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November 19, 2010

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**Re: Notice of Ex Parte Communication, WC Docket 09-197**

Dear Ms. Dortch:

On November 18, 2010, Frank Del Col of dPi Mobile, Inc. ("dPi"), Robin Hicks of dPi, Charles Campbell of CGM Telecom Services, LLC, consultant to dPi, and Douglas Orvis of Bingham McCutchen, outside counsel to dPi met with Trent Harkrader, Vickie Robinson, Nicholas Degani, Kimberly Scardino and Joseph Cavender of the Telecommunications Access Policy Division of the Wireline Competition Bureau to discuss the above-referenced proceeding.

In the meeting, dPi discussed dPi's business model, and more generally issues relating to low income ETC applications and support, and the benefits that dPi provides to low income consumers. The attached materials were used in the presentation.

Sincerely yours,



Douglas D. Orvis II

Counsel to dPi Mobile, Inc.

**Attachment**

cc: Trent Harkrader  
Vickie Robinson  
Nicholas Degani  
Kimberly Scardino  
Joseph Cavender

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# dPi Mobile Overview



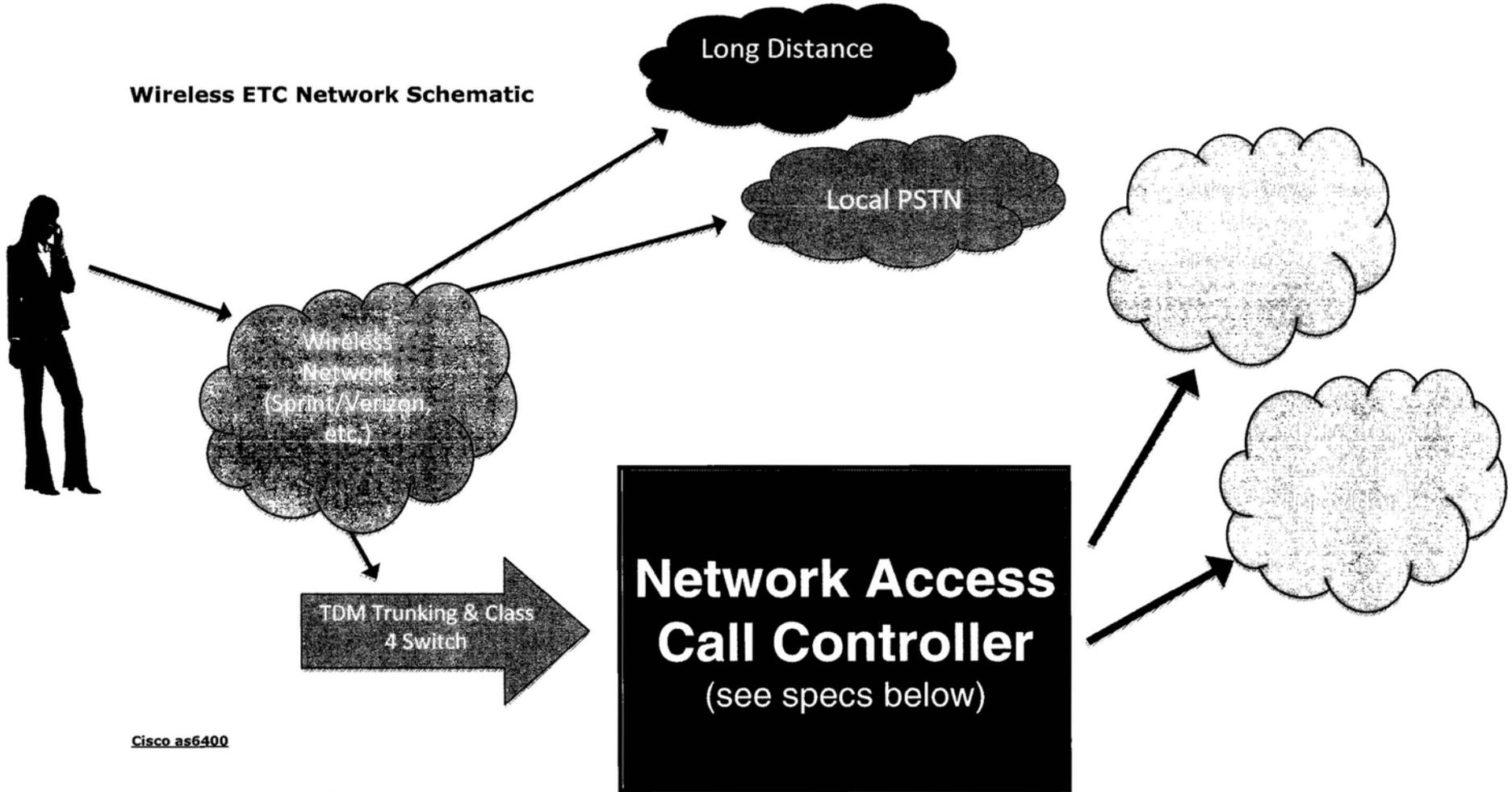
- dPi Mobile was launched as a prepaid wireless company in March 2010 and is available in over 200 dealer locations, direct sales 800# and online.
- Current subscriber base is just over 65,000 and growing.
- dPi Mobile operates an ETC approved wireless program in Louisiana and Arkansas today with the expectation of growth into 30 states by 2013
- dPi Teleconnect provides pre-paid home phone and wireless across 30 states in the US. Of those 10 where designated as ETC provider with discounted services.

# Competitive Landscape



- Every wireless carrier in the US is required by law to offer Linkup and Lifeline subsidies to qualifying low-income consumers.
- However, the major players have neglected this segment due to lower ARPU.
- There are only two other players who are actively marketing a similar program in the space, Safelink (Tracfone) and Assurance (VirginMobile).
- Neither of the two utilize a physical distribution network and rely primarily on internet and phone-ordering systems. dPi Mobile has a physical distribution network of 9,000 locations growing every month. This is our key competitive advantage.

**Wireless ETC Network Schematic**



Cisco as6400

**TDM Class 4 Switch**

The PRI/DS3 and Class 4 switch are owned by a vendor to the ETC provider, and serves to route calls based upon the identity of the ETC provider. *Capacity is leased to the ETC provider.*

**Network Access Call Controller (ETC - Provider owned)**

Provides enhanced call routing and control for calls going to Directory Assistance and/or Operator Service provider(s). The Controller provides an ETC-specific voice announcement, and provides PSTN-grade service. The Controller is Telcordia compliant. *The ETC provider holds absolute title to the Call Controller.*