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April 1, 2016

VIA ECFS

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

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

Dear Ms. Dortch:

On March 8, 2012, Global Connection Inc. of America (Global Connection or Company) submitted its Compliance Plan for wireless Lifeline services, outlining the measures it would take to implement the conditions imposed by the Commission in its 2012 Lifeline Reform Order.¹ Following revisions, most recently on April 30, 2012, the Commission approved Global Connection's Compliance Plan on May 25, 2012.²

Pursuant to discussions with Wireline Competition Bureau (Bureau) staff, Global Connection now seeks expedited approval within thirty days of the attached amended Compliance Plan which has been updated to: (1) reflect a proposed change in ownership of the

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) (2012 Lifeline Reform Order).

² See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

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Company; (2) include Global Connection's wireline Lifeline services³; and (3) update the information provided in the approved Compliance Plan due to the passage of time.

McCright Transaction

Pursuant to the terms of a Stock Purchase Agreement (Agreement) dated November 16, 2015 and following regulatory approvals,⁴ majority indirect ownership of Global Connection will be transferred to Stan McCright, a U.S. citizen and a well-regarded consultant in the field of public housing. Global Reconnect, a Delaware holding company established by Mr. McCright, will acquire 100 percent of the stock in Global Connection, which will become its wholly-owned direct subsidiary. A majority 82.5 percent interest in Global Reconnect (and thus, the majority indirect interest in Global Connection) will be held post-close by Stan McCright. At the same time, the Company's current immediate parent, Global Holdings will acquire preferred stock in Global Reconnect, representing approximately 17.5 percent ownership of Global Reconnect, and resulting in an indirect 17.5 percent interest in Global Connection.⁵

Stan McCright and his company, McCright & Associates, have worked as a partner to public housing authorities throughout the nation for over two decades, building systems to efficiently manage eligibility determinations and re-certifications for residents in public housing. The McCright team has conducted inspections and re-certifications throughout the United States, setting and maintaining a high standard for compliance management. The combination of Global Connection's Lifeline experience and the McCright expertise in designing and implementing reliable, efficient compliance programs in the low-income housing sector offers synergies that will benefit not only Global Connection but its Lifeline customers in each of the states it serves. In addition, as the co-owner of McCright & Associates, LLC, the full owner of McCright Marketing, LLC and the holder of substantial interests in several other business ventures, Stan

³ The Company filed a proposed Compliance Plan for its wireline Lifeline services on June 26, 2012, with subsequent revisions on September 17, 2012. At this time, that plan remains pending.

⁴ Global Connection filed its Domestic and International Section 214 Application for the Transfer of Control of Global Connection to Global Reconnect, Inc. on February 4, 2016. The Wireline Competition Bureau issued a Public Notice on February 16, 2016. *See Domestic Section 214 Application Filed for the Transfer of Control of Global Connection Inc. of America to Global Reconnect, Inc.*, WC Docket No. 16-30, Public Notice (Feb. 16, 2016). The domestic application was granted, effective March 18, 2016. The International Bureau placed the application on public notice on February 26, 2016. *See Streamlined International Applications Accepted for Filing: Section 214 Applications (47 C.F.R. § 63.18); Section 310(b) Requests*, Report No. TEL-01777S (Feb. 26, 2016). The international application was granted, effective March 11, 2016.

⁵ The transaction will not result in any change to the ownership of Global Holdings. Majority direct interests in Global Holdings will continue to be held by L6-Global. Milestone Partners will continue to hold ultimate control of Global Holdings.

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McCright has established considerable financial resources that will be available, as needed, to support Global Connection in its operations and in its ability to reach and provide compelling service offerings to Lifeline eligible consumers.

Global Connection's current management team will remain with the Company, continuing to direct day-to-day operations. This will ensure that their collective expertise in the telecommunications field and specific in-depth knowledge of Global Connection will guide the Company's decisions going forward. With the change in ownership, however, Global Connection will also benefit from Stan McCright's depth of experience in public benefit program management. As a result, the transaction will bring together the full strength of Global Connection's proven telecommunications capabilities and Stan McCright's business expertise, particularly with respect to compliance and marketing in the low-income consumer sector. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive and effectively serve Lifeline eligible consumers.

Details of the proposed transaction, including the new ownership structure and discussion of the financial and technical resources of the new ownership and the public interest benefits of the transaction are provided in footnote 1 on page 1 and Section III (pp. 28-30) of the revised Compliance Plan.

Wireline Lifeline Operations

Global Connection has operated as a provider of domestic and international wireline telecommunications services since 1998. The Company currently provides prepaid wireline local exchange and long distance services to residential customers in 26 states.⁶ The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in seven states⁷ where it has held these designations since before the 2012 Lifeline Reform Order. Global Connection also makes wireline Lifeline services available in eleven states where it does not hold a wireline ETC designation by reselling AT&T Lifeline service.⁸

Global Connection is dedicated to growing its wireline operations. Indeed, Global Connection is near the completion of a transaction through which it has acquired approximately

⁶ Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, North Carolina, Nebraska, New Mexico, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, Washington, Wisconsin, and West Virginia.

⁷ Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina.

⁸ Illinois, Indiana, Kansas, Kentucky, Mississippi, Missouri, Ohio, South Carolina, Tennessee, Texas and Wisconsin.

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8,700 wireline (Lifeline and non-Lifeline) customers in 19 states from Budget Prepay, Inc.⁹ At this time, the Company provides wireline Lifeline service to approximately 11,750 subscribers. In an industry increasingly turning to mobile services, Global Connection's continued provision of wireline Lifeline service represents a rare and significant choice in service providers for low-income consumers.

The Company's continued ability to provide wireline Lifeline services to many of its current customers depends upon expeditious review and approval of this revised Compliance Plan. Nearly 5,000 of the Company's wireline Lifeline customers, located in 11 states, are served by the Company through resale of an underlying carrier's Lifeline services. In the Lifeline Second Report and Order released on June 22, 2015, the Commission determined "that only ETCs that provide Lifeline service directly to subscribers will be eligible for reimbursement from the Fund."¹⁰ The Commission provided a 180-day transition period following the effective date of the order "during which non-ETC resellers may...obtain ETC status..."¹¹ That transition period ends on August 15, 2016 by which time Global Connection must have obtained ETC designations to continue to serve wireline Lifeline customers in these 11 states or must have completed the necessary procedures to discontinue provision of Lifeline discounts to those customers, which may require regulatory approvals and/or advance notice (as much as 60 days ahead).

Approval of this amended Compliance Plan is a requirement to obtain that approval – and in many states is a threshold ("gating") requirement even to file the ETC designation petition. Consequently, to comply with the Commission's determination in the Second Report and Order that all Lifeline customers shall be served directly by designated ETCs (and not by Lifeline resale), and at the same time avoid terminating essential Lifeline discounts for thousands of subscribers, Global Connection requests expeditious approval of the enclosed Compliance Plan ***within thirty days*** in order to meet the following timeline:

April 1, 2016

Proposed amended Compliance Plan filed with Bureau

⁹ See *Domestic Section 214 Application Filed for the Acquisition of Certain Assets of Budget PrePay, Inc. d/b/a Budget Phone by Global Connection Inc. of America*, Notice of Domestic Section 214 Authorization Granted, WC Docket. No. 15-258 (Nov. 30, 2015).

¹⁰ *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) (Second Report and Order or Order on Reconsideration).

¹¹ *Id.* This portion of the Order has been approved by the Office of Management and Budget and was published in the Federal Register on February 17, 2016. See 81 Fed. Reg. 7999 (Feb. 17, 2016).

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|-----------------|--|
| May 1, 2016 | Target deadline for Global Connection to file state wireline ETC petitions (Bureau-approved Compliance Plan is a pre-requisite for approval and, in most states, for filing) |
| August 15, 2016 | End of Lifeline provisioning via resale of underlying ETC services (Deadline for Global Connection to obtain designations) |

In support of the addition of the Company's wireline services to this Compliance Plan, the document has been updated throughout to incorporate reference to wireline operations and to identify variances from wireless procedures where they exist. Information regarding Global Connection's wireline operations and acquisition of Budget Prepay wireline customers is included at pages 3-4. Global Connection's current wireline Lifeline offerings are described in Section II (pp. 26-27) of the Compliance Plan. Discussions of the Company's 911/E911 provisioning and toll limitation service for wireline Lifeline customers are provided, respectively in pages 8-10 and Section III (pp. 31-32). Exhibits (marketing material, sample enrollment form, income eligibility worksheet) for wireline Lifeline operations are also included.

Compliance Plan Updates Due to the Passage of Time

The amended Compliance Plan has been revised to update the details of Global Connection's wireless operations and Lifeline ETC designations (see p. 2). It also incorporates revisions to Company procedures to reflect changes to Lifeline program rules since May 2012. On pages 8-9, Global Connection provides updates regarding its enrollment process. On pages 12-13, the Company discusses compliance with the new rule requiring retention of proof of eligibility documentation. On page 14, Global Connection commits to de-enrolling customers at their request within two business days. On pages 18-19, the Company updates its annual recertification practices, including sending educational messages about the recertification requirement. On pages 24-25, the Company discusses compliance with the new FCC Form 497 snapshot rule for reimbursements and updates references to the annual ETC filing requirements. On pages 12-13, the Company includes a description of how it "deals directly" with applicants through use of a real-time review queue. On page 21, Global Connection describes how it interacts with the National Lifeline Accountability Database (NLAD) and on page 25 eliminates language due to the phase out of the in-depth validation (IDV) process.¹² Further, the

¹² The language regarding cooperating with in-depth validation audits was on page 19-20 of the approved April 30, 2012 Compliance Plan. In Section III of this Amended Compliance Plan, Global Connection discloses the fact that the Company entered into a Consent Decree with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia relating to including a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund. Global Connection's ETC petition was ultimately granted and this fact was disclosed in the Company's revised wireline Compliance Plan filed with the Commission on September 17, 2012.

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discussions of enrollment and eligibility determination procedures in Section I.B. have been updated and expanded. Current exhibit materials for the Company's wireless Lifeline operations (marketing materials, sample enrollment form, income eligibility worksheet) are included.

Summary

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

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

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Ryan Palmer
Jay Schwarz
Jodie Griffin

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

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

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (Global Connection or the Company),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plan outlining the measures it will take to comply with the Commission's Lifeline rules and implement the conditions imposed by the Commission in its 2012 Lifeline Reform Order for its wireless and wireline service.² On March 8, 2012, Global Connection filed a Compliance Plan for its

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its current holding company as Global Connection Holdings Corporation (Global Holdings). Global Connection currently has no separate operating companies and no affiliates. Following the change in Global Connection's ownership proposed herein, the Company's corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies. Post-close, however, Global Connection's holding company will be Global Reconnect, Inc. a Delaware corporation. Through Global Reconnect, the Company will have an affiliate, Executone of Chattanooga, LLC d/b/a Concentric Network Solutions, LLC (Concentric). Concentric took steps in 2013 to establish itself as a wireless provider; however, Concentric's Compliance Plan filing has not been approved and Concentric did not begin providing services. At this time, Concentric remains inactive.

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6,

wireless service, which was most recently revised and re-filed on April 30, 2012. Global Connection's wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.³ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on September 17, 2012. Global Connection files this revised Compliance Plan to: reflect a proposed change in ownership of the Company; include Global Connection's wireline Lifeline services; and update the information provided herein due to the passage of time.

Global Connection provides wireless service in 24 territories⁴ and prepaid wireline local exchange and long distance services to residential customers in 26 states.⁵ The Company is designated as an ETC to provide Lifeline services to low-income consumers on a wireline basis in seven states⁶ where it has held a wireline eligible telecommunications carrier (ETC) designation since before the 2012 Lifeline Reform Order, and on a wireless basis in all 24 of its wireless service territories. The Company also makes wireline Lifeline services available in 11 states where it does not hold a

2012) (2012 Lifeline Reform Order). The Company herein submits the information required by the Compliance Plan Public Notice. *See Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) (Compliance Plan Public Notice).

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

⁴ Those 24 territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁵ Those 26 states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, North Carolina, Nebraska, New Mexico, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, Washington, Wisconsin, and West Virginia. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁶ Those seven states are: Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina.

wireline ETC designation by reselling AT&T Lifeline service.⁷ Further, Global Connection is in the process of acquiring wireline non-Lifeline and Lifeline customers in one additional state where the Company does not currently have a wireline ETC designation.⁸ It will continue to serve Lifeline customers in “non-designated” states indirectly by reselling AT&T Lifeline service until it is designated as a wireline ETC by the state or it must cease providing Lifeline discounts.

Change in Ownership of Global Connection

As noted above, Global Connection currently is wholly-owned by Global Holdings. As described in detail in Section III below, Global Holdings and Global Reconnect have entered into an agreement pursuant to which Global Reconnect will acquire all of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the majority interest holder in Global Reconnect, Stan McCright, a United States citizen, although Global Holdings will retain an indirect minority interest in Global Connection through an interest in Global Reconnect. The transaction will not result in any loss or impairment of service for any customers.

Wireline Lifeline Operations

Global Connection currently provides wireline Lifeline service to approximately 11,750 subscribers and is completing the acquisition of another 900 wireline Lifeline customers from Budget Prepay in two states. 4,976 of these Lifeline customers, located in 11 states, are served by the Company through resale of an underlying carrier’s Lifeline

⁷ Those states are Illinois, Indiana, Kansas, Kentucky, Mississippi, Missouri, Ohio, South Carolina, Tennessee, Texas and Wisconsin.

⁸ This state is Oklahoma.

services. In the Lifeline Second Report and Order released on June 22, 2015, however, the Commission determined “that only ETCs that provide Lifeline service directly to subscribers will be eligible for reimbursement from the Fund.”⁹ The Commission provided a 180-day transition period following the effective date of the order “during which non-ETC resellers may...obtain ETC status....”¹⁰ That transition period ends on August 15, 2016, at which time Global Connection must obtain ETC designations in these 11 states to serve its wireline Lifeline customers or stop providing Lifeline discounts to those customers, which may require advance notice (as much as 60 days ahead) for discontinuance of service. Global Connection is in the process of applying for ETC designation in states where it is necessary to continue to serve its customers. However, in order for the states to grant a wireline ETC designation to Global Connection (and in many cases accept or review a petition), the Bureau must first approve this revised Compliance Plan. Therefore, to effectuate the Commission’s desire in the Second Report and Order to have all Lifeline customers served directly by designated ETCs (and not by Lifeline resale), and avoid terminating essential Lifeline service to thousands of subscribers, Global Connection requests that the Bureau expedite approval of this change to its Compliance Plan.¹¹

⁹ *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) (Second Report and Order, Order on Reconsideration or Lifeline Second FNPRM).

¹⁰ *Id.* This portion of the Order has been approved by the Office of Management and Budget and was published in the Federal Register on February 17, 2016. See <http://www.usac.org/li/tools/order/resale-of-lifeline.aspx>.

¹¹ The Company’s compliance plan for wireline services has been pending since June 26, 2012.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.¹²

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order, as well as with the Commission's Lifeline rules and policies more generally.¹³ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the 2012 Lifeline Reform Order, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

¹² See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹³ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

ACCESS TO 911 AND E911 SERVICES¹⁴

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹⁵ The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services.

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

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

¹⁴ See Compliance Plan Public Notice at 3.

¹⁵ See 2012 Lifeline Reform Order ¶ 373.

CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

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

E911-Compliant Handsets. Global Connection's handsets used in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing wireless customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge. As discussed above, this requirement does not apply to Global Connection's wireline services.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁶

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules as 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;¹⁷ or (2) the household's participation in one of the federal assistance programs listed in sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database (NLAD), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

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

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is currently used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or

¹⁶ See Compliance Plan Public Notice at 3.

¹⁷ Some states set the household income threshold higher. Global Connection adheres to the standard set in each state.

computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (TPIV) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately 40 percent of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly 500 active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁸ All agents enrolling Lifeline customers for Global Connection have a portal login, which allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

¹⁸ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁹ and the address is checked against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.²⁰

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility.

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

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification requirements in the 2012 Lifeline Reform Order and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

¹⁹ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the Order on Reconsideration. *See* Order on Reconsideration ¶ 224, *supra* n. 9 at p. 4.

²⁰ *See infra* Section I.F. regarding use of the NLAD.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the 2012 Lifeline Reform Order and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² 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.²³

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

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

²³ See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

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

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.²⁶ In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Company complies with the new requirement to retain and protect proof of eligibility.²⁷ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation

²⁴ See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁶ See 2012 Lifeline Reform Order ¶ 101; 47 C.F.R. § 54.410(b)(1)(iii), 47 C.F.R. § 54.410(c)(1)(iii).

²⁷ See Order on Reconsideration ¶ 221 *supra* n. 9 at p.4; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel. In addition, a Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on an FCC Form 497 for reimbursement.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁸

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[I]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁹ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on an FCC Form 497 for reimbursement. The

²⁸ 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).

²⁹ 2012 Lifeline Reform Order ¶ 110.

Company will therefore always “deal directly” with its customers to certify and verify the customer’s Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber 30 days to demonstrate continued eligibility.³⁰ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

Although not currently required by the Commission’s rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two business days.³¹ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-511-3009 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7PM Eastern, Monday through Friday, and 10AM to 2PM Eastern on Saturday, excluding holidays.

³⁰ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³¹ See Lifeline Second FNPRM ¶ 150, *supra* n. 9 at p. 4 (proposing to require ETCs to allow subscribers to de-enroll from Lifeline service for any reason within two business days).

C. Subscriber Certifications for Enrollment

Global Connection will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the 2012 Lifeline Reform Order, together with any additional state certification requirements.³² The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³³ Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³⁴ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁵

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a

³² 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

³³ See Model Application/Certification Forms, included as **Exhibit A**. See Compliance Plan Public Notice at 3.

³⁴ See Income Eligibility Worksheet, included as **Exhibit B**.

³⁵ See 2012 Lifeline Reform Order ¶ 123.

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.³⁶

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.³⁷

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁸); (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

³⁶ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁷ See 47 C.F.R. § 54.405(c).

³⁸ See 2012 Lifeline Reform Order ¶ 87.

(8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁹

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,⁴⁰ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the

³⁹ See 47 C.F.R. § 54.410(d)(2).

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴¹ 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.⁴²

D. Annual Verification Procedures

Global Connection annually re-certifies all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and section 54.410(d) of the Commission's rules. This certification 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.⁴³ 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

⁴¹ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

⁴² See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

⁴³ See 2012 Lifeline Reform Order ¶ 120.

respond, he or she will be de-enrolled in the program.⁴⁴

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the 30 days, the Company de-enrolls the subscriber within five business days.⁴⁶

E. Activation and Non-Usage

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

⁴⁴ See 2012 Lifeline Reform Order ¶ 145.

⁴⁵ See 2012 Lifeline Reform Order ¶ 142; 47 C.F.R. § 54.54.405(e)(4).

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

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

directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

In addition, after service activation, the Company will provide a de-enrollment notice to wireless 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.⁴⁸ 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; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.⁴⁹

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. Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁵⁰

Global Connection’s wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection’s wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁵¹

⁴⁸ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.405(e)(3).

⁴⁹ See 2012 Lifeline Reform Order ¶ 261; 47 C.F.R. § 54.407(c)(2).

⁵⁰ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.405(e)(3).

⁵¹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

Database. The Company complies with the requirements of the NLAD and section 54.404 of the Commission's rules. As such, the Company queries the NLAD for every enrollment⁵² 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.⁵³

In addition to checking the NLAD, Company personnel emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission's and Global Connection's rules and policies by completing the Company's Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every 90 days. Further, Global

⁵² With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵³ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber's information in the NLAD within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵⁴ through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵⁵ 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

⁵⁴ 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* 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵⁵ *See* 2012 Lifeline Reform Order ¶ 78.

required one-per-household certification (*i.e.*, de-enrollment).⁵⁶

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 the ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁷ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁸ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁹ Samples of the Company's marketing materials are included as **Exhibit C**. In addition, the Company's application/certification forms will state that consumers who willfully make a false

⁵⁶ *Id.* The USAC Household Worksheet is available at <http://www.lifelinesupport.org/ls/eligibility/default.aspx#household>.

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

⁵⁸ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁹ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements From the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁶⁰ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision of Lifeline support when the revised section 54.407 goes into effect.⁶¹ In addition, the Company will keep accurate records as directed by USAC⁶² and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, certifying the Company's business and affiliate information, and terms and conditions of any voice telephony plans offered to Lifeline subscribers.⁶³ The Company also submits an annual Form 555 filing to the Commission certifying, under

⁶⁰ See *2012 Lifeline Reform Order* ¶ 128; 47 C.F.R. § 54.407(d).

⁶¹ See Second Report and Order ¶¶ 238-243, *supra* n. 9 at p. 4. The effective date is August 15, 2016. Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶² See 47 C.F.R. § 54.407(e).

⁶³ See 47 C.F.R. § 54.422.

penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; and (2) that the Company is in compliance with all federal Lifeline certification procedures.⁶⁴ The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission’s rules, annually by January 31st, for its re-certification efforts of the previous year.⁶⁵

II. Description of Lifeline Service Offerings⁶⁶

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁷ and throughout the coverage area of its respective, underlying provider(s).

The Company’s current wireless Lifeline offering consists of a 250 anytime minutes talk and text plan without rollover (one minute of talk time = one text).⁶⁸ Lifeline customers can purchase additional bundles of minutes in denominations of \$5 (40 minutes), \$10 (100 minutes), \$20 (250 minutes), \$30 (500 minutes) and \$50 (1000 minutes). Airtime “top-up” minutes are available for purchase at the Company’s retail locations, through customer service and on its website. Global Connection will revise its Lifeline plans as necessary to comply with any minimum standards that are set by the

⁶⁴ See 47 C.F.R. § 54.416(a).

⁶⁵ See 47 C.F.R. § 54.416(b).

⁶⁶ See Compliance Plan Public Notice at 3.

⁶⁷ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina.

⁶⁸ The Company has a small (and diminishing) number of wireless Lifeline customers that continue to subscribe to a previously offered Lifeline plan consisting of 100 anytime minutes per month, plus 100 anytime text messages, with rollover, at no charge. The Company has not transitioned these customers to the 250 minute plan because the 100 minute plan includes rollover and the 250 minute plan does not.

Commission.

In addition to free voice services, Global Connection's current wireless Lifeline service plan includes a free handset and custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

Additional information regarding the Company's wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company's wireline Lifeline offerings vary based on the Company's underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁶⁹ for \$20.70,⁷⁰ an Advantage Package⁷¹ for \$25.70 and a Premium Package⁷² for \$30.70 to eligible Lifeline customers. Global Connection resells CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷³ for \$32.95 and an Advantage Package⁷⁴ for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia and North Carolina, and offers a Lifeline-discounted Basic

⁶⁹ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁰ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁷² The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷³ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁴ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

Package⁷⁵ for \$36.70 and an Advantage Package⁷⁶ for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁷ for \$36.70 and an Advantage Package⁷⁸ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

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

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁹

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁸⁰ The Compliance Plan Public Notice requires that a carrier's compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the

⁷⁵ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁶ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁷ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁸ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁹ See Compliance Plan Public Notice at 3.

⁸⁰ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

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.

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

Pursuant to the terms of a Stock Purchase Agreement (Agreement) dated November 16, 2015, by and among Global Reconnect, Global Holdings and Global Connection, and following regulatory approvals,⁸¹ Global Reconnect will acquire 100 percent of the stock in Global Connection, which will become its wholly-owned direct subsidiary. A majority 82.5 percent interest in Global Reconnect (and thus, the majority

⁸¹ Global Connection filed its Domestic and International Section 214 Application for the Transfer of Control of Global Connection to Global Reconnect, Inc. on February 4, 2016. The Wireline Competition Bureau issued a Public Notice on February 16, 2016. *See Domestic Section 214 Application Filed for the Transfer of Control of Global Connection Inc. of America to Global Reconnect, Inc.*, WC Docket No. 16-30, Public Notice (Feb. 16, 2016). The domestic application was granted, effective March 18, 2016. The International Bureau placed the application on public notice on February 26, 2016. *See Streamlined International Applications Accepted for Filing: Section 214 Applications (47 C.F.R. § 63.18); Section 310(b) Requests*, Report No. TEL-01777S (Feb. 26, 2016). The international application was granted, effective March 11, 2016.

indirect interest in Global Connection) will be held post-close by Stan McCright, a U.S. citizen. At the same time, Global Holdings will acquire preferred stock in Global Reconnect, representing approximately 17.5 percent ownership of Global Reconnect, and resulting in an indirect 17.5 percent interest in Global Connection.⁸²

Stan McCright and his company, McCright & Associates, have worked as a partner to public housing authorities throughout the nation for over two decades, building systems to efficiently manage eligibility determinations and re-certifications for residents in public housing. The McCright team has conducted inspections and recertifications throughout the United States, setting and maintaining a high standard for compliance management. The combination of Global Connection's Lifeline experience and the McCright expertise in designing and implementing reliable, efficient compliance programs in the low-income housing sector offers synergies that will benefit not only Global Connection but also its Lifeline customers in each of the states it serves. In addition, as the co-owner of McCright & Associates, LLC, the full owner of McCright Marketing, LLC and the holder of substantial interests in several other business ventures, Stan McCright has established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in twenty-seven jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Moreover, with the change in ownership, Global Connection's own

⁸² The transaction will not result in any change to the ownership of Global Holdings.

competence in this regard will benefit from a major infusion of expertise in management of government benefit program compliance. Global Connection's current management team will remain with the Company, continuing to direct day-to-day oversight of the operations. This will ensure that their collective expertise in the telecommunications compliance field and specific in-depth knowledge of Global Connection will guide the Company's decisions going forward and its adherence to this revised Compliance Plan. Stan McCright and additional team members will bring to this foundation of experience decades of experience in public benefit program management. As a result, the transaction will bring together the full strength of Global Connection's proven telecommunications capabilities and Stan McCright and additional team members' business expertise, particularly with respect to compliance and marketing in the low-income consumer sector. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸³ Global Connection agreed to pay a civil penalty in the

⁸³ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit D**.

amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸⁴ Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸⁵ The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set of minutes of use at no charge to the customer, and can be used for local and domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

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

⁸⁴ Compliance Plan Public Notice at 3.

⁸⁵ See 47 C.F.R. § 54.202(a)(1).

Finally, Global Connection will not provide toll limitation service (TLS) for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸⁶

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

IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Commission's 2012 Lifeline Reform Order, the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this Compliance Plan is essential to allow Global Connection to obtain the ETC designations necessary to effectuate the Commission's desire in the Second Report and Order to have all Lifeline customers served directly by designated ETCs (and not by Lifeline resale), and avoid

⁸⁶ See 2012 Lifeline Reform Order ¶ 230.

terminating essential Lifeline discounts for thousands of subscribers. Moreover, approval of this Compliance Plan is required as well in order for Global Connection to consummate the ownership change described herein, which will demonstrably strengthen the Company's operating capabilities to the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan
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Suite 400
Washington, D.C. 20007
(202) 342-8544

*Counsel to Global Connection Inc. of
America*

April 1, 2016

Exhibit A

Model Application/Certification Forms

- A-1 Wireless**
- A-2 Wireline**

A-1 Wireless

FREE PHONE CALLS
250 SLIMM TALK & TEXT



Welcome and thank you for your interest in being a **StandUP WirelessSM customer!**



IMPORTANT INFORMATION

PLEASE READ CAREFULLY

IDENTIFICATION



Please have your state-issued ID (drivers license or ID card) ready to show at sign-up.

PROOF OF ELIGIBILITY

If you participate in government assistance programs, present proof and you may be eligible for the StandUP Wireless Lifeline program.



PROTECT YOUR PERSONAL DATA



The privacy and security of your personal information is very important to us. Please be sure to keep your personal information private until needed for sign-up. We do not share your personal information in ways not disclosed or without your authorization.

ACKNOWLEDGEMENT



You agree to have your information submitted electronically by a StandUP Wireless Representative. Please read the application form on the reverse side that you will be asked to sign electronically upon activation.

NON-USAGE & RECERTIFICATION POLICIES



You must place a call from your StandUP Wireless phone once every 60 days to avoid termination of service and de-enrollment. We recommend you use your phone a minimum of once a month. **IF APPROVED THIS CERTIFICATION WILL REMAIN ACTIVE FOR ONE (1) YEAR AND MUST BE RECERTIFIED ANNUALLY. PLEASE RETAIN FOR YOUR RECORDS**

TOP-UP YOUR MINUTES OR PLAN

TOP-UP YOUR MINUTES FOR AS LOW AS **5¢** per minute!

MINUTES	PRICE
50	\$5.00
125	\$10.00
250	\$20.00
500	\$30.00
1000	\$50.00

*taxes and fees are extra.

ONLINE & CUSTOMER CARE
www.StandUPWireless.com
1-800-544-4441

We accept:

PAYMENT LOCATIONS

STEP-UP YOUR PLAN

StandUP 250 Lifeline Plan	FREE Reloads Every Month • 250 Anytime Voice or Text Units
StandUP 500 Lifeline Plan	ONLY \$14.95* Per Month • 500 Anytime Minutes • 500 Text Messages
StandUP UNLIMITED Lifeline Plan	ONLY \$34.95* Per Month • Unlimited Minutes • 1000 Text Messages

StandUP Non-Lifeline plans can also be purchased for the stated price above plus \$12.75 per month.

THIS CERTIFICATION WILL REMAIN ACTIVE FOR ONE (1) YEAR AND MUST BE RECERTIFIED ANNUALLY. PLEASE RETAIN FOR YOUR RECORDS

IMPORTANT LIFELINE WIRELESS SERVICE INFORMATION:

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wire line and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. You must use your phone to continue to receive service. Should you not use your service for 60 days you will be de-enrolled. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits. Eligible Lifeline Subscribers will receive a free handset with calling features and receive 100 Anytime Minutes each month of service with rollover OR 250 Anytime Calling Units each month of service without rollover OR receive a discount from any premium plan.

LIFELINE ELIGIBILITY CRITERIA

Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, KS, MI, NM, OH, TX, VT
Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY	



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

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

I hereby certify that I have read and understood the disclosures listed above. I hereby certify that to the best of my knowledge, my household is not already receiving a Lifeline service benefit. OR I hereby certify that I am receiving Lifeline benefits from another carrier; however, with this application I would like to transfer my benefits to StandUp. I understand the change will change my existing mobile number.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

<input checked="" type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)	<input type="checkbox"/> Temporary Assistance for Needy Families (TANF)	<input type="checkbox"/> Senior citizen low-income discount plan offered by the local gas or power company
<input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA)	<input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP)	
<input type="checkbox"/> Medicaid (not Medicare)	<input type="checkbox"/> National School Lunch Program's free lunch program	
<input type="checkbox"/> Supplemental Security Income (SSI)	<input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines	

Tribal eligibility: I hereby certify that I reside on Federally-recognized Tribal lands. Unresolved questions or complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 1-800-282-5813.

Customer Application Information:

First Name: JOHN Middle Name: DEE Last Name: CUSTOMER

Date of Birth: Month: MARCH Day: 14TH Year: 1972 Last Four Digits of Social Security Number or Tribal ID Number: 1234

If Qualifying for Lifeline by Income, number of Individuals in Household: _____ Home Telephone Number (if available): 123-456-7891

Residential Address (P.O. Box NOT sufficient) Address is (choose one): Permanent Temporary Contact Number: 123-456-7891

Number: 123 Apt: C Street: HOME STREET City: MYCITY State: GA Zip Code: 30325

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) Email: JCUST@HOTMAIL.COM

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Multiple households sharing an address:

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

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling 1.877.283.3890. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

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

Authorizations:

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

If Qualifying person is different (Example: Child on School Lunch):

Name of qualifying individual

(if different than applicant; if different see Additional Certifications):

The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

Additional certifications. I hereby certify, under penalty of perjury, that (Check the box next to each line):

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

Applicant's Signature: JOHN CUSTOMER **Date:** 05/23/2013

FOR AGENT USE ONLY (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> The prior year's state, federal, or Tribal tax return, | <input type="checkbox"/> A Veterans Administration statement of benefits, | <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or | If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months. |
| <input type="checkbox"/> Current income statement from an employer or paycheck stub, | <input type="checkbox"/> A retirement/pension statement of benefits | <input type="checkbox"/> A divorce decree, child support award, or other official document. | |
| <input type="checkbox"/> A Social Security statement of benefits, | <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, | | |

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

List A - Choose 1

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Section 8 Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)

- Senior citizen low-income discount plan offered by the local gas or power company

List B - Choose 1:

- Program participation card/document
- Prior year's statement of benefits
- Notice letter of participation
- Other official document evidencing participation _____

Last 4 digits of Doc / ID# from List B

1234

Date of Proof Document:

05 / 23 / 2012

Expiration Date of Proof Document:

08 / 10 / 2014

Applicant Account Number: 123456789 Agent/Dealer Number: 123-5564-32

A-2 Wireline



A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.
One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

- I hereby certify that I have read and understood the disclosures listed above.
I hereby certify that to the best of my knowledge, my household is not already receiving a Lifeline service benefit.
OR
I hereby certify that I am receiving Lifeline benefits from another carrier; however, with this application I would like to transfer my benefits to Global Connection Inc. of America. I understand the change will change my existing phone number.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

- Supplemental Nutrition Assistance Program (SNAP)
Section 8 Federal Public Housing Assistance (FPHA)
Medicaid (not Medicare)
Supplemental Security Income (SSI)
Temporary Assistance for Needy Families (TANF)
Low Income Home Energy Assistance Program (LIHEAP)
National School Lunch Program (free program only)
Income at or below 135% of Federal Poverty Guidelines
Senior citizen low-income discount plan offered by the local gas or power company

Tribal eligibility: I hereby certify that I reside on Federally-recognized Tribal lands. Unresolved questions or complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 1-800-282-5813.

Customer Application Information:

First Name Middle Name Last Name

Date of Birth: Month Day Year Last Four Digits of Social Security Number or Tribal ID Number:

If Qualifying for Lifeline by Income, number of individuals in Household: Home Telephone Number (if available):

Residential Address (P.O. Box NOT sufficient) Address is (choose one): Permanent Temporary Contact Number

Number: Apt: Street: City: State: Zip Code:

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) Email:

Number: Apt: Street: City: State: Zip Code:

Multiple households sharing an address:

- I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses.
Letter of Authorization: This letter is a written authorization, to designate Global Connection Inc. of America to act as my agent in order to change the following: long distance carrier from my current telecommunications carrier to Global Connection Inc. of America long distance service, local exchange carrier from my current telecommunications carrier to Global Connection Inc. of America, I am authorized to request changes on this account. I further understand that there may be a charge for each provider change and could involve a charge for the changing back to the original primary carrier. Subscribers selecting the electronic signature option and or the IVR (Interactive Voice Response) to be considered a "writing", any name or symbol of subscriber affixed to or contained in the electronic Letter of Authorization shall be deemed to be the Subscriber's valid signature expressing intent to be bound to this Letter of Authorization and the applicable tariffs.

Authorizations:

- I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including 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.

If Qualifying person is different (Example: Child on School Lunch):

Name of qualifying individual

(if different than applicant; if different see Additional Certifications):

- The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

Additional certifications. I hereby certify, under penalty of perjury, that (Check the box next to each line):

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

Applicant's Signature:

Date:

FOR AGENT USE ONLY (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

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

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

List A - Choose 1

- Supplemental Nutrition Assistance Program (SNAP)
Medicaid
Section 8 Federal Public Housing Assistance (FPHA)
Supplemental Security Income (SSI)
Temporary Assistance for Needy Families (TANF)
Low Income Home Energy Assistance Program (LIHEAP)

- Senior citizen low-income discount plan offered by the local gas or power company
National School Lunch Program (free program only)

List B - Choose 1:

- Program participation card/document
Prior year's statement of benefits
Notice letter of participation
Other official document evidencing participation

Last 4 digits of Doc / ID# from List B

Date of Proof Document:

Expiration Date of Proof Document:

Applicant Account Number:

Agent/Dealer Number:

Exhibit B

Income Eligibility Worksheet



AZ, KS, MI, NM, OH, TX & VT*

Individuals are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 150% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

*Vermont individuals over the age of 65.

HOUSEHOLD SIZE	INCOME LEVEL
1	\$17,820
2	\$24,030
3	\$30,240
4	\$36,450
5	\$42,660
6	\$48,870
7	\$55,095
8	\$61,335
For each additional person	Add \$6,240

All Other Contiguous States and DC**

Individuals in these states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

**Excluding CA.

HOUSEHOLD SIZE	INCOME LEVEL
1	\$16,038
2	\$21,627
3	\$27,216
4	\$32,805
5	\$38,394
6	\$43,983
7	\$49,586
8	\$55,202
For each additional person	Add \$5,616

Effective 1-26-2016

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- The prior year's state, federal, or Tribal tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document
- If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months

This is a Lifeline service provided by Global Connection Inc. of America. Lifeline 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. Consumers 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 non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.

IMPORTANT

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. You must use your phone to continue to receive service.** Should you not use your service for 60 days you will be de-enrolled. **Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll.** Proof may consist of eligible program card or statement of benefits. Eligible Lifeline Subscribers will receive a free handset with calling features and receive 100 Anytime Minutes each month of service with rollover OR 250 Anytime Calling Units each month of service without rollover OR receive a discount from any premium plan.

LIFELINE WIRELESS SERVICE INFORMATION:

LIFELINE ELIGIBILITY CRITERIA Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LIHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR.	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, KS, MI, NM, OH, TX, VT
Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, WA, WV, WI, WY.	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY	

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities Commission Consumer Affairs at 303-894-2070 or 800-456-0858	Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 800-282-5813	Kansas Commission's Office of Public Affairs and Consumer Protection at 785-271-3140 or 800-662-0027 TDD 800-766-3777	Massachusetts Consumer Division Dept. of Telecommunications & Cable 617-305-3531 or 800-392-6066
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Exhibit C
Marketing Materials

C-1 Wireless
C-2 Wireline

C-1 Wireless



FREE*

**CELL PHONE
& FREE ACTIVATION**

250

MINUTES OR TEXTS

**EACH MONTH.
EVERY MONTH.**

OR

100 ANYTIME MINUTES + 100 TEXT MESSAGES

WITH ROLLOVER

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public
Utilities Commission
Consumer Affairs at
303-894-2070 or
800-456-0858

Georgia Public Service
Commission's Consumer
Affairs Unit at
404-656-4501 or
1-800-282-5813

Kansas Commission's
Office of Public Affairs
and Consumer Protection
at 785-271-3140 or
800-662-0027
TDD 800-766-3777

Massachusetts Consumer
Division Dept. of
Telecommunications &
Cable 617-305-3531 or
800-392-6066

Global Connection Inc. of America d/b/a/ StandUP Wireless

1.800.544.4441
www.StandUPWireless.com





FREE*

CELL PHONE FREE MINUTES & TEXTS

See reverse for more info!



Actual handset may vary subject to availability.

Brochr Cell Prosp Smi 250 GEN REV003-03 17 15

PLEASE BRING A STATE ID AND PROOF OF ELIGIBILITY

**GET YOUR
FREE PHONE
TODAY!**

LIFELINE ELIGIBILITY CRITERIA Please check your eligibility on the list below

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps); Low Income Heat & Energy Assistance (LHEAP); Supplemental Security Income (SSI); Federal Public Housing Assistance (Section 8); Temporary Assistance for Needy Families (TANF); National Free School Lunch Program (NSL); Medicaid; AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MP, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY, PR	Bureau of Indian General Assistance; AK, CA, FL, KS, LA, MN, OK, RI, UT	Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	Tribally Administered TANF; AK, CA, FL, KS, LA, MN, OK, RI, UT	Food Distribution on Tribal Lands; FL, KS, LA, MN, OK, RI, UT	150% of Federal Poverty Guidelines or Below; AZ, CA, KS, MI, NM, OH, TX, VT	135% of Federal Poverty Guidelines or Below; AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KY, LA, ME, MD, MA, MI, MN, MP, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, WA, WV, WI, WY	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MN, NE, NJ, NY, OH, OK, OR, RI, TX, UT, VT, VA, USVI, WA, WV, WI, WY
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IMPORTANT LIFELINE WIRELESS SERVICE INFORMATION:

Lifeline is a government assistance program. **Only one Lifeline service is available per household.** A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. **Your household is not permitted to receive multiple Lifeline benefits** whether they be from one or multiple companies. This includes wireline and wireless services. **Lifeline is a non-transferable benefit.** You may not transfer your benefit to any other person. **You must activate your service. You must use your phone to continue to receive service.** Should you not use your service for 60 days you will be de-enrolled. **Lifeline is a federal benefit.** Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. **Proof of eligibility is required and only eligible customers may enroll.** Proof may consist of eligible program card or statement of benefits. Eligible Lifeline Subscribers will receive a free handset with calling features and receive 100 Anytime Minutes each month of service with rollover OR 250 Anytime Calling Units each month of service without rollover OR receive a discount from any premium plan.

C-2 Wireline

GREAT
TIMED OFFER
LIMITED

SAY HELLO TO REAL HOME PHONE BIG SAVINGS

First Month
~~\$38.45~~ FREE!

LIFELINE
ADVANTAGE PACKAGE
• Caller ID • Call Waiting • 100 Minutes Long Distance
• Unlimited Local • Emergency 911 Access
UNLIMITED
LONG DISTANCE MINUTES
Easy 1+ dialing
NO ACCESS
CODE REQUIRED
\$25.70*
Per Month

We proudly accept Global Connection Real Home Phone Service payments

- ✔ Unlimited Local Calls
- ✔ Great Plans
- ✔ No Credit Check
- ✔ No Contract
- ✔ No Deposit

If you receive Government supported services such as Food Stamps, SSI or Medicaid, you may be eligible for a Lifeline Discount on your home telephone service.

See back for contact information.
Hablamos español

*Restrictions apply. Go to www.RealHomePhone.com for details. AT&T service only. Includes qualified Lifeline Discount. Plus taxes fees and surcharges. For Lifeline eligible customers only.



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HOME PHONE SERVICE™

Customers may contact their State Public Service or Public Utility Commission with any unresolved questions or complaints concerning Lifeline services:

Colorado Public Utilities
Commission Consumer Affairs Unit at 404-656-4501
or 1-800-282-5813

Kansas Commission's Office of Public Affairs
and Consumer Protection at 785-271-3140
or 800-662-0027 TDD 800-766-3777

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Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	Head Start (Income Qualifying / Tribal Lands Only); AK, CA, FL, KS, LA, MN, OK, RI, UT	135% of Federal Poverty Guidelines or Below: AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, IL, IN, IA, KY, LA, ME, MD, MA, MI, MP, MS, MT, NE, ND, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VA, WA, WI, WV, PR.	150% of Federal Poverty Guidelines or Below: AZ, KS, MI, NM, OH, TX, VT	State has specific qualifying Programs (Check with us); AK, AR, CA, FL, GA, ID, KS, ME, MD, MA, MI, NE, NY, OH, OK, OR, RI, SC, SD, TN, TX, UT, VA, WA, WI, WV, PR.

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CONTACT YOUR LOCAL AGENT:

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CONTACT YOUR LOCAL AGENT:

ACERCA
AL SERVICIO LEGITIMO
DE TELEFONO PARA
DE TIENDA PARA
AL ASISTENTE
REGISTRARTE AHORA!

**DILE HOLA
AL SERVICIO LEGITIMO
DE TELEFONO DE CASA**

**GRANDES
AHORROS**

**PRIMER MES
\$38.45 GRATIS!**

PAQUETE AVANZADO
 * Identificador de llamadas • Llamada en espera
 • 100 minutos de llamadas locales
 • Llamadas • Acceso al 911

**LARGA DISTANCIA
ILIMITADA**

\$25.70* AL MES
El precio incluye el costo de acceso

Con gusto aceptamos pagos de Global Connection Servicio legitimo de casa.

- ✓ **Llamadas locales ilimitadas**
- ✓ **No verificamos crédito**
- ✓ **No contratos**
- ✓ **Magníficos planes**
- ✓ **No deposito**

Si recibe algún tipo de ayuda de Gobierno tales como Cupones de Alimentos, SSI o Medicaid, Usted puede ser elegible para un descuento Lifeline teléfono de casa.

Ver al respaldo Para contactarse y recibir información
 English available

*Reservaciones aplican. Visite www.RealHomePhone.com para detalles. Excluyente A88 área. Incluye descuento calificado de LIFE LINE. Más impuestos y recargos. Para oírmites Elegibles de Lifeline solamente.



**Agencia
SERVICIO
TELEFONICO
DE CASA.**
www.RealHomePhone.com
 www.800.441.4411

RHP Agent Tyler SFN REV001-069915



ACERCA
AL SERVICIO LEGITIMO
DE TIENDA PARA
AL ASISTENTE
REGISTRARTE AHORA!

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www.RealHomePhone.com
 www.800.441.4411

RHP Agent Tyler SFN REV001-069915



Legítimo SERVICIO TELEFÓNICO DE CASA™

Los clientes pueden ponerse en contacto con la Administración Pública Estatal ó Comisión de Servicios Públicos para preguntas sin resolver ó quejas sobre servicios básicos:

Servicios Públicos de Colorado
servicio al Consumidor Comisión
de Asuntos 303-894-2070 ó
800-456-0858.

Kansas Oficina de la Comisión de los
asuntos públicos protección al
consumidor en 785-271-3140 ó al
800-662-0027. TDD 800-766-3777

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Públicos de asuntos al
consumidor al 404-656-4501 ó
al 1800-282-5813

Massachusetts División de
Consumo Departamento de
Telecomunicaciones y Cable
617-305-3531 ó 800-392-6066.

IMPORTANTE INFORMACIÓN DE SERVICIO DE LIFELINE PARA SERVICIO RESIDENCIAL:

Lifeline es un programa de asistencia del gobierno. Sólo un servicio Lifeline está disponible por hogar. Una violación de las normas por la Comisión Federal de Comunicaciones de un servicio- por hogar constituye en la cancelación del programa. No está permitido recibir múltiples beneficios de Lifeline en un solo hogar, ya sean de una o varias compañías. Esto incluye el servicio residencial y móvil. Lifeline es un beneficio que no es transferible a otra persona. Usted debe activar su servicio y usar el teléfono para continuar recibiendo el servicio. Lifeline es un beneficio federal. Haciendo declaraciones falsas voluntariamente para obtener el beneficio puede resultar en multas, prisión, cancelación del servicio o ser excluidos del programa. Se requiere prueba de elegibilidad para inscribirse. El comprobante puede consistir en tarjeta de programa elegibles o declaración de beneficiarios. Los suscriptores elegibles para Lifeline se les ofrecen nuestra tarifa más baja de teléfono de casa de \$20.70 por mes, más impuestos solo en el área de AT&T.

CRITERIO DE ELEGIBILIDAD PARA LIFELINE Revise su elegibilidad en la siguiente lista

Programa de Asistencia de Nutrición Complementaria (SNAP) (Cupones para alimentos); Asistencia de Calificación y Energía para personas con bajos ingresos MI, MN, OK, RI, UT

150% de los lineamientos de pobreza federales o por pobreza federales o por ingresos bajos AZ, KS, MN, MO, OH, TN, VT

El estado tiene programas de pobreza federales o por debajo de ellos: AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, MD, MA, ME, MI, MN, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY

Head Start (solo para quienes califican por ingresos/territorio tribal); AK, CA, FL, KS, LA, MI, MN, OK, RI, UT

135% de los lineamientos de pobreza federales o por debajo de ellos: AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, MD, MA, ME, MI, MN, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY

TAMF administrado por el estado: AK, CA, FL, IL, IN, IA, MI, MN, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY

www.Realhomephone.com Servicio proporcionado por Global Connection Inc.

CONTACTE A SU AGENTE LOCAL:

Legítimo SERVICIO TELEFÓNICO DE CASA™

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150% de los lineamientos de pobreza federales o por pobreza federales o por ingresos bajos AZ, KS, MN, MO, OH, TN, VT

El estado tiene programas de pobreza federales o por debajo de ellos: AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, MD, MA, ME, MI, MN, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY

Head Start (solo para quienes califican por ingresos/territorio tribal); AK, CA, FL, KS, LA, MI, MN, OK, RI, UT

135% de los lineamientos de pobreza federales o por debajo de ellos: AL, AK, AR, CO, CT, DE, DC, FL, GA, GU, HI, ID, IL, IN, IA, KS, KY, LA, MD, MA, ME, MI, MN, MS, MT, NE, NV, NH, NJ, NY, NC, ND, OK, OR, PA, PR, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY

TAMF administrado por el estado: AK, CA, FL, IL, IN, IA, MI, MN, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, UT, VA, WA, WV, WI, WY

www.Realhomephone.com Servicio proporcionado por Global Connection Inc.

CONTACTE A SU AGENTE LOCAL:

IMPORTANTE INFORMACIÓN DE SERVICIO DE LIFELINE PARA SERVICIO RESIDENCIAL:

Lifeline es un programa de asistencia del gobierno. Sólo un servicio Lifeline está disponible por hogar. Una violación de las normas por la Comisión Federal de Comunicaciones de un servicio- por hogar constituye en la cancelación del programa. No está permitido recibir múltiples beneficios de Lifeline en un solo hogar, ya sean de una o varias compañías. Esto incluye el servicio residencial y móvil. Lifeline es un beneficio que no es transferible a otra persona. Usted debe activar su servicio y usar el teléfono para continuar recibiendo el servicio. Lifeline es un beneficio federal. Haciendo declaraciones falsas voluntariamente para obtener el beneficio puede resultar en multas, prisión, cancelación del servicio o ser excluidos del programa. Se requiere prueba de elegibilidad para inscribirse. El comprobante puede consistir en tarjeta de programa elegibles o declaración de beneficiarios. Los suscriptores elegibles para Lifeline se les ofrecen nuestra tarifa más baja de teléfono de casa de \$20.70 por mes, más impuestos solo en el área de AT&T.

CRITERIO DE ELEGIBILIDAD PARA LIFELINE Revise su elegibilidad en la siguiente lista

Programa de Asistencia de Nutrición Complementaria (SNAP) (Cupones para alimentos); Asistencia de Calificación y Energía para personas con bajos ingresos MI, MN, OK, RI, UT

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www.Realhomephone.com Servicio proporcionado por Global Connection Inc.

CONTACTE A SU AGENTE LOCAL:

Exhibit D

Georgia Public Service Commission Order

COMMISSIONERS:

LAUREN "BUBBA" McDONALD, JR., CHAIRMAN
STAN WISE
ROBERT B. BAKER, JR.
CHUCK EATON
H. DOUG EVERETT



FILED

DEC 28 2010

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

EXECUTIVE SECRETARY
G.P.S.C. REECE McALISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 656-4501
(800) 282-5813

244 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334-5701

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DOCKET# 9322
DOCUMENT# 133041

Docket No. 9322

IN RE: Application of Global Connection, Inc. for Certificate of Authority to Provide Local Exchange Service

ORDER ADOPTING CONSENT ORDER

This matter comes before the Georgia Public Service Commission ("Commission") to consider the proposed Consent Order (Attachment "A") between the Commission Staff and Global Connection, Inc. ("Global Connection").

JURISDICTION

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to

exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

Background

1.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders. These violations are detailed in the Consent Order that is attached as Exhibit A to this Order. A summary of these violations is provided below.

2.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund.

3.

Staff also determined that Global Connection charged a late fee in excess of the amount permitted in its Commission-approved tariff to an estimated 5,500 customers in Georgia.

4.

Finally, Staff determined that, beginning in or before July, 2008, the customer bills issued by Global Connection included a processing fee associated with switching carriers or terminating service that was inconsistent with the provisions of its Commission-approved tariff.

5.

To resolve these violations, Global Connection entered into a Consent Order with the Commission Staff in which it agreed to pay a civil penalty in the amount of \$55,000.00. Under the terms of the Consent Order, Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

6.

Also, to resolve these violations, beginning with its next billing cycle, Global Connection agreed to make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1.

After considering the proposed Consent Order, the Commission finds and concludes that the terms and conditions of the Stipulation are reasonable. The Commission finds that the amount of the civil penalty is reasonable, in light of the totality of the facts set forth in the Consent Order. The appropriate amount of a civil penalty involves judgment, and may be specific to the facts of the particular case. The penalty provided for in the Consent Order is sufficient to preserve the integrity of the Commission's rules, orders and administration of Georgia law.

2.

The record in this case shows that for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund ("UAF"). (Consent Order, ¶ 6). This action violates O.C.G.A. § 46-5-167(g), which provides that "A local exchange company or other company shall not establish a surcharge on customers' bills to collect from customers' contributions [to the UAF]." The Commission administers this statute. O.C.G.A. §§ 46-5-162(4) and 46-5-167.

3.

The record also shows that Global Connection recovered from an estimated 5,500 customers a late penalty of \$10.00. (Consent Order, ¶¶ 8, 10). The Commission-approved tariff sets a maximum late penalty of 1.5 percent of the past due amounts. *Id.* at ¶ 7. The monthly charge for Global Connection's service is approximately \$50.00. *Id.* at ¶ 9. The Commission finds that the late fee Global Connection recovered from these customers exceeded the late fee set forth in the Company's applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

4.

Finally, the facts show that Global Connection's customer bills stated that a \$25.00 processing fee applied in the event that a customer switched to another carrier or disconnected service. (Consent Order, ¶ 12). However, Section 2.13 of Global Connection's Commission-approved local service tariff does not authorize the imposition of this processing fee in those instances in which a customer cancels service after service has been installed. The Commission concludes that the customer bills do not comply with the applicable tariff provision. The Commission approved this tariff; therefore, Global Connection's actions violated what is, in effect, an order of the Commission.

The Commission also finds that it is reasonable to require Global Connection to modify its customer bills to comply with the Commission-approved tariff beginning with the next billing cycle.

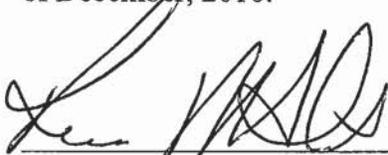
WHEREFORE IT IS ORDERED, that the Commission hereby adopts as an Order of this Commission, the Consent Order signed by the Commission Staff and Global Connection dated December 13, 2010, and attached as "Exhibit A" to this Order.

ORDERED FURTHER, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

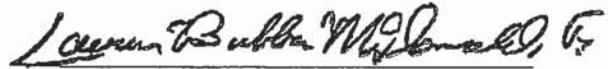
ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 21st day of December, 2010.



Reece McAlister
Executive Secretary



Lauren "Bubba" McDonald, Jr.
Chairman

12-22-10
Date

12-22-10
Date

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

FILED

DEC 13 2010

EXECUTIVE SECRETARY
G.P.S.C.

IN RE: **Application of Global Connection, Inc. for Certificate of Authority to
Provide Local Exchange Service**

CONSENT ORDER

The Staff of the Georgia Public Service Commission and Global Connection, Inc. ("Global Connection") hereby agree to present the following proposed disposition of the violations detailed herein to the Commission.

BACKGROUND AND LEGAL AUTHORITY

1.

Global Connection holds the following certificates from the Georgia Public Service Commission: Competitive Local Exchange Carrier Certificate of Authority, L-091, and Resale Certificate of Authority, R-0576.

2.

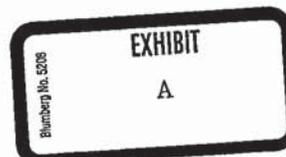
Global Connection is a "telecommunications company" as that term is defined under O.C.G.A. § 46-5-162(17).

3.

The Commission has general authority and jurisdiction over telecommunications companies pursuant to Georgia's Telecommunications and Competition Development Act of 1995 ("Telecom Act"), O.C.G.A. §§ 16-5-160 through 174, and generally O.C.G.A. §§ 46-1-1 through 5, 46-2-20, 46-2-21 and 46-2-23. In addition, upon a finding that a company subject to its jurisdiction willfully violates any law it administers or any duly promulgated regulation issued thereunder, or fails, neglects, or refuses to comply with any duly noticed order it issues, the Commission may assess a civil penalty not to exceed \$15,000.00 for such violation and an additional penalty not to exceed \$10,000.00 for each day during which such violation continues. O.C.G.A. § 46-2-91(a).

4.

On August 25, 2010, Global Connection filed an Application for Approval of Eligible Telecommunications Company Status. In the course of its review of Global's application, the Commission Staff discovered three violations of Georgia law and Commission orders.



5.

Pursuant to the Telecom Act, the Commission created a Universal Access Fund “to assure the provision of reasonably priced access to basic local exchange services throughout Georgia.” O.C.G.A. § 46-5-167(a). All certified telecommunications companies in Georgia are required to make quarterly contributions to the fund. O.C.G.A. § 46-5-167(b). Companies are prohibited from establishing a surcharge on customers’ bills to collect this contribution from customers. O.C.G.A. § 46-5-167(g).

6.

From its investigation, the Commission Staff found that, for at least the time period of July, 2008 through August, 2010, Global Connection included a surcharge on its bills to collect from customers its contributions to the Universal Access Fund. This action by Global Connection violated O.C.G.A. § 46-5-167(g).

7.

Section 2.15 of Global Connection’s Commission-approved local service tariff is entitled “Late Payment Charge.” This section states that “Invoices more than thirty (30) days past due will incur a monthly finance charge on the unpaid balance at a rate equal to the lesser of one and one-half percent (1.5%) per month or the maximum rate permitted by applicable Regulation.”

8.

The Commission Staff found that, for at least the time period of July, 2008 through August 2010, bills issued by Global Connection to its customers in Georgia stated that “[a] \$10.00 Late Fee Will Be Applied to Accounts When Payment Is Not Posted By Due Date.”

9.

The monthly charge a customer receiving local telecommunications service from Global Connection is approximately \$50.00. Therefore, the late fee that Global Connection included on its customer bills significantly exceeded the late fee permitted pursuant to its Commission-approved tariff.

10.

Based on discovery responses and discussions between Staff and Global Connection, the parties estimate that Global Connection collected the excessive late fee from about 5,500 customers in Georgia.

11.

Section 2.13 of Global Connection’s Commission-approved local service tariff states that “Customers who cancel a Service Order prior to Service installation (including without limitation cancellation of special construction or Services provided on an individual case basis will incur a

charge equal to the greater of (i) the non-recurring charges for the MSP, or (ii) the company's reasonably incurred, actual expenses associated with such cancellation."

12.

Beginning in or before July, 2008, Global Connection's bills issued by Global Connection to its customers in Georgia stated that "If this invoice is **PAID IN FULL**, [Global Connection] will issue a refund in the event of switching to another carrier or disconnection occurs prior to Bill Due Date, **minus a \$25 processing fee.**" (emphasis in original).

13.

Global Connection's Commission-approved local service tariff does not authorize the imposition of the processing fee described in paragraph 12 in those instances in which a customer cancels service after service has been installed. Therefore, the customer bills do not comply with the Commission-approved tariff.

AGREEMENT

The parties to this Consent Agreement are desirous of resolving this matter and believe that it is in the public interest to do so under the terms and conditions described herein. The undersigned parties hereby agree that this matter should be disposed of as follows:

1.

This Consent Agreement, if approved by the Commission, shall constitute a Final Order resolving the violations discussed herein. The parties agree that they will abide by the terms of the Consent Agreement.

2.

The Consent Agreement shall not become effective until approved without modification by the Commission. This Consent Agreement shall be void and of no effect whatsoever if it is not approved in its entirety by action of the Commission.

3.

Global Connection agrees to pay to the Commission in certified funds a civil penalty in the amount of \$55,000.00. Global Connection shall pay no less than \$18,334.00 by the first business day of January 2011. For each of the two months thereafter, Global Connection shall make an additional payment to the Commission on the first of the month in the amount of \$18,333.00. Global Connection may, at its sole option, pay the balance due at any time before March 1, 2011.

4.

Beginning with its next billing cycle, Global Connection shall make the modifications to its customer bills that are necessary to comply with the Commission-approved tariff.

5.

By entering into this Consent Agreement, Global Connection does not waive any notice, right, hearing, claim or defense with regard to any future action brought against it by the Commission or by any other person.

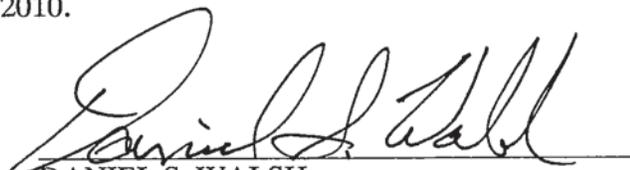
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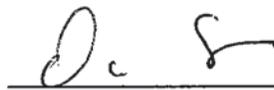
Nothing in this Consent Agreement shall be construed to relieve Global Connection from its responsibility to comply with the terms and conditions of its Certificates of Authority, the rules and regulations of the Commission, and the laws of the State of Georgia.

7.

Each of the undersigned acknowledges that he has read this Consent Agreement and understands its contents. Each of the undersigned acknowledges that the party he or she represents freely, knowingly and voluntarily enters into this consent Agreement. Each of the undersigned parties hereby consents to the resolution of this proceeding as provided.

Agreed to this 13th day of December 2010.


DANIEL S. WALSH
Senior Assistant Attorney General


GLOBAL CONNECTION, INC.