ONLY

No Connection Fee!**

www.ttcok.com

*Some restrictions apply **Select plans only.

Cashland Locations

NORTH
1424 W. Britton Road
Oklahoma City
405-843-8480

NORTHWEST
4625 N.W. 39th Street
Oklahoma City
405-789-4600

NORTHEAST
1901 N.E. 23rd Street
Oklahoma City
405-424-1222

SOUTH
929 S.W. 59th Street
Oklahoma City
405-634-7874

SOUTHWEST
3013 S.W. 29th Street
Oklahoma City
405-681-4447

MIDWEST CITY
1948 S. Air Depot
Midwest City
405-736-1444

GUTHRIE
618 S. Division
Guthrie
405-260-2999

ENID
2420a W. Owen K. Garriott
Enid
580-234-4447

LAWTON
5525 N.W. Cache Road
Lawton
580-351-1222

LAWTON
8 N.W. Sheridan Road
Lawton
580-248-1271

TULSA
6229 E. 21st Street
Tulsa
918-838-2435

TULSA
11003 E. 41st Street
Tulsa
918-622-0343

Stop in Today!

- This is a Lifeline service provided by The Telephone Company, LLC, which is an eligible telecommunications carrier.
- Lifeline is a government assistance program.
- Service is non-transferable.
- Only one Lifeline discount may be received per household.
- Only eligible consumers may enroll in the program.
- 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.
- Customers must present proper documentation confirming eligibility for the Lifeline program through participation in Federal Public Housing Assistance, Food Stamps, Low-Income Home Energy Assistance Program (LIHEAP), Income below 135% of the Federal Poverty Guidelines, Medicaid, National School Lunch's Free Lunch Program, Supplemental Security Income (SSI), Temporary Assistance to Needy Families (TANF). Additional Program Based Eligibility criteria varies by state. Proof of eligibility includes an eligible program card or statement of benefits.

The Telephone Company, LLC

www.ttcok.com

EXHIBIT C

The Telephone Company, Inc.

Income Eligibility Worksheet

USAC

Lifeline Program

2015 Federal Poverty Guidelines – 135%

Household Size	48 Contiguous States and D.C.	Alaska	Hawaii
1	$15,890	$19,872	$18,293
2	$21,506	$26,892	$24,746
3	$27,122	$33,912	$31,199
4	$32,738	$40,932	$37,652
5	$38,354	$47,952	$44,105
6	$43,970	$54,972	$50,558
7	$49,586	$61,992	$57,011
8	$55,202	$69,012	$63,464
For each additional person, add	$5,616	$7,020	$6,453

Please Note:

- Source: Federal Register, Vol. 80, No. 14, January 22, 2015, pp. 3236-3237
- The federal poverty guidelines are typically updated at the end of January.

Applicants must list the number of individuals in their household on the Lifeline Enrollment form. Applicant seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to verify eligibility;

- ✓ The prior year's state, federal, or tribal tax return
- ✓ Current income statement from employer

- ✓ Paycheck stub
- ✓ Social Security statement of benefits
- ✓ Veterans Administration statement of benefits
- ✓ Retirement/pension statement of benefits
- ✓ Unemployment/worker's compensation statement of benefits
- ✓ Federal or Tribal notice letter of participation in General Assistance
- ✓ A divorce decree, child support award, or other official document containing income information for at least three months

Lifeline service is provided by The Telephone Company, Inc. and is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Customers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a nontransferable benefit and cannot be transferred to any other person.

Wireless Terms and Conditions of Service

The Telephone Company, Inc. participates in a Lifeline Assistance program supported by the Federal Universal Service Fund program. The Terms of Service listed below apply to The Telephone Company, Inc. services and wireless phones activated with The Telephone Company, Inc.

Activating service with The Telephone Company, Inc. or making changes to your account will make these Terms of Services effective. If you do not wish to accept these terms, please contact The Telephone Company, Inc. at (405)752-5900 or (866)441-2144 before you activate your service or make any changes to your account. By accepting the Terms and Conditions of Service of The Telephone Company, Inc. you represent that you are at least 18 years old and that you meet the requirements and are eligible for Lifeline Service from The Telephone Company, Inc.

Eligibility for Lifeline service program is dependent on the subscriber. Subscribers may qualify for a Lifeline program if they participate in one of the government programs listed below or qualify based on household income eligibility standards as defined below. When activating service with The Telephone Company, Inc. a subscriber acknowledges and consents to the use of customer's name, telephone number, and address to be given to the Universal Service Administrative Company (USAC), the administrator of the program, and/or its agents for the purpose of verifying that subscriber does not receive more than one Lifeline benefit. Refusal to grant this permission will mean consumer is not eligible for Lifeline service. Subscriber grants authorization to The Telephone Company, Inc. to access any records required to verify subscriber's statements and to confirm continued eligibility for Lifeline assistance. This consent survives any termination of this agreement. If a subscriber or any member a subscriber's family participates in a Lifeline program from another provider the subscriber is responsible for notifying the other provider that they have been approved for service with The Telephone Company, Inc. and will request their service with the other provider be disconnected. Notice to terminate service from any other provider's Lifeline program must be given prior to activating new service with The Telephone Company, Inc.

Eligibility Requirements

A person is eligible to receive Lifeline service (and its associated discounts) if they participate in one or more of the following programs:

- ✓ Food Stamp program (different titles for program vary by State)

- ✓ Supplemental Security Income
- ✓ Medicaid
- ✓ National School Lunch Program
- ✓ Federal Public Housing Assistance (Section 8)
- ✓ Low Income Home Energy Assistance Program
- ✓ Temporary Assistance for Needy Families Program

A qualification for Lifeline assistance based on Income Eligibility may be met if an individual's total combined household income meets the defined US Government Income Poverty Guidelines. Proof of income eligibility must be provided to The Telephone Company, Inc. through documents such as current tax return, current paystubs, etc. A complete list of accepted documents to provide Income Eligibility can be provided by calling The Telephone Company, Inc. at (405)752-5900 or (866)441-2144.

By completing The Telephone Company, Inc. application you consent to the release of your information, including financial information, as required for the administration of The Telephone Company, Inc. service with regard to the Lifeline program.

The Telephone Company, Inc. reserves the right to review your eligibility status at any time and requires you to provide The Telephone Company, Inc. written documentation of either your household income or your participation in a qualifying federal or state program. You may only receive Lifeline Assistance for a single landline or wireless telephone at your principal residence. If you or any resident at your primary address receives Lifeline Assistance from any other telephone company, you are responsible for notifying your current service provider that you have been approved for Lifeline Assistance through The Telephone Company, Inc. and your other Lifeline service must be terminated prior to activating Lifeline service with The Telephone Company, Inc.

Our Right to Make Changes

Terms of Service may change at any time, including pricing for paid service. Unless expressly prohibited by law, The Telephone Company, Inc. reserves the right to modify or cancel this service, your account, or take corrective action at any time and for any reason; including, but not limited to, violation of any provision of these Terms and Conditions of Service. Right to use our service is subject to our company policies, procedures, rates and The Telephone Company, Inc.'s Terms and Conditions of Service which we reserve the right to change at any time.

Wireless Services

The Telephone Company, Inc. provides service for personal use only. Service may not be transferred to any third party or shared among multiple individuals.

You may not use our service in a manner that interferes with another customer's use of our service. Our ability to provide quality voice service may be impaired when customers place abnormally high volume of calls, send or receive unusually high numbers of messages, or repeatedly place calls of unusually long duration, relative to typical usage

by other customers on similar service plans. Usage such as stated above suggests that a mobile phone is being used for reasons other than personal use and is in violation of The Telephone Company, Inc.'s Terms and Conditions of Service. The Telephone Company, Inc. has safeguards and conducts regular audits to ensure that its customers do not use the service in an unreasonable manner that is inconsistent with personal, non-commercial use. The Telephone Company, Inc. reserves the right to respond to such unusual usage by suspending service to the individual's account in question.

The Telephone Company, Inc. offers in Oklahoma an unlimited voice plan. Unlimited use does not mean unreasonable use. If a subscriber is found to be utilizing their unlimited features in an excessive manner they are subject to have their service turned off. Unlimited voice services are provided solely for usage between two individuals. The Telephone Company, Inc. phones and wireless phone numbers may not be used for pager or voicemail-only service, and The Telephone Company, Inc. may terminate any account if usage is limited to pager service or voicemail retrieval service.

You agree not to use The Telephone Company, Inc. service in any way that is illegal, fraudulent or abusive, as determined by The Telephone Company, Inc. at its sole discretion. You may not alter any of the hardware or software on your phone for any purpose. The Telephone Company, Inc. phones may not be purchased in bulk or sold to third parties, they are for individual use only by the Lifeline recipient who signed the agreement for service.

The Telephone Company, Inc. operates on the AT&T wireless network and is limited to AT&T coverage area. Quality of service may be affected by conditions beyond our control. These conditions include, but are not limited to atmospheric, geographic, or topographic conditions, or by damage you cause to your mobile phone. We do not warrant or guarantee that service will be available at any specific time or geographic location, or that service will be provided without interruption. We may give credit for continuous service interruption of more than 24 hours on a case-by-case basis, if such interruption was reasonably within our control, and you notify The Telephone Company, Inc. at (405)752-5900 or (866)441-2144 within seven days of the interruption.

Unused minutes and messages as part of a monthly plan expire at the end of your monthly period and may not be used in subsequent months and may not be transferred or assigned to any third party.

Account Status

Your account will remain active as long as you meet the eligibility standards for The Telephone Company, Inc. service and continue to pay your monthly bill. You are responsible for notifying The Telephone Company, Inc. if you no longer meet the Lifeline eligibility standards for The Telephone Company, Inc., by calling us at (405)752-5900 or (866)441-2144. If you do not pay for your monthly bill your service will be terminated after 60 days of inactivity.

If you receive a request from The Telephone Company, Inc. asking that you confirm your

eligibility status, you must do so within 30 days after you receive such notice in order for your service not to be terminated

.

Payment Methods for Services

Payments options for your convenience are;

- ✓ Visit any Cashland location to pay your bill in person. A list of locations can be found at www.ttcok.com or by calling us at (405)752-5900 or (866)441-2144.
- ✓ Call The Telephone Company, Inc. to pay over the phone with a credit or debit card (fee may apply) at (405)752-5900 or (866)441-2144.
- ✓ Pay online via our website at www.ttcok.com by clicking on the "pay my Bill" tab at the top of the website.
- ✓ Send a money order to The Telephone Company, Inc. at 10417 N. May Ave., Oklahoma City, OK 73120. We do NOT accept checks or cash.

The Telephone Company, Inc. collects all applicable Federal and local taxes required. Changes to a tax or surcharge will become effective as provided by the appropriate taxing authority and changes to applicable contribution amounts for Federal Universal Service Fund, FUSF, will apply. Taxes and fees are subject to change without notice.

International Calling

All service plans include unlimited local and long distance calls within the United States. International calling is available with some of our plans and is subject to certain countries, limited minutes, and/or miscellaneous restrictions. Details about the international calling can be provided by calling The Telephone Company, Inc. at (405)752-5900 or (866)441-2144.

Text Messages

The Telephone Company, Inc. has two rate plans that allow for unlimited text messages. Unlimited is deemed to be reasonable numbers of messages, and is not meant to be defined as excessive or extreme text quantities. Excessive use of the text messaging feature could result in service being turned off for abuse.

Unsolicited Messages

If you are found to be sending spam from your Telephone Company, Inc. phone, we may terminate your service without further notice.

The Telephone Company, Inc. may send messages to your phone via text message. Your monthly bill will be sent via text message.

Data Services

You may purchase a service plan that includes access to the world-wide web/internet. The Telephone Company, Inc., at its sole discretion, may interrupt or suspend access due to abuse, excessive use, or violations of the Terms and Conditions of Service.

You may check your expiration date at any time at no charge by dialing *777# + CALL and check your data balance by dialing *777*1+CALL from your mobile phone.

Roaming

The Telephone Company, Inc.'s service will not work if you are out of a coverage area. Our service will not allow you to roam; you will not have service when in a roaming area.

Billing Errors

If you think that there has been an error in any charge to your account, you must notify us immediately. Please call The Telephone Company, Inc. at (405)752-5900 or (866)441-2144 to discuss the possible or suspected error on your account. If you do not notify us within a thirty day period of the error, you waive any right to dispute the charge, including in arbitration or a court proceeding. If we determine that the disputed charge was inappropriate, your account will be credited or you may receive a refund. If you agree to a credit or refund, you are in agreement that this action has settled the dispute.

If we have attempted to charge your credit card for a charge that we deem is authorized and valid under these Terms of Service, and the credit card company withholds such payment because the charge has been disputed as a chargeback by you, the customer, we reserve the right to terminate your service until we receive proper payment for the service.

Monthly Service Charge

Monthly charges are non-refundable. Once you have paid for your service The Telephone Company, Inc. has incurred the cost for the thirty day expense of that service and a refund will not be available.

Equipment Returns

The cost of mobile phones purchased directly from The Telephone Company, Inc., are non-refundable. If you experience issues with your phone, please contact The Telephone Company, Inc. at (405)752-5900 or (866)441-2144 and we will do our best to trouble shoot the problem with you. If you have a phone that is determined defective within forty-eight hours of purchase and the equipment is returned in its original packaging with no apparent damage we may exchange the phone for a new phone of equal value. We reserve the right to refuse any one within the forty-eight hour period that has obvious damage that was caused after the phone was purchased.

Lost or Stolen Equipment

If your mobile phone is lost or stolen you are responsible for charges incurred until you notify us of the loss of your mobile phone by calling The Telephone Company, Inc. at (405)752-5900 or (866)441-2144. Upon receiving notice that your mobile phone is lost or stolen, The Telephone Company, Inc. will suspend your account. If you do not either activate a new Telephone Company, Inc. phone or notify us that you have found your old mobile phone within 60 days of the suspension of your account, your account will be deactivated and you will lose your Telephone Company, Inc. phone number.

Warranties

We do not manufacture our mobile phones or other equipment. The only warranties applicable to such devices or equipment are those extended by the distributor. We have no liability, therefore, in connection with mobile phones and other equipment malfunctions or for manufacturers' acts or omissions.

Mobile Phone Number

The mobile phone number we provide for your use is and will remain the property of The Telephone Company, Inc. If you cancel your service with The Telephone Company, Inc. in order to use another mobile service we reserve the right to assign the mobile phone number to another customer. You do have the option to port (transfer) your phone number to another wireless provider if your account is current and active.

Suspension or Termination of Service

We reserve the right to suspend or terminate your access to our service at any time should we determine, at our sole discretion, that you have violated these Terms of Service or any other rule or policy of The Telephone Company, Inc.

Privacy

The Telephone Company, Inc. is not responsible for the content or security of voicemail, messages or contact lists you create. You may create a password to access your voicemail that will add a level of security.

We recommend you always use your device in a safe manner that does not create a risk to your safety or the safety of others around you. While driving, always use a hands-free device and never use your mobile phone to send text messages while driving. Please use your Telephone Company, Inc. phone in accordance with all applicable laws and regulations.

Use of Customer Information

In order to provide service to you, we may collect certain information made available to us solely based on our relationship with you, including information regarding the nature and type of your service and the calls that you place and receive. We will always handle this data, Customer Proprietary Network Information ("CPNI"), in accordance with Federal Communications Commission regulations, Federal consumer privacy laws and The Telephone Company, Inc. Privacy Policy. We take reasonable steps to protect CPNI and your other personal information from unauthorized use or disclosure.

To comply with appropriate legal process, The Telephone Company, Inc. may disclose to law enforcement authorities and governmental agencies any information, including your name, account history, account information, or other transmission data, properly requested by law enforcement.

Dispute Resolution

The Telephone Company, Inc. and you, our customer, agree to contact one another first, with any disputes. You must contact us with any dispute by calling The Telephone Company, Inc. at (405)752-5900 or (866)441-2144 and provide a description of the problem as well as all relevant documents/information and what you would propose as a resolution. We each agree to negotiate in good faith to resolve any dispute.

No Trial by Jury

To the extent permitted by law, if a claim proceeds in court, we each also waive any right that we may have to trial by jury in any lawsuit or other proceeding. Unless otherwise specified herein, any disputes of a legal nature, whether a claim, complaint, arbitration demand or otherwise, shall be subject to the exclusive jurisdiction of the Federal or State courts located within Oklahoma County, Oklahoma.

Limitation of Liability

Unless prohibited by law, The Telephone Company, Inc. and you agree to limit claims for damages or other monetary relief against each other to direct and actual damages. You agree that The Telephone Company, Inc. and its business partners are not liable to you or any third party for any indirect, special, incidental, consequential, exemplary or punitive damages of any kind, including lost profits (regardless of whether we have been notified that such loss may occur) by reason of any act or omission in our provision of products or services or under any legal theory, including fraud, misrepresentation, breach of contract, personal injury, product liability or any other theory. The Telephone Company, Inc. assumes no risk or responsibility for your use of any of the content provided as part of our services. You acknowledge that no fiduciary or other special relationship exists between you and The Telephone Company, Inc., by virtue of these Terms and Conditions of Service or your use of The Telephone Company, Inc. phones and services. You also agree we are not liable for missed voice mails, deletion of contacts from your address book, data content, or messages from your voicemail system.

Indemnification

You agree to indemnify and hold harmless The Telephone Company, Inc. and its affiliates and their respective officers, agents, partners and employees, from any and all liabilities, settlements, penalties, claims, causes of action and demands brought by third parties (including any costs, expenses or attorneys' fees on account thereof), resulting from your use of The Telephone Company, Inc. products and services, or another person whom you authorize to use your products or services, whether based in contract or tort (including strict liability) and regardless of the form of action.

Terms and Conditions of Service

These Terms and Conditions of Service supersede all oral or written communications and understandings between you and The Telephone Company, Inc. with respect to our products and services and the terms under which they are offered and provided to you.

The Telephone Company, Inc.

As set forth in 47 CFR § 54.202 (a) (2) The Telephone Company, Inc. operates utilizing the AT&T network and is able to function in emergency situations. The AT&T network has a reasonable amount of back-up power to ensure functionality without an external power source. The network is able to reroute traffic around damaged facilities and is capable of managing spikes that occur as a result of emergency situations.

Samantha Bentson, President