

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

December 15, 2011

VIA HAND DELIVERY

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

Re: Notice of Oral Ex Parte Presentation - WC Docket Nos. 11-42, 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92, 96-45 and WT Docket No. 10-208

Dear Ms. Dortch:

On Wednesday, December 13, 2011, the undersigned counsel for the Link Up for America Coalition (“Coalition”) met with Zachary Katz, Legal Advisor to Chairman Genachowski, and Carol Matthey, Patrick Halley, Trent Harkrader, Kim Scardino and Garnet Hanley of the Wireline Competition Bureau to discuss the impact, if any, of the Connect America Fund order, and associated rule changes, on the Commission’s Low Income Universal Service program and on low income-only ETCs. A copy of the document discussed at the meeting is appended hereto for inclusion with this letter in the record of the above-captioned proceedings.¹

Notwithstanding notice provisions indicating an intent only to recast the nine supported services in a new, technology neutral definition,² and a footnote indicating that references to ETCs excluded low income-only ETCs (who reasonably would expect to be impacted by the outcome of the Commission’s ongoing low income fund reform proceeding),³

¹ The document distributed at the meeting is included as Exhibit 1.

² See *Connect America Fund*, WC Docket No. 10-90 et al., Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13, ¶ 96 (Feb. 9, 2011) (“CAF NPRM”).

³ See *Connect America Fund*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, n.105 (rel. Nov. 18, 2011) (“CAF Order”).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
December 15, 2011
Page Two

we drew attention to and identified our concerns with the potential impact of the changes to rule 54.101 on low income-only ETCs. Further, we acknowledged the Bureau's interpretation of the prospective impact of the changes to rule 54.101, which the Bureau announced in its December 7, 2011 *ex parte* regarding its most recent communications with the states about the status of wireless ETCs.⁴ While we acknowledged the plausibility of the Bureau's interpretation of the prospective effect of the changed rule, we respectfully highlighted the substantial ambiguity created by the fact that the order did not explicitly say that directory assistance, operator services and interexchange services were no longer considered voice telephony services or that they were voice telephony services that were no longer supported by the fund.⁵ We also noted (respectfully) that the statutory analysis required for defining supported services is not set forth in the order.⁶

We advised the Commission staff that the surprise and ambiguity created by the rule change already has resulted in market disruptions not typically associated with Commission rulemaking decisions.⁷ More importantly, we warned of the enormously threatening potential the rule change has to create more substantial near-term market disruptions for wireless ETCs and harm for their low income customers. In this regard, we noted that the CAF Order contained:

- > no guidance as to the impact the rule change might have with respect to existing ETCs;
- > no guidance to the state commissions on how to implement the rule change while carrying out their statutorily defined role of designating ETCs;

⁴ See *Ex Parte* Notice of Sharon Gillett, WC Docket No. 11-42 et al. at 1-2 (filed Dec. 7, 2011) (“once this amendment to section 54.101 takes effect on December 29, 2011, a carrier seeking Lifeline-only ETC designation could not meet the facilities requirement of section 214(e)(1) if it only has facilities used for operator and directory assistance....”).

⁵ See CAF Order, ¶ 78, n.114. The revised rule uses the word “including” so as not to be limited to the functionalities of “voice telephony service” set forth therein, and as such, it departs starkly from the approach of the former version which had definitively listed the scope of supported services. See CAF Order, Appendix A at p.536.

⁶ See CAF NPRM, n.163 (“Because we are merely proposing to consolidate all currently supported services for high cost under one new term, “voice telephony service,” we need not consider whether these consolidated services should be part of the definition of supported services. 47 U.S.C. § 254(c)(1)(A)-(D).”).

⁷ For example, we revealed that at least one Coalition member had cancelled pending orders for additional handsets.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
December 15, 2011
Page Three

- > no guidance for the Universal Service Administrative Company (“USAC”); and
- > no transition plan for low income ETCs who had relied on state commission ETC designations and longstanding Commission precedent regarding the use of facilities to provide any of the nine supported services, including directory assistance and operator services.

We explained that, in the absence of nearly immediate *sua sponte* clarification by the Commission, the sum of these ambiguities would threaten service disruption on December 29, 2011 for an estimated 2 million-plus Lifeline service customers served by ETCs who presently rely on state commission ETC designations soundly made based on the current version of rule 54.101 and longstanding Commission precedent interpreting it.⁸

Accordingly, we urged the Commission to take immediate action to ensure that the rule change would not threaten to disrupt service to low income consumers or disrupt the legitimate business plans of low income-only ETCs. We asked the Commission to clarify that the rule change would have no impact on low income-only ETCs until such time as the Commission issues further guidance in its upcoming low income fund reform order. We noted that, while the facilities requirement for ETCs is statutory, the Commission’s revised interpretation of that requirement is a regulation which the Commission has wide latitude to suspend or delay the effect of (at least for low income-only ETCs) in order to avoid marketplace disruptions and consumer harm, especially if only on an interim or transitional basis.⁹ We also noted that facilities-based ETCs already had begun exploring alternative facilities-based approaches with suppliers, but that it would take time to develop and implement solutions. Further, we are at this time unable to estimate how long that might take. We indicated that we would provide additional information at a later date for the Commission’s consideration in developing a rational transition plan related to the rule change.

In response to TracFone’s assertion that the Commission “should determine whether to afford the amendment of Section 54.101(a) retroactive effect,”¹⁰ we respectfully reminded the Commission staff that the Administrative Procedure Act and well settled law

⁸ Estimate provided by CGM, LLC.

⁹ See *Competitive Telecom Assoc. v. FCC*, 309 F.3d 8, 14 (DC Cir. 2002) (“avoidance of market disruption pending broader reforms is, of course, a standard and accepted justification for a temporary rule.”) (citing *MCI v. FCC*, 750 F.2d 135, 140 (DC Cir. 1984) (“substantial deference by courts is accorded to an agency when the issue concerns interim relief.”)).

¹⁰ See Notice of Ex Parte Presentation of TracFone Wireless, Inc., WC Docket No. 11-42 at 2 (filed Dec. 12, 2011).

Marlene H. Dortch, Secretary
December 15, 2011
Page Four

requires that rule changes have no retroactive effect.¹¹ In light of this bar, we urged the Commission to clarify that the rule change would have no impact on previously designated low income-only ETCs and that its prospective impact could only be realized through state ETC designation proceedings conducted *after* the Commission provides further guidance on how the rule change may or may not impact low income-only ETCs.¹² We also asserted that the statutory requirement with respect to facilities was met when a state commission made its ETC designation and that such designations properly were made based on the Commission rule in effect at the time such designation was made, and asked for the Commission to clarify that it did not alter (and could not have altered) state ETC designations through the CAF Order or the amendment to rule 54.101.

We also asked that the Commission clarify to USAC that requests for Lifeline or Link Up reimbursements from low income-only ETCs are not impacted by the rule change and the *status quo* should prevail until the Commission's low income fund reform order is issued and any changes take effect in accordance with guidance set forth therein. Again, we noted that such Commission transitional measures taken to avoid market disruption are given substantial deference.¹³

We also asserted that, if necessary, wireless ETCs ought to be given time to seek forbearance from the facilities requirement in Section 214(e)(1)(A) and continue to receive Link Up and Lifeline funding. In this regard, we noted that Commission rules make plain that eligibility for Link Up funding is not dependent on facilities. While the Commission's orders forbearing from the facilities requirement for various ETCs often have resulted in an ETC being denied Link Up funding, those orders establish no rational connection between Link Up and the

¹¹ According to the Administrative Procedure Act a rule is "the whole or a part of an agency statement of general or particular applicability *and future effect* designed to implement, interpret, or prescribe law or policy or describing the organization, procedure, or practice requirements of an agency...." 5 U.S.C. § 551(4) (emphasis added). *See also Bowen v. Georgetown Univ. Hosp.*, 488 U.S. 204 (1988) (affirming holding of the Court of Appeals for the District of Columbia Circuit that "the APA, as a general matter, forbids retroactive rulemaking.").

¹² We note that the Minnesota and Wisconsin Commissions already initiated proceedings regarding the requirements of the new rule. The prospect that such a dramatic rule change could have immediate impact and provide no transition to allow ETCs to adjust business plans and to develop and implement new facilities-based serving models seems so unfair that, if allowed to be interpreted in that manner, it would call into question the credibility of the Commission's rulemaking process.

¹³ *See supra* note 9.

Marlene H. Dortch, Secretary
December 15, 2011
Page Five

facilities requirement from which the Commission regularly has granted forbearance.¹⁴ This is not surprising given that the Commission has found that “the Commission’s traditional concern with a carrier doubling its recovery by reselling facilities that are already supported by the high-cost fund does not apply in the low-income context.”¹⁵ Further, the Commission has determined that “[r]equiring a Lifeline provider to own the facilities it uses to offer service does not necessarily further the statutory goal of the low-income program.”¹⁶ There is no difference between the Lifeline and Link Up aspects of the Low Income program that would require carriers to use their own facilities in order to effectively utilize Link Up funding versus Lifeline funding. Rather, Link Up funding presently is tied to a carrier’s reduction of its customary charge.¹⁷ Although a wireless ETC may wish to utilize its own facilities in part to provide service in order to differentiate its product or achieve cost savings, there is no sound policy rationale for requiring an ETC to use specific facilities to provide Lifeline or Link Up supported services to the low income community.

During the meeting, we also discussed the Commission’s proposed reforms to the Link Up subsidy program in the low income proceeding. Our comments were consistent with the comments and replies filed by the Coalition on August 26, 2011 and September 2, 2011, respectively, in the low income proceeding dockets. Specifically, we discussed the increasing need for Lifeline and Link Up support in low income communities¹⁸ and the role that Coalition members play to reach further and deeper into that market than the Lifeline-only carriers. The Coalition members use a community-based business model built on in-person contact and program-related education. Coalition members generally serve the low income community and the goals of the Low Income program by hosting events at state or county fairs, churches and with agencies that serve low income individuals (e.g., city or state welfare agencies) in order to explain the Commission’s Lifeline program and to offer and initiate wireless services. This more extensive and more expensive distribution model has proven successful in reaching low income consumers not reached by the Lifeline-only carriers.

For example, Coalition members have had tremendous success in signing-up new customers in markets such as Georgia, even though they entered the market years after TracFone did. Indeed, data submitted by the Coalition in its initial comments demonstrates that

¹⁴ See e.g., *CAL Communications, Inc. Petition for Forbearance*, WC Docket No. 09-197, Order, FCC 11-139, ¶ 21 (2011).

¹⁵ *i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, WC Docket No. 09-197, Order, FCC 10-117, ¶ 15 (2010).

¹⁶ *Id.*

¹⁷ See 47 C.F.R. § 54.411(a)(1).

¹⁸ See “Census Shows 1 in 2 People Are Poor or Low-Income,” Associated Press (December 15, 2011), included as Exhibit 2.

Marlene H. Dortch, Secretary
December 15, 2011
Page Six

TracFone's penetration rate generally tops-out at about 20 percent of low income households, leaving the vast majority of the eligible low-income market without and often unaware of Lifeline service.¹⁹

We also responded to Commission staff's questions regarding Cricket which presently/no longer charges an activation fee but instead charges significant amounts for its handsets.²⁰ We explained that while Cricket may in some respects appear to have a broader distribution platform than TracFone, the negligible number of Lifeline customers it has suggests that its model is relatively untested,²¹ even if Cricket has committed to it, which is far from clear.²² Although Cricket does not at this time charge an activation fee, Cricket customers are required to establish a wireless service account, purchase a phone and then apply for Lifeline credit, which can take up to 60 days for approval.²³ Cricket sells its service primarily over the Internet and at its stores. Coalition members are not aware of any Cricket outreach events that reach deep into the low income community in the manner that Coalition members do. In contrast to Cricket, customers of Coalition members are able to show up to an in-person event, establish eligibility, receive a phone (at no charge) and begin using the Lifeline-supported free allotment of minutes. Thus, we believe that Coalition members' Lifeline service offerings are far more accessible to low income consumers, many of whom are likely to reject Cricket's requirement that they pay significant out-of-pocket amounts for a handset and even for service (pending approval of a Lifeline credit).

We also discussed the appropriate benchmark for wireless industry activation fees. The Coalition has established that the post-paid wireless general industry practice is to charge an activation fee of \$35.00 or \$36.00.²⁴ In response to a question from staff, the Coalition looked into activation fees for prepaid wireless service. We found that, although Verizon Wireless charges an activation fee of \$25.00 (or \$35.00 for reactivation) for its prepaid

¹⁹ See Comments of the Link Up for America Coalition, WC Docket No. 11-42 et al. at 17-18 (filed Aug. 26, 2011).

²⁰ The least expensive handset found on Cricket's website was \$29.99. See <http://www.mycricket.com/cell-phones>.

²¹ Over the last seven months, Cricket has averaged around 36,000 Lifeline customers. In contrast, many Coalition members have several hundred thousand Lifeline customers.

²² In 2011, Cricket has collected Link Up funding for customers in Maryland, Missouri and Oregon, indicating that their state ETC designations in these states authorize Link Up subsidies.

²³ See Exhibit 2.

²⁴ See Notice of Oral *Ex Parte* Presentation of the Link Up for America Coalition, WC Docket No. 11-42 at 4 (filed Nov. 14, 2011) ("Coalition November 14th *Ex Parte*").

Marlene H. Dortch, Secretary
December 15, 2011
Page Seven

offerings²⁵ and U.S. Cellular charges a prepaid activation fee of \$50.00,²⁶ many carriers do not break out an activation fee for prepaid customers. Instead, the activation fee appears to be bundled with the cost of the handset and the first bucket of minutes purchased in order to begin service. This can amount to as much as \$80 out-of-pocket to commence service with these prepaid providers²⁷ (Verizon Wireless and U.S. Cellular also tack-on additional charges for handsets) – compared with zero out-of-pocket for Lifeline service offered by Coalition members. The sizeable barrier created by the often large out-of-pocket expenses involved with these prepaid wireless provider plans suggests that they are not intended for most Lifeline customers and that Commission reliance on the stated activation charges for these plans would be misplaced.

In response to questioning from the Commission staff, we explained that Coalition members operate a business model that reaches large underserved portions of the low income market in part by utilizing Link Up. In response to staff's question regarding specific costs wireless CETCs have for commencing service, we confirmed that almost all Coalition members do in fact pay a network activation and provisioning charge from their underlying provider.²⁸ Budget Prepay has similarly confirmed that initiation costs can include an activation fee from the underlying provider.²⁹ We also noted that Coalition members incur significant costs other than those imposed by underlying service providers and made reference to prior Coalition filings containing such data.

We also discussed Coalition members' plans to provide mobile broadband data services as part of their existing Link Up and Lifeline supported offerings. Although it is certainly feasible to provide broadband data services to Lifeline customers, which would count against the customer's allotted minutes, the cost of a broadband-capable smartphone presents a significant barrier. The Commission previously supported handset costs through Link Up funding and it should do so again, especially given that smartphones effectively function as an extension of a carrier's network.³⁰

Finally, we explained the voluntary self-regulatory efforts the Coalition's has undertaken to control waste, fraud and abuse. We highlighted the Coalition's voluntary Code of

²⁵ See Exhibit 3.

²⁶ See Exhibit 4.

²⁷ Handset process and service plan specific and prices vary widely.

²⁸ See Reply Comments of the Link Up for America Coalition, WC Docket No. 11-42 et al. at 6 (filed Sept. 2, 2011).

²⁹ See Comments of Budget Prepay, WC Docket No. 11-42 et al. at 8 (filed Aug. 26, 2011).

³⁰ See Coalition November 14th *Ex Parte* at 3.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
December 15, 2011
Page Eight

Conduct, which was based largely on the conditions that the Commission has imposed on other ETCs in the context of forbearance petitions to address duplicate benefits,³¹ and the Coalition's ongoing implementation of an interim de-duping process to address duplicates in advance of a Commission ordered database solution.³² The Coalition believes these initiatives will produce significant near-term reductions in waste, fraud and abuse in the Lifeline and Link Up programs. We have worked with the Bureau on improving the implementation of these measures and look forward to continuing our coordination with the Bureau in an effort to achieve good results.

In accordance with the Commission's rules, this letter 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

cc: Chairman Julius Genachowski
Zachary Katz
Commissioner Michael Copps
Lisa Hone
Commissioner Mignon Clyburn
Angela Kronenberg
Commissioner Robert McDowell
Christine Kurth
Carol Matthey
Trent Harkrader
Kim Scardino
Patrick Halley
Garnet Hanley

³¹ See Notice of Written *Ex Parte* Presentation of the Link Up for America Coalition, WC Docket No. 11-42 (filed Oct. 3, 2011).

³² See *id.*

EXHIBIT 1

Preserving Link Up for Low Income Americans

WC Docket No. 11-42

Link Up for America Coalition
December 5, 2011

Link Up for America Coalition

- **The Coalition members include the following facilities-based wireless CETCs:**
 - Assist Wireless, Global Connections of America, NewPhone, Ready Wireless, Tag Mobile, Telrite/Life Wireless, Absolute Home Phones and Affordable Phone
- **Our goals are to preserve Link Up for low income Americans and to be good stewards of the Fund by eliminating waste, fraud and abuse**
 - Coalition members have instituted a voluntary Code of Conduct and Interim De-Duping Process that will save the Fund millions prior to implementation of a permanent database solution
 - TerraCom and YourTel also have committed to these voluntary self-regulatory programs

Link Up Is a Success Story

- **Link Up was established to remove low income consumer penetration barriers presented by customary activation charges**
 - The Commission repeatedly has touted the success of Link Up, calling it “critical” as recently as March
- **ETC competition brings benefits to low income consumers and the Fund**
 - Coalition members have driven subscribership rates up using legitimate business plans incorporating in-market outreach and extensive in-person customer activation programs
- **Link Up is a revenue replacement mechanism**
 - Wireless CETCs use Link Up subsidies to reduce their customary charges
- **Link Up is competitively neutral and technology neutral and should remain so**
 - It is not unfair to carriers ineligible for Link Up
 - It is not a wireline only program

Where We Stand

- **The Coalition does not support the elimination of Link Up**
 - The record does not support eliminating Link Up as it would drive down penetration rates for low income consumers
 - General wireless industry practice is to charge an activation fee of approximately \$35.50
 - *e.g.*, AT&T Mobility (\$36), Verizon Wireless (\$35), Sprint (\$36), T-Mobile (\$35), CellularOne (\$40), SouthernLinc (\$35), Cincinnati Bell (\$35), Qwest Wireless (\$35)
 - The Commission originally set the Link Up cap at \$30 based on national average connection charges of \$45.17
 - Therefore, if the Commission reduces the Link Up cap for wireless, the appropriate cap would be \$24 (\$45.17 is to \$30 as \$35.50 is to \$23.58)
 - Any amount lower for wireless services would not be competitively or technology neutral

Where We Stand

- **The Coalition supports modernization of Link Up**
 - A permanent database solution will address most Link Up waste, fraud and abuse
 - The Commission should expand Link Up for broadband
 - Implementation of reforms must include guidance to avoid administrative uncertainty and allow CETCs sufficient time to change customer-facing materials and business plans

Where We Stand

- **Customary charges**
 - We agree that customary charges are the stated charges ordinarily imposed on customers in a state and are not imposed only on Lifeline/Link Up customers
 - We do not agree that customary charges should be defined to exclude charges waived, reduced or eliminated
 - Many states require CETCs to waive customary charges not covered by the Link Up subsidy
 - Waivers, reductions and credits/elimination of these charges benefit low income consumers and serve the goal of the fund
 - Restrictions on CETCs' ability to waive, reduce or credit customary charges would be unreasonably discriminatory...further, it would be bad public policy
 - The Commission should focus on what's good for low income consumers and not on what's good for certain CETCs
 - Some CETCs chose not to rely on or are ineligible for Link Up
 - Coalition members and their low income customers are using Link Up as it was intended to be used

Setting the Record Straight on Costs

- **Link Up is not now and never has been limited to the costs of “truck rolls” or other physical installation of facilities**
 - Such a limitation would effectively eliminate Link Up for wireless providers
- **Parties claiming reduced customer activation costs have not provided data to support their claims**
 - Coalition data shows that costs remain substantial
 - FCC statistics show that activation charges remain about the same
 - Most wireline and wireless carriers impose activation charges on new customers
 - There are a few exceptions

Setting the Record Straight on Costs

- **Detractors are wrong with respect to costs supported by the Link Up revenue recovery mechanism – a whole lot more than “flipping the switch” was contemplated**
 - Administrative costs for account and phone setup and customer initial order fulfillment, new customer activation and provisioning, and initial setup for customer support and office support services
 - The Tribal Order extended the realm of costs contemplated by the Link Up revenue recovery mechanism to include
 - Truck rolls/facilities installation
 - Handsets (partial; reconsidered several years later)
 - The 2010 Joint Board Recommended Decision implies that outreach costs are contemplated by the current Link Up revenue recovery mechanism
 - The Act and FCC rules require outreach
- **The Commission can and should choose to expand Link Up support for broadband-capable handsets**

Fact or Fiction

- Fiction: Link Up is only for connections
 - *Fact: FCC has said Link Up is for the replacement of foregone revenue from activation charges applied to recover service commencement costs, including (but not limited to) administrative costs*
- Fiction: Link Up is only for residential/landline phone lines
 - *Fact: FCC has said Link Up is available for wireless ETCs*
- Fiction: Link Up is not intended to cover outreach
 - *Fact: Joint Board has said ETCs have outreach requirements because Link Up/Lifeline subsidies go to them*
 - *Fact: Some ETCs use Link Up to support marketing (CenturyLink says its activation charges include recovery for overhead, including marketing)*
- Fiction: Coalition members are not facilities-based CETCs
 - *Fact: At least fourteen state public utility commissions disagree*
 - *Fact: In accordance with the Act, members use a combination of their own facilities and resale to provide wireless Lifeline service*

Fact or Fiction

- Fiction: CETC activation charges can't be customary, because they factor in costs associated with serving Lifeline customers or are imposed only on Lifeline customers
 - *Fact: Coalition members do not impose activation charges exclusively on Lifeline customers*
 - *Fact: FCC's rules permit the establishment of charges based on average costs to serve different classes of customers*
- Fiction: customary charges cannot be customary, if they are waived
 - *Fact: Many states require that customary charges be waived*
 - *Fact: This does not make the charge something other than customary*
 - *Fact: AT&T agrees that state waiver requirements should not render an ETC ineligible for Link Up funding*

Fact or Fiction

- Fiction: Big ETCs' success in signing-up Lifeline customers without Link Up support shows that Link Up is not needed
 - *Fact: FCC has said that Link Up is critical; Joint Board has said that Link Up is essential*
 - *Fact: more Low Income Consumers are being reached by Link Up eligible ETCs*
 - *Fact: ETC competition is good for low income consumers and the Fund*
 - *Fact: TracFone's cream-skimming model has limited reach and appeal*
 - *Fact: Coalition members' outreach and in-person activation programs involve and employ people in poor communities, providing in-person education about the Lifeline/Link Up program and in-person instruction about how to use our handsets*

Fact or Fiction

- Fiction: Customer activation costs have decreased significantly over time
 - *Fact: There is no evidence in the record to support this claim; the evidence shows that standard industry practice is to charge a \$35-\$36 activation fee*
- Fiction: there is no justification for keeping Link Up given declining costs and increased flexibility in establishing per minute charges to recover costs (in other words – raise per minute rates for low income consumers)
 - *Fact: record evidence does not support the declining cost assertion*
 - *Fact: sure, we can raise rates, but some customers won't be able to pay higher rates and subscription levels will go down – not good for low income consumers, us or the Commission*

What the Commission Should Do

- **Adopt a permanent data base solution**
- **Preserve Link Up**
 - Reject proposals to eliminate Link Up
 - Make any reduction in the wireless Link Up cap proportional to the cap for wireline based on average wireless industry activation fees of \$35-\$36
 - Clarify that customary charges can include those that are waived, reduced or eliminated for the benefit of low income Americans
 - Reject calls to impose new facilities requirements on wireless CETCs
- **Issue an FNPRM**
 - We support modernization of Link Up, based on cost and market data and solid understanding of how various proposals will increase low income consumer subscribership
 - We support extending Lifeline and Link Up to support broadband, including support for broadband-capable handsets

Thank You

Link Up for America Coalition

c/o John Heitmann
Kelley Drye & Warren LLP
jheitmann@kelleydrye.com
202.342.8544

EXHIBIT 2

Census shows 1 in 2 people are poor or low-income

By Hope Yen

Associated Press / December 15, 2011

WASHINGTON—Squeezed by rising living costs, a record number of Americans -- nearly 1 in 2 -- have fallen into poverty or are scraping by on earnings that classify them as low income.

The latest census data depict a middle class that's shrinking as unemployment stays high and the government's safety net frays. The new numbers follow years of stagnating wages for the middle class that have hurt millions of workers and families.

"Safety net programs such as food stamps and tax credits kept poverty from rising even higher in 2010, but for many low-income families with work-related and medical expenses, they are considered too `rich' to qualify," said Sheldon Danziger, a University of Michigan public policy professor who specializes in poverty.

"The reality is that prospects for the poor and the near poor are dismal," he said. "If Congress and the states make further cuts, we can expect the number of poor and low-income families to rise for the next several years."

Congressional Republicans and Democrats are sparring over legislation that would renew a Social Security payroll tax reduction, part of a year-end political showdown over economic priorities that could also trim unemployment benefits, freeze federal pay and reduce entitlement spending.

Robert Rector, a senior research fellow at the conservative Heritage Foundation, questioned whether some people classified as poor or low-income actually suffer material hardship. He said that while safety-net programs have helped many Americans, they have gone too far. He said some people described as poor live in decent-size homes, drive cars and own wide-screen TVs.

"There's no doubt the recession has thrown a lot of people out of work and incomes have fallen," Rector said. "As we come out of recession, it will be important that these programs promote self-sufficiency rather than dependence and encourage people to look for work."

Mayors in 29 cities say more than 1 in 4 people needing emergency food assistance did not receive it. Many formerly middle-class Americans are dropping below the low-income threshold -- roughly \$45,000 for a family of four -- because of pay cuts, a forced reduction of work hours or a spouse losing a job.

States in the South and West had the highest shares of low-income families, including Arizona, New Mexico and South Carolina, which have scaled back or eliminated aid programs for the needy. By raw numbers, such families were most numerous in California and Texas, each with more than 1 million.

The struggling Americans include Zenobia Bechtol, 18, in Austin, Texas, who earns minimum wage as a part-time pizza delivery driver. Bechtol and her 7-month-old baby were recently evicted from their bedbug-infested apartment after her boyfriend, an electrician, lost his job in the sluggish economy.

After an 18-month job search, Bechtol's boyfriend now works as a waiter and the family of three is temporarily living with her mother.

"We're paying my mom \$200 a month for rent, and after diapers and formula and gas for work, we barely have enough money to spend," said Bechtol, a high school graduate who wants to go to college. "If it weren't for food stamps and other government money for families who need help, we wouldn't have been able to survive."

About 97.3 million Americans fall into a low-income category, commonly defined as those earning between 100 and

199 percent of the poverty level, based on a new supplemental measure by the Census Bureau that is designed to provide a fuller picture of poverty. Together with the 49.1 million who fall below the poverty line and are counted as poor, they number 146.4 million, or 48 percent of the U.S. population. That's up by 4 million from 2009, the earliest numbers for the newly developed poverty measure.

The new measure of poverty takes into account medical, commuting and other living costs as well as taxes. Doing that pushed the number of people below 200 percent of the poverty level up from the 104 million, or 1 in 3 Americans, that was officially reported in September.

Broken down by age, children were most likely to be poor or low-income -- about 57 percent -- followed by seniors 65 and over. By race and ethnicity, Hispanics topped the list at 73 percent, followed by blacks, Asians and non-Hispanic whites.

Even by traditional measures, many working families are hurting.

Following the recession that began in late 2007, the share of working families who are low income has risen for three straight years to 31.2 percent, or 10.2 million. That proportion is the highest in at least a decade, up from 27 percent in 2002, according to a new analysis by the Working Poor Families Project and the Population Reference Bureau, a nonprofit research group based in Washington.

Among low-income families, about one-third were considered poor while the remainder -- 6.9 million -- earned income just above the poverty line. Many states phase out eligibility for food stamps, Medicaid, tax credit and other government aid programs for low-income Americans as they approach 200 percent of the poverty level.

The majority of low-income families -- 62 percent -- spent more than one-third of their earnings on housing, surpassing a common guideline for what is considered affordable. By some census surveys, child-care costs consume close to another one-fifth when a mother works.

Paychecks for low-income families are shrinking. The inflation-adjusted average earnings for the bottom 20 percent of families have fallen from \$16,788 in 1979 to just under \$15,000, and earnings for the next 20 percent have remained flat at \$37,000. In contrast, higher-income brackets had significant wage growth since 1979, with earnings for the top 5 percent of families climbing 64 percent to more than \$313,000.

A survey of 29 cities conducted by the U.S. Conference of Mayors released Thursday points to a gloomy outlook for those on the lower end of the income scale.

Many mayors cited the challenges of meeting increased demands for food assistance, expressing particular concern about possible cuts to federal programs such as food stamps and WIC, which assists low-income pregnant women and mothers. Unemployment led the list of causes of hunger in cities, followed by poverty, low wages and high housing costs.

Across the 29 cities, about 27 percent of people needing emergency food aid did not receive it. Kansas City, Mo.; Nashville, Tenn.; Sacramento, Calif.; and Trenton, N.J., were among the cities that pointed to increases in the cost of food and declining food donations. Mayor Michael McGinn in Seattle cited an unexpected spike in food requests from immigrants and refugees, particularly from Somalia, Burma and Bhutan.

Among those requesting emergency food assistance, 51 percent were in families, 26 percent were employed, 19 percent were elderly and 11 percent were homeless.

"People who never thought they would need food are in need of help," said Mayor Sly James of Kansas City, Mo., who co-chairs a mayors' task force on hunger and homelessness.

Census Bureau: <http://www.census.gov>

U.S. Conference of Mayors: <http://www.usmayors.org/>

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EXHIBIT 3

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Federal Cricket Lifeline Credit for California Residents

Posted 1/24/2011 at 3:48 PM | Source Cricket

What is the federal Cricket Lifeline Credit?

Lifeline is a government program that grants eligible individuals a credit each month on their phone bill. Millions of Americans benefit from this credit. Eligible customers may receive the Lifeline credit for landline or wireless service, but the credit is available for only one phone line per household. Cricket now offers a \$13.50 federal Cricket Lifeline Credit to our California Cricket Wireless customers; the federal Cricket Lifeline Credit is not available for Cricket Broadband or Cricket PAYGo service.

How can I qualify for the federal Cricket Lifeline Credit?

If you are a resident of California, you may qualify for the federal Cricket Lifeline Credit by one of two methods. Method 1 is program-based; if you or another person in your household is enrolled in at least one of the public

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FEDERAL DISCOUNTS
ON YOUR
WIRELESS SERVICE**

assistance programs listed below, you may qualify. Method 2 is income-based; you may also qualify if your household's total annual gross income is at or below the annual income limits listed below.

METHOD 1: PROGRAM-BASED

Medicaid/Medi-Cal

LIHEAP (Low-Income Home Energy Assistance Program)

SSI (Supplemental Security Income)

Section 8 (Federal Public Housing Assistance)

SNAP (Supplemental Nutrition Assistance Program)

WIC (Women, Infants, and Children Program)

Healthy Families Category A

NSLP (National School Lunch Program)

TANF (Temporary Assistance for Needy Families

- **CalWORKs** (California Work Opportunity and Responsibility to Kids)

- **StanWORKs** (Stanislaus County Work Opportunity and Responsibility to Kids)

- **WTW** (Welfare-to-Work)

- **GAIN** (Greater Avenues for Independence)

Bureau of Indian Affairs General Assistance

Head Start Income Eligible (Tribal Only)

Tribal TANF

METHOD 2: INCOME-BASED

One or Two Person Household: \$24,000

Three Person Household: \$28,200

Four Person Household: \$34,000

More Than Four Person Household: \$34,000, plus \$5,800 for each additional household member

How do I apply?

If you don't have Cricket Wireless service already, you must activate a new account before you can apply for the federal Cricket Lifeline Credit. Once you have Cricket Wireless service, you can start the application process for the federal Cricket Lifeline Credit at a Cricket Corporate-Owned Store or an Exclusive Cricket Dealer. Just complete and sign the federal Cricket Lifeline Credit request form (available in

Sign Up

Create an account or **log in** to see what your friends are recommending.



Best Websites for Finding Android Apps

35 people recommend this.

Cell Phone Plans | Cell Phones | Mobile Broadband | Cricket Wireless

2 people recommend this.



12 Days of Cricket Giveaway!

23 people recommend this.

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stores or by clicking the Download More Information link at the bottom of this page) and show a government-issued photo ID. Within three weeks, an application form will be mailed to you in a PINK envelope. You must complete, sign, and submit the application form along with any required documentation before the due date.

When will I get my federal Cricket Lifeline Credit?

You will be billed the regular rates for Cricket Wireless phone service until your application is approved. Once your application is approved, you will receive a letter of approval, and Cricket will add the federal Cricket Lifeline Credit to your account. Your first credit will be retroactive to the date your service began or the date you requested the federal Cricket Lifeline Credit, whichever is later. You should see this credit within 60 days of being approved for the federal Cricket Lifeline Credit. If you haven't received this credit by your second full month of service, just come back to the store for help. After you receive the credit, if you have a net credit balance of \$10 or more, you may request a refund check from Cricket.

How long can I keep my federal Cricket Lifeline Credit?

Your Lifeline eligibility lasts for one year. You will continue to receive the federal Cricket Lifeline Credit for a year, unless you request the federal Cricket Lifeline Credit be removed from your account, you are found to no longer be eligible, or you change phone service providers (if you change service providers, you will have 30 days to transfer Lifeline to your new provider).

You must renew your participation annually. Each year, you will receive a renewal form in a PINK envelope. You may choose to continue your enrollment under any eligible method shown above, regardless of which method you used to apply for the current year. If you do not renew, Cricket will remove the federal Cricket Lifeline Credit from your account, and your future bills will reflect the regular rates for Cricket Wireless phone service.

What does the federal Cricket Lifeline credit mean for me?

When you take advantage of the federal Cricket Lifeline Credit, Cricket service delivers even more value for the dollar. Step up to a higher-value rate plan, add a feature bolt-on you've always wanted, or just enjoy the savings each month!

Are there any restrictions?

Lifeline can be applied to only one phone line per household. To receive the federal Cricket Lifeline Credit, you must be a resident of California, you must live in Cricket's designated service area, you must meet the eligibility rules, and you cannot be claimed as a dependant on another person's income tax return.

Where can I learn more?

You may visit one of the Cricket Corporate-Owned Stores or Exclusive Cricket Dealers listed (visit mycricket.com/locations to find these locations on a map).

Cricket Lifeline Credit Locations

Central Valley

Clovis: 1050 Shaw Avenue, Suite 1049, 93612

Clovis: 151 W. Bullard Avenue, #100A, 93612

Clovis: 605 W. Shaw Avenue, Suite B, 93612

Dinuba: 647 W. El Monte Way, #D, 93618

Fresno: 1135 Fresno Street, 93706

Fresno: 1440 W. Ashlan Avenue, 93705

Fresno: 3602 Blackstone Avenue, Suite 117, 93726

Fresno: 3759 W. Shaw Avenue, #103, 93711

Fresno: 3890 N. Cedar Avenue, Suite 105, 93726

Fresno: 432 E. Shaw Avenue, 93710

Fresno: 4993 E. Kings Canyon Road, Suite 102, 93727

Fresno: 6460 N. Blackstone Avenue, Suite 101, 93710

Hanford: 1675 W. Lacey Boulevard, Kiosk #T32, 93230

Madera: 1475 N. Country Club Drive, #102, 93639

Merced: 1248 W. Olive Avenue, 95348

Merced: 2012 G Street, 95340

Modesto: 3430 Tully Road, #46, 95350

Pinedale: 7273 N. Blackstone Avenue, #101, 93650

Porterville: 977-B W. Henderson Avenue, 93257

Reedley: 941 W. Manning Avenue, 93654

Sanger: 2635 Jensen Avenue, 93657

Selma: 2730 Whitson Avenue, 93662

Tulare: 1283 E. Prosperity Avenue, 93274

Turlock: 1815 Countryside Drive, 95380

Visalia: 1637 E. Noble Avenue, 93277

Visalia: 1933 N. Dinuba Boulevard, 93291

Visalia: 2313 S. Mooney Boulevard, 93277

Visalia: 3522 S. Mooney Boulevard, 93277

San Diego

Carlsbad: 1818 Marron Road, Suite 102, 92008

Chula Vista: 1090 3rd Avenue, Unit 2C, 91911

Chula Vista: 1285 Broadway, Suite 103, 91911

Chula Vista: 263 E. Orange Avenue, #5, 91911

Chula Vista: 645 H Street, Suite F-F, 91911

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Chula Vista: 962 Eastlake Parkway, 91914
El Cajon: 1110 Broadway, #106, 92021
El Cajon: 250 S. Marshall Avenue, 92020
El Cajon: 375 N. Second Street, Suite 102-103, 92021
El Cajon: 393 E. Chase Avenue, 92020
El Cajon: 415 Parkway Plaza #9001, 92020
Escondido: 132 W. El Norte Parkway, 92026
Escondido: 1511 E. Valley Parkway, #A2, 92027
Escondido: 245 W. Washington Avenue, 92025
Escondido: 410 W. Felicita Avenue, Suite J, 92025
Lakeside: 12346 Woodside Avenue, 92040
Lemon Grove: 3445 Lemon Grove Avenue, 91945
Lemon Grove: 6902 Federal Boulevard, 91945
National City: 1000 Highland Avenue, 91950
National City: 1610 E. 8th Street, #A, 91950
National City: 2401 Highland Avenue, #107, 91950
National City: 4 N. Euclid Avenue, #D, 91950
Oceanside: 2023 Mission Avenue, Suite E, 92058
Oceanside: 236 S. Coast Highway, 92054
Poway: 12674 Poway Road, 92064
San Diego: 1075 11th Avenue, 92101
San Diego: 1151 Garnet Avenue, 92109
San Diego: 1490 S. 43rd Street, Suite D-E, 92113
San Diego: 1640 Camino Del Rio North, #9006, 92108
San Diego: 1726 Euclid Avenue, 92105
San Diego: 1824 Coronado Avenue, 92154
San Diego: 1879 Logan Avenue, Suite J, 92113
San Diego: 2475 Broadway, 92102
San Diego: 2850 El Cajon Boulevard, 92104
San Diego: 3445 Midway Drive, #A, 92110
San Diego: 3582 National Avenue, Suite 1, 92113
San Diego: 3648 University Avenue, 92104
San Diego: 4340 Genesee Avenue, #108, 92117
San Diego: 4485 El Cajon Boulevard, 92115
San Diego: 4622 College Avenue, Suite B, 92115
San Diego: 4686 Market Street, #E21, 92102
San Diego: 4915 Convoy Street, 92111
San Diego: 5399 El Cajon Boulevard, 92115
San Diego: 5430 Clairemont Mesa Boulevard, Suite A, 92117
San Diego: 6171 Mission Gorge Road, #108, 92120
San Diego: 6201-B Imperial Avenue, 92114

- San Diego:** 6937 Linda Vista Road, Suite #D, 92111
- San Diego:** 7034 El Cajon Boulevard, 92115
- San Diego:** 9480 Mira Mesa Boulevard, 92126
- San Diego:** 989 5th Avenue, Suite A, 92101
- San Marcos:** 204 S. Rancho Santa Fe Road, 92078
- San Marcos:** 218 W. San Marcos Boulevard, Suite 108, 92069
- San Marcos:** 745 Nordahl Road, Suite 110, 92069
- San Ysidro:** 342 W. San Ysidro Boulevard, 92173
- San Ysidro:** 700 E. San Ysidro Boulevard, 92173
- Santee:** 9535 Mission Gorge Road, #L, 92071
- Spring Valley:** 8300 Paradise Valley Road, Suite 127, 91977
- Spring Valley:** 9565 Jamacha Boulevard, 91977
- Spring Valley:** 9805 Campo Road, #140, 91977
- Vista:** 1021 N. Santa Fe Avenue, 92084
- Vista:** 1037 E. Vista Way, 92084
- Vista:** 1851 W. Vista Way, 92083
- Vista:** 902 S. Santa Fe Avenue, Suite A1, 92084



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EXHIBIT 4

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 - [View All](#)

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[Check Text Message](#)

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[Manage Ringback Tones](#)

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Prepaid Wireless Plans, Verizon Prepaid Plans

Verizon Wireless Prepaid Daily Plans

Unlimited Mobile to Mobile Calling – Connect with more than 80 million Verizon Wireless customers on select plans.

[View All Included Features](#)

Domestic Text Messaging – 20¢ per message (per recipient), including to Canada, Mexico and Puerto Rico.

Domestic Picture, Video and Voice Messaging – 25¢ per message sent (per recipient) or received, including Canada, Mexico and Puerto Rico.

Select a Plan	Daily Access (only on days used)	Mobile to Mobile Calling	Night & Weekend Minutes [?]	Each Additional Minute	Text Rates (per message sent per recipient & received)
<input type="radio"/>	\$1.99	Unlimited	Unlimited	Unlimited	2¢
<input type="radio"/>	\$0.99	Unlimited	10¢	10¢	10¢
<input type="radio"/>	\$0.00	25¢/min	25¢/min	25¢/min	20¢

Refill Expiration (once applied to the account)

\$15-\$29.99 expires in 30 days

\$30-\$74.99 expires in 90 days

\$75-\$99.99 expires in 180 days

\$100 or more expires in ONE YEAR!

Additional Calling Plan Information

More International Bundles Available

[Coverage Map](#) **\$20/month for Unlimited Messaging to anyone on any network in the U.S.***

[International Calling and Text Messages](#) **\$10/month for Unlimited Mobile to Mobile Messaging with Verizon Wireless customers PLUS 250 additional messages**

[Prepaid Monthly Plans](#) V CAST Music with Rhapsody – 99¢ / song via PC; \$1.99 / song via phone; 99¢ download fee**

[Brochures](#) Ringback Tones – 99¢ per month & \$1.99 per Ringback Tone/Year

[Picture and Video Messaging](#) – 25¢ per message sent and received

Mobile Web – 99¢ per day of use (24-hour period)

Domestic Long Distance Included (airtime charges apply)

Domestic Roaming Rate is 20¢ Per Minute

Existing Customers

International Text Messaging – 25¢ per message sent, messages received are same as calling plan

[Sign in to My Verizon](#) International Roaming – Voice Calls

– 69¢/min in Puerto Rico, Canada & US Virgin Islands

[Add Minutes](#) – 99¢/min in Mexico

[Buy Prepaid Cards](#) – \$1.99/min in Bermuda

International Roaming – Text Messaging

[Find Prepaid Locations](#) – 50¢ per message sent

– 5¢ per message received

[Activate Service](#) Search – \$1.99 per call plus airtime

Up to \$25 activation fee may apply.

[Activate your new Prepaid phone online](#)

Additional and Unlimited Messages apply when sending and receiving: (i) Instant Messages, Text Alerts and Picture and Video Messaging Portal Messages; (ii) Messages with non-Verizon Wireless customers in the United States or participating networks in Canada, Mexico and Puerto Rico; or (iii) via email. Unlimited Messages also include Mobile to Mobile Messages with Verizon Wireless Customers. For Additional Messages, overage Messaging rates default to those of your Calling Plan. Premium Messaging programs and International Messaging not included.

** A 99¢ download fee applies in addition to song price on 1st purchase in any 24-hour period – (phone purchases only). For songs purchased from the phone, a second copy of the song is available for download from the V CAST Music with Rhapsody Online Store account on your PC. Browsing, previewing, and downloading music on your phone will not use airtime. See Prepaid Customer Agreement brochure for complete terms and conditions.

Mobile to Mobile, Night Minutes, Weekend Minutes and Per-Minute Rate are for use from within the Verizon Wireless Prepaid Rate and Coverage Area. Daily Access will be charged and deducted from your account only on days you make or receive calls and is valid until 11:59 p.m. Daily Access of \$0.99 and \$1.99 calls rated at per minute rate and other charges for available services on your prepaid plan may deplete balance prior to its expiration. You will not be able to make or receive voice calls if you do not have the amount required for your daily access. Your account balance will expire at 12:01 a.m. on the day stated at the time of replenishment. To carry your balance forward, simply refill your account before your expiration date. If balance expires, unused portion will be

forfeited. Verizon Wireless will suspend your service when your account reaches \$0 or your account reaches the expiration date. Unlimited Mobile to Mobile, Night and Weekend Minutes are not available when your account has been suspended. Limit of 4 calling plan changes in a 30-day period.

Important Information:

All terms, conditions and obligations of the Verizon Wireless Prepaid Customer Agreement and Calling Plan, which cover all the details of your prepaid service, shall govern the terms of your service. Please read and understand this material before activating or using your phone. Verizon Wireless calling plans, rate areas, agreement provisions, business practices, procedures and policies are subject to change as specified in the Verizon Wireless Prepaid Customer Agreement. Our liability is significantly limited. Customers must replenish their account by providing Verizon Wireless with another payment. Any balance remaining at expiration will be removed from the account. Your wireless number is subject to termination after the expiration period, at which time up to a \$35 account activation fee may apply to re-establish service. Existing Verizon Wireless prepaid customers will forfeit any unused bonus minutes in their account when changing to a prepaid Calling Plan.

You will forfeit the money in your account if you activated service without a Refill Card and did not make a call within 60 days. You must initialize the account. If activating the account with a Refill Card, the card is not valid unless initialized (using the PIN) by the date marked on the back of the card.

Toll and airtime free numbers are **911**, **#PAY (#729)** and ***611**. If a charge depends on an amount of time used, we'll round up any fraction of a minute to the next full minute. Time starts when you first press **SEND** or the call connects to a network on outgoing calls and when the call connects to a network (which may be before it rings) on incoming calls. Time may end several seconds after you press **END** or the call otherwise disconnects. For calls that are made on our network, we only bill for calls that connect (which includes calls answered by machines). Charge per call for 411 Search may vary when not in the Verizon Wireless Prepaid Rate and Coverage Area.

Service availability dependent on phone model. Prepaid pricing not available with analog-only phones. Some Verizon Wireless services and features require a CDMA tri-mode or All-Digital phone with Verizon Wireless software. Included features and services may not be available when outside the Prepaid Rate and Coverage Area. V CAST (Video & Mobile TV), New Every Two®, Extended Warranty, Wireless Phone Protection, Total Equipment Coverage, Roadside Assistance, Detailed Billing and Enhanced Voice Mail are not available on the Verizon Wireless Prepaid Calling plans. Please see the Verizon Wireless Prepaid brochures for full details of the prepaid service.

Verizon Wireless Mobile to Mobile Calling

If Caller ID is not present or Caller ID Block is initiated, Mobile to Mobile does not apply to incoming calls and will apply to outgoing calls only. Mobile to Mobile is not available to customers whose wireless exchange restricts the delivery of Caller ID or with fixed wireless devices with usage substantially from a single cell site. Mobile to Mobile does not apply if call forwarding or no answer/busy transfer features are activated or to data usage, calls to check your voice mail and calls to Verizon Wireless customers using Airfone Service or any of the VZGlobal services.

Get It Now/Media Center

Use of Get It Now/Media Center is subject to the Get It Now/Media Center License and User Agreements. An approved Verizon Wireless Prepaid Get It Now-capable phone and a connection in the Prepaid All-Digital Rate and Coverage Area is required. Not all

applications available with Verizon Wireless Prepaid Calling Plans. Additional fees apply. See www.verizonwireless.com/getitnow for more information. For Mobile Web, the services are charged at 99¢ per day only on the days it is used. You will have unlimited use of the services for a 24-hour period. Coverage limitations in maps at www.verizonwireless.com/coveragelocator

Refunds

REFUNDS WILL BE GRANTED WITHIN 14 DAYS OF THE ORIGINAL DATE OF PURCHASE WITH THE ORIGINAL SALES RECEIPT. AT THE TIME OF THE RETURN, THE CUSTOMER WILL RECEIVE A FULL REFUND FOR THE AMOUNT OF THE EQUIPMENT ONLY.

Connecticut Customers: If you have any questions about your bill or concerns about your service, please call Customer Care at: 1-888-294-6804 or dial *611 from your wireless phone. If you are a Connecticut customer and we cannot resolve your issue, you have the option of contacting the Department of Public Utility Control (DPUC): Online: www.state.ct.us/dpuc Phone: 866-381-2355; Mail: Connecticut DPUC, 10 Franklin Square, New Britain, CT 06051.

Last Update 05/05/11

Chat with a Sales Associate [Chat Now](#)

Browse prepaid wireless plans from Verizon Wireless to choose the right prepaid plan to meet your needs. Our selection of prepaid wireless plans lets you choose between payment options, with different phone and messaging rates. Plus many of our prepaid plans offer unlimited Mobile to Mobile calling. And, you can get great phones on our plans like the [LG Accolade](#) and [Samsung Gusto](#) !

EXHIBIT 5

LIVE CHAT

NEED HELP PLACING YOUR ORDER?
ASSOCIATES ARE ONLINE

Valid on postpaid and select prepaid plan purchases made through the website.

FREE SHIPPING
EVERY DAY ON ALL
ONLINE ORDERS 

PLAN DETAIL



Earn Belief Points for being a customer and redeem them for ringtones, accessories, faster phone upgrades and more. Get 150 additional points for every six months of membership.

Prepaid Pay-As-You-Go

INCLUDED FEATURES

- 10¢ per minute
- My Contacts Backup
- Pay-As-You-Go Messaging: \$0.25/message
- Much more (see plan details below)

\$50 Activation Fee

Base Plan Price

\$10.00

TOTAL
\$10.00

[PLAN DETAILS](#)

[PLAN FEATURES](#)

Speak without limits.

If you only use your phone occasionally, this may be the plan for you. If you send a lot of Texts or make frequent calls, consider one of our unlimited Prepaid plans.

Included for free with this plan

- Voice Mail
- Call Waiting
- Caller ID
- Three-Way Calling
- Unlimited Incoming Texts, Pix and Video Messages

Discover the Difference

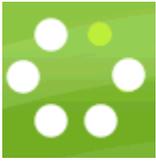
And as always, you can put our network and customer service to the test risk free for 15 days.

Things We Want You To Know (Disclaimer)

DEVICE PROTECTION

Coverage in case your phone or wireless modem is lost, stolen or damaged.

\$5.95 **PER MONTH**



ONE MOMENT PLEASE...