

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

In the Matter of	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Midwestern Telecommunications Inc. Petition for Forbearance	)	

**MIDWESTERN TELECOMMUNICATIONS, INC'S  
REVISED COMPLIANCE PLAN**

Midwestern Telecommunications, Inc. (“Midwestern Telecom” or “MTI”) hereby files its Revised Compliance Plan outlining the measures it will take to implement the conditions imposed by the Federal Communications Commission (“Commission” or “FCC”) in its Order, released on July 30, 2010, in the above-captioned matter.<sup>1</sup> This plan is similar to the plan recently approved by the Wireline Competition Bureau for i-wireless, LLC (“i-wireless”), and fulfills condition (8) of the *Forbearance Order* upon filing.<sup>2</sup> Although the *Forbearance Order* does not require Commission approval of this Revised Compliance Plan, MTI recognizes that the Bureau formally approved i-wireless’ compliance plan and thus, to remove all doubt, MTI respectfully requests expeditious approval of this plan.

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<sup>1</sup> See *Telecommunications Carriers Eligible for Universal Service Support; Midwestern Telecommunications Inc. Petition for Forbearance*, Order, WC Docket No. 09-197, CC Docket No. 96-45, 25 FCC Rcd 10510 (rel. July 30, 2010) (“*Forbearance Order*”).

<sup>2</sup> *Telecommunications Carriers Eligible for Universal Service Support; i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, 26 FCC Rcd 14508 (2011).

## BACKGROUND

The Commission's *Forbearance Order* conditionally granted Midwestern Telecom's request for forbearance from the Section 214(e)(1)(A) requirement that a carrier designated as an ETC for purposes of federal universal service support provide services, at least in part, over its own facilities.<sup>3</sup> The Commission found that a conditional grant of forbearance to MTI from the facilities requirement of section 214(e) for the purpose of seeking ETC designation to provide Lifeline support would "further the statutory goal of providing low-income subscribers access to telecommunications and emergency services, while protecting the universal service fund against waste, fraud, and abuse."<sup>4</sup> The Commission's grant of forbearance was subject to the following conditions: (1) Midwestern Telecom providing its Lifeline customers with 911 and Enhanced 911 ("E911") access regardless of activation status and availability of prepaid minutes; (2) Midwestern Telecom providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (3) Midwestern Telecom complying with conditions (1) and (2) as of the date it provides Lifeline service; (4) Midwestern Telecom obtaining a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met; (5) Midwestern Telecom requiring each customer to self-certify at time of service activation and annually thereafter that he or she is the head of household and

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<sup>3</sup> *Forbearance Order* at ¶ 20. MTI had sought forbearance even though it was utilizing some of its own facilities to provide supported service in several states. *See* Letter of John T. Nakahata, Counsel to Midwestern Telecommunications, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 09-197 (filed June 28, 2010). Grant of forbearance allows MTI to receive support for providing Lifeline services in states in which it would not be utilizing some of its own facilities, or to cease using its own facilities in existing states. *Id.*

<sup>4</sup> *Id.*

receives Lifeline-supported service only from Midwestern Telecom; (6) Midwestern Telecom establishing safeguards to prevent its customers from receiving multiple Lifeline subsidies from Midwestern Telecom at the same address; and (7) Midwestern Telecom dealing directly with the customer to certify and verify the customer's Lifeline eligibility.<sup>5</sup> As an eighth condition, the Commission required Midwestern Telecom to submit a plan describing the measures it would take to implement each one of these conditions.<sup>6</sup> MTI is not seeking support for Link Up in any area in which it would be providing service pursuant to the grant of forbearance, as the Commission denied that portion of MTI's request for forbearance.<sup>7</sup>

### **REVISED COMPLIANCE PLAN**

Midwestern Telecom commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers.<sup>8</sup> In addition to taking the steps described below, Midwestern Telecom will comply with all conditions set forth in the *Forbearance Order*, the provision of this Revised Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.

#### **I. Access to 911 and E911 Services**

In the *Forbearance Order*, the Commission required Midwestern Telecom to provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service, and stated that Midwestern Telecom must obtain certification from each PSAP where it provides Lifeline service confirming that its customers receive 911 and E911 services. If, within 90 days

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<sup>5</sup> See *id.* at ¶¶ 11, 16.

<sup>6</sup> See *id.* at ¶ 16.

<sup>7</sup> See *id.* at ¶¶ 1, 21.

<sup>8</sup> See *id.* at ¶ 12.

of Midwestern Telecom's request, a PSAP has neither provided the certification nor made an affirmative finding that MTI does not provide its customers with 911 and E911 services within the applicable service area, the *Forbearance Order* allows Midwestern Telecom to self-certify that it meets the requirements.<sup>9</sup> The Commission and consumers are thereby assured that all Midwestern Telecom 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 Midwestern Telecom handsets, even if the account associated with the handset has no minutes remaining.

Midwestern Telecom can ensure that all Lifeline customers will have meaningful access to emergency calling services at the time the customer activates Lifeline service, and that such access will continue regardless of the customer's account status or the availability of prepaid minutes. MTI's existing practices currently provide access to 911 and E911 services inasmuch as these services have been deployed by its underlying carriers – all of which are required by 47 C.F.R. § 20.18 to provide access to and to complete all 911 and E911 calls received by their networks.<sup>10</sup> Midwestern Telecom also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended, or terminated.<sup>11</sup> Finally, through its underlying carriers, MTI transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

To satisfy the conditions of the *Forbearance Order* regarding 911 and E911 services, Midwestern Telecom will implement the following measure. Initially, MTI will confirm that its

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<sup>9</sup> See *id.* at ¶ 13.

<sup>10</sup> This also fulfills MTI's obligations pursuant to 47 C.F.R. § 20.18(m).

<sup>11</sup> MTI is a CDMA carrier.

underlying carrier has deployed E911 services in a specific PSAP territory. Midwestern Telecom will obtain the requisite certification from each PSAP where it provides Lifeline service confirming that its customers receive 911 and E911 services.<sup>12</sup> If, within 90 days of receiving the Company's request, a PSAP has neither provided such certification nor made an affirmative finding that Midwestern Telecom does not provide its customers with 911 and E911 services within the applicable service area, Midwestern Telecom will self-certify that it meets the basic and E911 requirements.

## **II. E911-Compliant Handsets**

The Commission also conditioned its grant of forbearance on Midwestern Telecom providing only E911-compliant handsets to its Lifeline customers.<sup>13</sup> Midwestern Telecom will ensure that all handsets used in connection with the Lifeline service offering will be E911-compliant. In fact, MTI's phones have always been and will continue to be 911 and E911-compliant. As a result, any existing customer that qualifies for or elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Furthermore, in the event that an existing customer does not have an E911-compliant handset, MTI will replace it with a new 911/E911-compliant handset at no charge to the customer. 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.

## **III. Certification of Lifeline Customers' Eligibility**

To safeguard against misuse of the Lifeline service plan, the *Forbearance Order* required Midwestern Telecom to deal directly with customers and require customers to self-certify, under

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<sup>12</sup> A form of this PSAP certification request is attached hereto as Exhibit A.

<sup>13</sup> See *Forbearance Order* at ¶ 11.

penalty of perjury, at time of service activation and annually thereafter that they are the head of household and receive Lifeline-supported service only from Midwestern Telecom.<sup>14</sup> The Commission also required Midwestern Telecom to establish safeguards to prohibit more than one supported Midwestern Telecom service at each residential address.<sup>15</sup> Unless and until the Commission issues new rules in its Lifeline rulemaking proceeding that set forth different requirements, Midwestern Telecom will implement these certification and verification conditions (the plan would be modified to confirm to any new rules and orders, once issued and effective):

**A. Policy**

Midwestern Telecom will comply with all certification and verification requirements for Lifeline eligibility established by states where it is designated as an ETC. In states where there are no state imposed requirements, Midwestern Telecom will comply with the certification and verification procedures in effect in that state as reflected on the website of the Universal Service Administration Company (“USAC”). For any states which do not mandate Lifeline support and/or which do not have established rules of procedure in place, Midwestern Telecom will certify at the outset and will verify annually consumers’ Lifeline eligibility in accordance with the Commission’s requirements.

**B. Certification Procedures**

Midwestern Telecom will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting Midwestern Telecom via telephone, facsimile, or the Internet. At the point of sale, consumers will be provided with printed information describing MTI’s Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers will be signed up in person or directed, via company

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<sup>14</sup> See *id.* at ¶ 16.

<sup>15</sup> See *id.*

literature, collateral, or advertising, to a toll-free telephone number and to Midwestern Telecom's website, which will contain a link to information regarding MTI's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. Midwestern Telecom understands and accepts the Commission's requirement that it have direct contact with all customers applying for participation in the Lifeline program.<sup>16</sup> Retailers will have no role in the Lifeline application process, other than to provide customers with printed information regarding the program. MTI will provide Lifeline-specific training to all personnel, whether employees or agents, who interact with actual or prospective consumers with respect to obtaining, changing, or terminating its Lifeline services.

Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006, and any applicable state laws. Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under Midwestern Telecom's supervision by managers experienced in the administration of the Lifeline program.

Midwestern Telecom will ensure that all required documentation is reviewed and taken care of properly by using state-specific compliance checklists. For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate, and to furnish proof that they currently participate in such program(s), regardless of whether such proof is required pursuant to state law. For states with income-based eligibility criteria, the applicant will be required to

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<sup>16</sup> *See id.*

certify under penalty of perjury that his or her household income does not exceed the relevant threshold (*e.g.*, 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide proof of income-based eligibility. Notwithstanding the foregoing with respect to program or income eligibility, for states that require MTI to enroll subscribers identified by the state or as eligible in a state database, MTI may continue to rely on the state identification or database. In addition, the Lifeline application form will include a certification section where the application must attest and sign under penalty of perjury that the applicant's representations are true and correct. Applicants will also be required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from Midwestern Telecom. Penalties for perjury will be clearly-stated on the certification form, as required by the *Forbearance Order*.<sup>17</sup> MTI will use substantially the following form of its certification, printed in at least 10-point font:<sup>18</sup>

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 5 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law. \_\_\_\_\_
2. I understand that Lifeline is only available for one phone line per household, whether landline or wireless. I am the head of household and will only receive Lifeline from MTI (Midwestern Telecommunications, Inc.). \_\_\_\_\_
3. I am not currently receiving a Lifeline telephone service from any other landline or wireless telephone company. (Some Lifeline services are not marketed under a “Lifeline” name; these include Lifeline services sold under the names AT&T, Life Wireless; TAG Mobile, Reachout Wireless, Assurance Wireless and Safelink.) \_\_\_\_\_
4. Furthermore, I certify that I will only use this phone for my family's own use and will not resell it. \_\_\_\_\_
5. I will notify MTI immediately if I no longer qualify for Lifeline, or if I have a question as to whether I

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<sup>17</sup> See *id.* at ¶ 17.

<sup>18</sup> Among other things, MTI may, at its option, periodically update or change the list of Lifeline services identified in certification item No. 3 to reflect its judgment as to the most common prepaid wireless Lifeline products offered in its service areas, taken together, under names that are not readily identifiable as Lifeline services.

would still qualify. \_\_\_\_\_

Perjury and false statements are punishable by fines and/or imprisonment.

Signature (required) \_\_\_\_\_ Date \_\_\_\_\_

Finally, the application forms will require each applicant to provide their name, primary residential address, and an alternate telephone number (if any). Midwestern Telecom will incorporate this information into its customer information database. Prior to initially submitting for reimbursement for a customer, MTI will check the name and address of each Lifeline applicant against its database to determine whether or not it is associated with the same or another customer that already receives Midwestern Telecom Lifeline service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with the address. Midwestern Telecom will deny the Lifeline application of any such individual and advise the applicant of the basis for the denial. In addition, prior to requesting a subsidy, MTI will process and validate MTI's subsidy data to prevent: (1) duplicate same-month Lifeline subsidies ("Double Dip," *i.e.*, any household that is already receiving a Lifeline subsidy from MTI will be automatically prevented from receiving a second Lifeline subsidy in that same month); and (2) inactive lines receiving subsidy (*i.e.*, systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines, defined subscriber lines not excluded by the non-usage policy below).<sup>19</sup> Midwestern Telecom shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Midwestern Telecom customers from engaging in such abuse of the program, whether inadvertently or intentionally.

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<sup>19</sup> See Non-Usage Policy at Section IV.A, *infra*.

### **C. Verification Procedures**

As required by the Commission's *Forbearance Order*, Midwestern Telecom will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from Midwestern Telecom.<sup>20</sup> Midwestern Telecom will notify participating Lifeline consumers on the anniversary of their enrollment that they must confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on record with Midwestern Telecom. The notice will explain the actions that the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact Midwestern Telecom. Customers will have 60 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from Midwestern Telecom, and return the form to Midwestern Telecom by mail. Anyone who does not respond to the mailing and certify their continued eligibility will be removed from the Lifeline program.

Currently, customers will be required to complete the verification process by mail; however, MTI may offer additional options, such as web-based methods, in the future. Such verification will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from MTI at the discounted rate only available to those customers who are enrolled in its Lifeline program.

## **IV. Additional Measures to Prevent Waste, Fraud, and Abuse**

### **A. Non-Usage Policy**

Midwestern Telecom will implement a non-usage policy whereby it will identify Lifeline

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<sup>20</sup> See *Forbearance Order* at ¶ 16.

customers that have not used MTI’s Lifeline service for 60 days, and cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period.<sup>21</sup> Specifically, if no usage appears on a Midwestern Telecom customer’s account during any continuous 60-day period, MTI will promptly notify the customer that he or she is no longer eligible for MTI Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer’s account will remain active, but MTI will engage in outreach efforts to determine whether the customer desires to remain on MTI’s Lifeline service. If the customer’s account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, sending a text message, downloading data, or adding money to the account), MTI will not seek to recover a federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer re-initiates service.

#### **B. Customer Education with Respect to Duplicates**

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, MTI will implement 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.

- a) *Call Center Scripts* – MTI will emphasize the “one Lifeline phone per household” restriction through its interaction with the potential customer at the call center. The

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<sup>21</sup> Midwestern Telecom will consult with the state commissions (PUCs) in the states where it provides Lifeline services regarding implementation of the policy described above. MTI expects that certain state PUCs or similar agencies may seek to incorporate state-specific variations to the policy. Consequently, MTI may modify the parameters of its non-usage policy after consultation with the respective state PUCs.

substantial form of the call center introduction script that MTI would use is attached as Exhibit B.

- b) *Sales Scripts* – MTI will also emphasize the “one Lifeline phone per household” restriction through its direct sales contact with the potential customer. The sales training materials will 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. Attached as Exhibit C is a sample of training material that would meet the requirements of this provision.
- c) *Marketing, Advertising, and Website Content* – MTI, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. The following statement will appear in a conspicuous place with a bold, minimum 10-point font in an offsetting color, to ensure that it is not overlooked:

**Note: By law, the Lifeline program is only available for one phone per household.**

This statement will also appear on the company’s website ([www.mticell.com](http://www.mticell.com)) during the customer information/education/application cycle. At all times during the application process, MTI will display the message above. In addition, MTI will include in its printed materials and website a statement substantially similar to the following: “Not all Lifeline-supported programs are identified as ‘Lifeline’ and may be marketed under other brand names.”

### **C. Cooperation with State and Federal Regulators**

Midwestern Telecom has and will continue to cooperate with federal and state regulators to prevent waste, fraud, and abuse, including by:

- Providing state commissions (PUCs), the FCC, or USAC with data, upon request, that will enable the state, FCC, or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, MTI agrees to make state-specific customer data available upon request, including name and address information, to each state PUC where it operates, the FCC, or USAC for the purpose of permitting the PUC, FCC, or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC, or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer’s Lifeline service and no longer report that customer on USAC Form 497 if MTI’s investigation, a state, the FCC, or USAC

concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that MTI's Lifeline service should be discontinued such as a de-enrollment notification pursuant to the FCC's June 2011 Lifeline and Link Up Report and Order.<sup>22</sup>

**V. Included Usage**

Midwestern Telecom will offer at least one Lifeline plan that provides customers with at least 250 included minutes-of-use per month. This provision will expire 36 months from the date of approval of this Revised Compliance Plan.

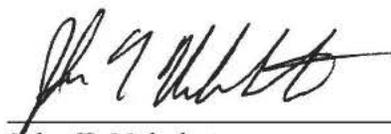
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<sup>22</sup> See *Lifeline and Link Up Reform and Modernization*, Report and Order, WC Docket No. 11-42, 03-109, CC Docket No. 96-4, 26 FCC Rcd 9022, 9030-32 (rel. June 21, 2011).

## CONCLUSION

Midwestern Telecom submits that its Revised Compliance Plan fully satisfies the conditions set forth in the Commission's *Forbearance Order* granting forbearance to Midwestern Telecom. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of MTI's Lifeline services. Accordingly, although not required by the *Forbearance Order*, Midwestern Telecom respectfully requests that the Commission approve its Revised Compliance Plan.

Respectfully submitted,



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*Counsel to Midwestern Telecommunications, Inc.*

December 6, 2011

**EXHIBIT A**

PSAP CERTIFICATION REQUEST

[Date]

Public Safety Answering Point Coordinator  
[Address]

Re: Request for PSAP Certification for Lifeline Participation

Dear PSAP Coordinator:

This is to inform you that Midwestern Telecom, Inc. (“Midwestern Telecom”), has been designated an Eligible Telecommunications Carrier (“ETC”) by [[the Federal Communications Commission (“FCC”)] or [State]] for the purpose of offering reduced-cost service to low-income customers in the state of [State] under the federal Lifeline program. (See attached [FCC Order\_\_ released \_\_\_\_\_ or state order].)

Lifeline ensures that low-income customers have access to quality telephone service at reasonable, affordable rates, and Midwestern Telecom is pleased to be among the wireless carriers offering Lifeline services to low-income customers, particularly during this difficult economic environment.

The FCC’s approval for Midwestern Telecom to offer Lifeline service was conditioned upon the following requirements: (1) offer 911 and enhanced 911 (E911) access immediately upon activation of service, and (2) provide its new Lifeline customers with E911-compliant handsets and replace, at no additional charge to the customer, noncompliant handsets of existing customers who subscribe to Lifeline service. The FCC further required that Midwestern Telecom seek certification from each Public Safety Answering Point (“PSAP”) where Midwestern Telecom intends to offer Lifeline service confirming that Midwestern Telecom provides its customers with 911 and E911 access. Midwestern Telecom is seeking this certification from your PSAP based on the information provided in this letter and any additional information you may request.

Midwestern Telecom’s wireless services will operate on a national carrier's network. The national carrier has completed the deployment of facilities necessary to offer Phase I and/or II E911 services in your service area, providing our carrier partner and Midwestern Telecom customers with 911 and E911 access. Midwestern Telecom’s Lifeline customers will enjoy this same access to 911 and E911 service once activated for service, regardless of activation status or availability of prepaid airtime. As required by the FCC, all Midwestern Telecom handsets will comply with applicable federal requirements governing the provision of 911 and E911 service. Midwestern Telecom will provide new Lifeline customers with E911-compliant handsets and, for existing customers who subscribe to Lifeline service, will verify that their handsets are E911-compliant or replace the handset at no charge to the customer.

For your convenience, enclosed is a certification form for your review and signature as PSAP Coordinator. Please return the signed certification form in the self-addressed stamped envelope. As required by the FCC, Midwestern Telecom will keep the certification on file in the event the FCC seeks to review this documentation. **If within 90 days of receipt of this letter, you do not provide the certification or make an affirmative finding that Midwestern Telecom does not provide its customers with 911 and E911 service in your area, Midwestern Telecom is permitted to self-certify compliance with the requirements for 911 and E911 access for this PSAP.** (See FCC Order 10-134 at ¶ 13.)

Should you have any questions about the foregoing, please contact us at ek@mymti.com. Please be sure to include your name and address in the email.

Thank you in advance for your cooperation and for enabling Midwestern Telecom to offer Lifeline service to low income customers in your PSAP jurisdiction.

Sincerely,

Midwestern Telecommunications, Inc.

**Midwestern Telecommunications, Inc. Lifeline Program  
PSAP Certification Form**

State of \_\_\_\_\_

PSAP Name: \_\_\_\_\_

PSAP Coordinator Name: \_\_\_\_\_

Business Address: \_\_\_\_\_

\_\_\_\_\_

PSAP Jurisdiction Description: \_\_\_\_\_

In my capacity as the Coordinator for the Public Safety Answering Point (“PSAP”) described above,

I am responsible for the implementation of 911 and Enhanced 911 (“E911”) service in accordance with the rules and regulations of the Federal Communications Commission (“FCC”).

I have been informed by Midwestern Telecommunications, Inc. (“Midwestern Telecom”) that, by Order dated, \_\_\_\_\_, the [[FCC] or [State]] has designated Midwestern Telecom as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (47 U.S.C. § 214(e)(6)), for the limited purpose of providing Lifeline service in [State], among other states. I have further been informed that the FCC’s designation of Midwestern Telecom as an ETC is subject to certain conditions; including a condition that Midwestern Telecom must obtain certification from each PSAP where it will offer Lifeline service that Midwestern Telecom customers will have 911 and E911 access immediately upon activation of service.

In connection with its request for certification by the PSAP, Midwestern Telecom has provided certain information. I have been informed by Midwestern Telecom that its wireless service operates on the [national carrier] network. Midwestern Telecom has indicated that its Lifeline customers will have the same access to 911 and E911 service as the retail customers of [national carrier]. In addition, Midwestern Telecom has represented that its Lifeline handsets will comply with the FCC Order requiring that the handsets be capable of accessing 911 and E911 service regardless of activation status or availability of prepaid airtime.

Upon information and belief, in my capacity as PSAP Coordinator, I hereby certify that Midwestern Telecom has provided evidence that it is complying with the FCC requirement that it provide customers with access to basic and E911 service immediately upon activation of Lifeline service.

Dated:

\_\_\_\_\_  
Signature of PSAP Coordinator

**EXHIBIT B**

CALL CENTER SCRIPT

**MTI (Midwestern Telecommunications, Inc.) Call Center Script  
Call Initiation - Part 1**

**Greeting: “Thank you for calling MTI. This is (Agent Name). May I please have your last name and the state you are calling from?”**

**\*\* Agent – Perform customer search while asking customer \*\***

- “Are you calling for a new application or to check status?”
- **If status of application:** “May I please have your address?”
- **If new application:** Validate that they are the head of household and that they are not currently receiving a Lifeline subsidized phone with the following line of questioning:
  - a) “Do you currently have wireless or home phone service?” (if no, skip (b)- (e))
  - b) **If yes:** “Is that [wireless or home phone] service a subsidized service or do you pay full price?”
  - c) **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
  - d) **If they are unsure:** “Who is your provider for that service?” (Safelink, Assurance, TSI / Nexus Communications, Life Wireless, TAG Mobile, or DPI only offer Lifeline so go to (e). If a more ambiguous provider, e.g., Verizon or AT&T, try to question further to determine if they have Lifeline).
  - e) **If it is Lifeline:** “We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us.”

\* If it is evident that they don't already have Lifeline service then click on add new customer and fill out appropriate information.

**EXHIBIT C**

SAMPLE TRAINING MATERIAL

**MTI (Midwestern Telecommunications, Inc.)  
Sales Training Materials**

**Refer to the state specific one page Sales Information sheet for state specific, program information.**

If customer is interested in Lifeline service and is eligible under one of the programs or the income threshold listed in the “**Who is eligible to receive a MTI phone and Free Service?**” section of the state specific information sheet, please complete the following procedures:

1. Ask the following questions:
  - a) “Do you currently have wireless or home phone service?” (if no, skip (b)- (f))
  - b) **If yes:** “Is that [wireless or home phone] service a subsidized or no-charge service, or do you pay full price?”
  - c) **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
  - d) **If they are unsure:** “Who is your provider for that service?” (Safelink, Assurance, TSI / Nexus Communications, Life Wireless, TAG Mobile, or DPI only offer Lifeline so go to (e). If a more ambiguous provider, e.g., Verizon or AT&T, try to dig further to determine if they have Lifeline).
  - e) **If it is Lifeline:** “We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us.”

If it is evident that they don't already have Lifeline service, then proceed to 2:

2. Click on “check customer's address” to perform an address check to insure there isn't already a MTI phone registered to that address.
  - a) If there is an active MTI phone registered at that address, then thank customer for their interest, explain the situation and say, “By law, the Lifeline program is only available for one phone per household.”
  - b) If there isn't an active MTI phone registered at that address, proceed to 3.
3. Assist customer in filling out the state specific application. Use the application guide/checklist to make sure it is filled out appropriately. Review the documentation for program/income proof closely against the guidelines to make sure the documentation meets the requirements.