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

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
Universal Service Support	)	
	)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization	)	
	)	
Tele Circuit Network Corporation	)	
Compliance Plan	)	

**TELE CIRCUIT NETWORK CORPORATION'S WIRELINE COMPLIANCE PLAN**

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**TABLE OF CONTENTS**

- I. INTRODUCTION ..... 1
- II. BACKGROUND ..... 2
- III. TELE CIRCUIT WILL COMPLY WITH THE REQUIREMENTS SET FORTH  
IN THE ORDER..... 3
  - A. Access to 911 and E911 Services..... 3
  - B. Consumer Eligibility and Enrollment ..... 3
    - 1. One-Per-Household..... 4
    - 2. Initial and Annual Certification ..... 6
    - 3. Annual Re-Certification..... 11
  - C. Other Reforms to Eliminate Waste, Fraud and Abuse..... 12
    - 1. National Lifeline Accountability Database..... 14
    - 2. Toll Limitation Service ..... 14
    - 3. Marketing & Outreach ..... 15
    - 4. Audits ..... 16
  - D. De-Enrollment..... 16
  - E. Additional Rule Amendments..... 17
    - 1. Terms and Conditions of Service..... 17
    - 2. Reporting Requirements ..... 18
    - 3. Reimbursement from USAC..... 18
    - 4. Section 54.202 Certifications..... 18
- IV. COMPANY INFORMATION..... 19
  - A. Names and Identifiers ..... 19
  - B. Financial and Technical Capability ..... 19
  - C. Lifeline Offering..... 20
- V. CONCLUSION..... 21

**TABLE OF EXHIBITS**

	<u>Exhibit</u>
Sample Lifeline Certification Form.....	A
Sample Advertisement.....	B
Key Management Resumes.....	C
Proposed Lifeline Rate Plans.....	D

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**TELE CIRCUIT NETWORK CORPORATION’S WIRELINE COMPLIANCE PLAN**

**I. INTRODUCTION**

Tele Circuit Network Corporation (“Tele Circuit” or the “Company”) is a prepaid competitive local exchange telecommunications carrier (“CLEC”) seeking designation as an Eligible Telecommunications Carrier (“ETC”) solely for the purpose of participating in the Lifeline program.<sup>1</sup> Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission (“FCC” or “Commission”) has forborne from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.<sup>2</sup> Tele Circuit currently provides service in part over its own facilities through the use of unbundled network elements (UNEs). According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities (including UNEs) and resale of another carrier’s services.<sup>3</sup>

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<sup>1</sup> Tele Circuit currently has a Compliance Plan pending for its wireless operations as well.

<sup>2</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Order*”).

<sup>3</sup> 47 C.F.R. § 54.201(f) states, “[f]or the purposes of this section, the term ‘own facilities’

However, obtaining and maintaining UNEs is costly, and some state public utility commissions do not recognize UNEs as facilities. Therefore, Tele Circuit will avail itself of the FCC's conditional grant of forbearance and, by its attorney, hereby files its Compliance Plan outlining the measures it will take to implement the conditions of forbearance outlined in the *Order*.<sup>4</sup> Given the severe economic environment that is forcing many low-income customers to forego telecommunications service, Tele Circuit respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

## II. BACKGROUND

In the *Order*, the Commission granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>5</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

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includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term ‘facilities’ under this subpart.” The term “facilities” under Section 54.201 is defined as “any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part” (47 C.F.R. § 54.201(e)). The Company’s use of UNEs, including §251 loops, or equivalents thereof, commingled with § 271 elements, meets this definition of “facilities.”

<sup>4</sup> Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A), the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state (by obtaining UNEs, which are recognized as facilities under 47 C.F.R. § 54.201(f)), particularly for purposes of state universal service funding under state program rules and requirements. The Company will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

<sup>5</sup> See *Order* at ¶¶ 368, 373 and 379.

(2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

### **III. TELE CIRCUIT WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER**

Tele Circuit will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireline service to customers throughout the United States.

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

In the *Order*, the Commission requires Tele Circuit to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.<sup>6</sup> The Commission and consumers are hereby assured that all Tele Circuit 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 Tele Circuit phones as long as the phone remains connected, even if there are no minutes remaining on the account. Tele Circuit resells the network services of incumbent local exchange carriers ("ILEC") and the ILECs route 911 calls from the Company's customers in the same manner as 911 calls from their own customers. As a wireline carrier, the requirement to provide only E911-compliant handsets does not apply to Tele Circuit.

#### **B. Consumer Eligibility and Enrollment**

Tele Circuit will certify and verify consumer eligibility for Lifeline in accordance with

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<sup>6</sup> See *Order* at ¶ 373.

the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility, Tele Circuit will rely on the state identification or database.<sup>7</sup> In instances where Tele Circuit is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

### **1. One-Per-Household**

Tele Circuit understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as “any individual or group of individuals who are living together at the same address as one economic unit.”<sup>8</sup> Upon receiving an application for Lifeline support, Tele Circuit will check the duplicates database, once in place, to determine whether an individual at the applicant’s residential address is currently receiving Lifeline-supported service. Tele Circuit will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If Tele Circuit determines that an individual at the applicant’s address is currently receiving Lifeline-supported service, Tele Circuit will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, Tele Circuit will require applicants to complete and submit to the Company USAC’s one-per-household template, which will contain the following: (1) an explanation of the Commission’s one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant’s household and share in the

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<sup>7</sup> See *Order* at ¶ 98.

<sup>8</sup> See *Order* at ¶ 74.

household's expenses or benefit from the applicant's income; and (4) the penalty for a consumer's failure to make the required one-per-household certification (i.e., de-enrollment).<sup>9</sup> Tele Circuit will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

On its certification forms, a draft sample of which is attached,<sup>10</sup> Tele Circuit will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery address), unless they only have a temporary address, and a billing address for the service, if different (which may include a P.O. Box or General Delivery address).<sup>11</sup> Tele Circuit will inquire on its certification forms whether or not the applicant's address is a temporary one.<sup>12</sup> Tele Circuit will notify the consumer that if they have a temporary address, the Company may contact the consumer every 90 days, by phone or mail, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of Tele Circuit's attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program.<sup>13</sup> Also on its certification forms, Tele Circuit will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.<sup>14</sup> If the subscriber has moved, Tele Circuit will update the duplicates database, once in place, with the information within 10

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<sup>9</sup> See Order at ¶ 78.

<sup>10</sup> See Exhibit A. The draft form remains subject to change, but substantially reflects the content of the Company's application.

<sup>11</sup> See Order at ¶ 85.

<sup>12</sup> See Order at ¶ 89.

<sup>13</sup> See *id.* If and when the above requirement is approved, the Company will attempt to verify a temporary address and de-enroll from Lifeline any customer who fails to respond within 30 days to the Company's attempt. However, as of the date of filing of this Compliance Plan, the requirement to recertify every 90 days the addresses of beneficiaries living at temporary addresses has not been approved. In fact, on April 13, 2012, the Office of Management and Budget (OMB) invoked the Paperwork Reduction Act (PRA) to prevent the above-mentioned requirement from going into effect.

<sup>14</sup> See Order at ¶ 85.

business days of receipt of the information.<sup>15</sup>

As detailed below, Tele Circuit's certification form will clearly explain the one-per-household requirement and all consumers must certify that they receive Lifeline support for a single subscription per household.

## **2. Initial and Annual Certification**

Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company website, which will provide information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Tele Circuit's application form will identify that it is a "Lifeline" application. Tele Circuit will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, that interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services.

Tele Circuit's initial and annual certification forms will conform to the list of requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. Tele Circuit's Lifeline certification forms, a draft sample of which is attached as Exhibit A, will require each prospective subscriber to provide the following information:

- (i) The subscriber's full name;
- (ii) The subscriber's full residential address;
- (iii) Whether the subscriber's residential address is permanent or temporary;
- (iv) The subscriber's billing address, if different from the subscriber's residential address;
- (v) The subscriber's date of birth;
- (vi) The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
- (vii) If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
- (viii) If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in § 54.409, the number of individuals in his or her household.

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

The certification forms will also explain in clear, easily understandable language that:

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

Tele Circuit will require all consumers, at sign up and annually thereafter, to certify under penalty of perjury that:

- (i) The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;
- (ii) The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
- (iii) If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 54.400(e);
- (iv) If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
- (v) If the subscriber provided a temporary residential address, he or she will be required to verify his or her temporary residential address every 90 days;
- (vi) The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- (vii) The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
- (viii) The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
- (ix) The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

Applicants will also be required to initial a number of disclosure statements intended to

ensure that the applicant understands applicable eligibility requirements. 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, including Interactive Voice Response (IVR) recordings, that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.<sup>16</sup>

The Company may enroll Lifeline applicants in person at retail locations. When a prospective customer applies in person, Company employees or representatives (“personnel”) will ask to see a government issued ID and will validate the address via a USPS/Melissa Database. In cases where an eligibility database exists, Company personnel will contact the Company’s internal group dedicated to verifying eligibility who will query the database and either approve or deny the applicant. In states where eligibility databases are not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. Tele Circuit’s Lifeline application contains an “Office Use Only” section, which must be completely filled out and signed by Company personnel in order to record information about the specific documentation reviewed as part of the eligibility verification process. Eligibility documents are returned to the customer after review. Finally, Tele Circuit personnel will verbally explain the certifications to consumers before they initial the required disclosures and sign the application. Once the Lifeline application is complete, it is scanned into the Company’s database. Upon successful completion of the certification process, the customer is allowed to choose a service plan and Tele Circuit initiates provisioning of the phone line with the underlying carrier.

Tele Circuit anticipates to primarily enroll customers via the phone, whereby Company

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<sup>16</sup> See *Order* at ¶ 168.

personnel are able to verbally explain the Lifeline program and its eligibility requirements, including required information and disclosures, as well as collect and input electronically the application form information and obtain the applicant's signature via IVR. The Company then has the information needed to qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). Upon receipt of copies of the applicant's proof documentation, if applicable, and government-issued ID, Tele Circuit is able to complete the eligibility verification process, the customer is allowed to choose a service plan and Tele Circuit initiates provisioning of the phone line with the underlying carrier.

When enrolling via the Internet, prospective customers will be able to fill out an application form online and sign electronically. Tele Circuit will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.<sup>17</sup> The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). Upon receipt of copies of the applicant's proof documentation, if applicable, and government-issued ID, Tele Circuit is able to complete the eligibility verification process, the customer is allowed to choose a service plan and Tele Circuit initiates provisioning of the phone line with the underlying carrier.

Tele Circuit will determine eligibility utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a),(b)), as well as any additional state-specific criteria. Prior to enrolling a new subscriber, Tele Circuit will check the eligibility of low-income consumers first by accessing state or federal social services electronic eligibility databases, where available.<sup>18</sup> If a database is used to establish eligibility, Tele Circuit will not require documentation of the consumer's participation in a qualifying federal program; instead, Tele

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<sup>17</sup> See Order at ¶ 123.

<sup>18</sup> See Order at ¶ 97.

Circuit or its representative will note in its records what specific data was relied upon to confirm the consumer's initial eligibility for Lifeline.<sup>19</sup> However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for Tele Circuit to check electronic databases for eligibility, Tele Circuit will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.<sup>20</sup> Tele Circuit will require acceptable documentation both for income eligibility and for program eligibility. The Company will not retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility.<sup>21</sup> Tele Circuit understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Tele Circuit remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.<sup>22</sup>

Tele Circuit provides employees, agents, and representatives with training designed to give them an understanding of Lifeline program requirements and permit them to review customer documentation and determine whether it is sufficient to establish a customer's eligibility to participate in the Lifeline program under the Commission's rules. No Company employee, agent, or representative may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material. Among other things, the Lifeline program training discusses the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training explains what sections of the form must be completed by the

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<sup>19</sup> See *Order* at ¶ 98.

<sup>20</sup> See *Order* at ¶ 99.

<sup>21</sup> See *Order* at ¶ 101.

<sup>22</sup> See *Order* at ¶ 110.

customer and reviews the form disclosures in detail, to facilitate an employee's ability to explain each item contained therein and answer any customer questions.

### **3. Annual Re-Certification**

Tele Circuit understands that it must re-certify the eligibility of its entire Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013, and the Company may elect to perform this re-certification on a rolling basis throughout the year.<sup>23</sup> By December 31, 2012, Tele Circuit will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by email, or otherwise through the Internet—to confirm their continued eligibility.<sup>24</sup> The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. Tele Circuit will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section III.B.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Tele Circuit understands that such certifications may be obtained through a written format or an IVR system, and will use one or more of such options for its certifications.<sup>25</sup>

Alternatively, where a database containing consumer eligibility data is available, Tele Circuit (or state agency or third-party, where applicable) will instead query the database by the end of 2012 and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, Tele Circuit will contact the subscriber every year during the annual certification process to obtain a

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<sup>23</sup> *See Order* at ¶ 130.

<sup>24</sup> *See id.*

<sup>25</sup> *See Order* at ¶ 132.

valid address.<sup>26</sup> After 2012, Tele Circuit will continue to annually certify the continued eligibility of its entire subscriber base, either by accessing a qualifying database, or by electing to have USAC administer the self-certification process on the Company's behalf.<sup>27</sup>

Tele Circuit will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for reimbursement. As part of Tele Circuit's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

(1) that the Company has procedures in place to review consumers' documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state, and

(2) that the Company is in compliance with all federal Lifeline certification procedures.<sup>28</sup>

### **C. Other Reforms to Eliminate Waste, Fraud and Abuse**

Tele Circuit 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 Company customers from engaging in such abuse of the program, inadvertently or intentionally. The Company's service plans offer landline calling for a monthly fee, and thus do not invite instances of duplicative support or present the broader concerns regarding waste, fraud and abuse that arise from the "free" plans offered by many prepaid wireless providers. For this reason,

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<sup>26</sup> See Order at ¶ 131.

<sup>27</sup> See Order at ¶ 133.

<sup>28</sup> See Order at ¶ 126-27.

there is no need for the Company to implement a customer usage requirement.<sup>29</sup>

Tele Circuit has implemented enrollment procedures designed to prevent subsidies for duplicate or ineligible subscribers. The Company contracts with a third party Lifeline service bureau, currently CGM, LLC of Roswell, Georgia, to process and validate the Company's subsidy data to prevent Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month. Through the processes described herein, Tele Circuit ensures that it does not over-request from support funds.

As detailed in section III.B.2, Tele Circuit first validates each applicant's identity via a government issued ID card, passport, etc. Additionally, as mentioned above, Tele Circuit requires the applicant to provide their date of birth (DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor the Company representative can forge certification forms based on false names and addresses. Once the applicant's identity is confirmed, Tele Circuit verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, Tele Circuit checks any available eligibility database. If one is not available, the applicant is required to provide proof of eligibility. This prevents ineligible applicants from receiving the subsidy.

Tele Circuit verifies the address of the applicant first via the applicant's government issued ID, then validates the address via a USPS/Melissa Database to ensure the address is correct. This then prompts the representative to detail the one-per-household rule with the applicant. Tele Circuit's also dips the name/address combination into CGM's aggregate duplicate database to confirm that the applicant is not already receiving a Lifeline subsidy from Tele Circuit or any other CGM client.

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<sup>29</sup> The Company is not required to implement customer usage requirements. See *Order* at ¶ 257.

## **1. National Lifeline Accountability Database**

Tele Circuit will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Tele Circuit will provide to the database subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.<sup>30</sup> Tele Circuit will provide the information listed above for existing subscribers within 60 days of Commission notice that the database is capable of accepting subscriber information.<sup>31</sup>

Furthermore, on its certification form, Tele Circuit will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name, telephone number, and address will be divulged to USAC (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.<sup>32</sup>

Within 30 days following Commission notice that the database is capable of accepting queries, Tele Circuit will query the database to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from the Fund.<sup>33</sup>

## **2. Toll Limitation Service**

As a local exchange carrier, Tele Circuit distinguishes between toll and non-toll calls. Therefore, the Company offers toll limitation service (TLS) at no cost to its Lifeline customers in order to afford them the ability to manage the cost of their monthly service plans and avoid

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<sup>30</sup> See *Order* at ¶ 189.

<sup>31</sup> See *Order* at ¶ 190.

<sup>32</sup> See *Order*, Appendix C.

<sup>33</sup> See *Order* at ¶ 203.

higher expenditures that could prove to be devastating to a household of limited means. Tele Circuit provides unlimited minutes per month available for local calls only and a separate pool of minutes available for long distance calls (toll control). Customers may also opt out of the long distance minutes provided by Tele Circuit and either choose a different long distance provider, or request that the option for long distance calls be blocked altogether (toll block). Tele Circuit incurs a monthly fee for both toll block and toll control (the Company purchases resold TLS with periodic agreements sometimes purchased months in advance), and will thus seek reimbursement from the USF for TLS provided to eligible Lifeline subscribers. Tele Circuit understands that TLS support is currently limited to \$3.00 per month per TLS subscriber, and will be reduced to \$2.00 in 2013 and eliminated at the beginning of 2014.<sup>34</sup>

### **3. Marketing & Outreach**

Tele Circuit will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Tele Circuit will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:<sup>35</sup> (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. Tele Circuit's website and printed collateral will explain the documentation necessary for enrollment, and the details of Tele Circuit's plans.

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<sup>34</sup> See *Order* at ¶ 234.

<sup>35</sup> See Exhibit B for a sample advertisement. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. See *Order* at ¶ 275.

Such collateral and website information, as well as its application, will make clear that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.<sup>36</sup> For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Tele Circuit will include the URL link for its website where disclosures will be listed. Additionally, Tele Circuit will disclose the company name under which it does business.<sup>37</sup>

#### **4. Audits**

The *Order* requires ETCs that draw \$5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, to hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess the ETC's overall compliance with the program's requirements.<sup>38</sup> Tele Circuit will comply with this requirement if and when it is approved, including applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.<sup>39</sup>

#### **D. De-Enrollment**

Tele Circuit will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

Ineligibility. Any subscriber who indicates that he or she is receiving more than one

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<sup>36</sup> See *Order* at ¶ 275.

<sup>37</sup> See *id.*

<sup>38</sup> See *Order* at ¶ 291.

<sup>39</sup> See *Order* at ¶ 294. As of the date of filing of this Compliance Plan, the audit requirement has not been approved. In fact, on April 13, 2012, the OMB invoked the PRA to prevent the above-mentioned requirement from going into effect.

Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).<sup>40</sup>

If a customer does not respond to the Company's annual verification survey within 30 days, or if Tele Circuit has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Tele Circuit will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.<sup>41</sup> Similarly, Tele Circuit will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.<sup>42</sup>

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,<sup>43</sup> Tele Circuit will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

## **E. Additional Rule Amendments**

### **1. Terms and Conditions of Service**

The Company's Lifeline offering is summarized in section IV.C below. The Company's terms and conditions are subject to change as needed. Tele Circuit maintains current tariffs, which are public record, with the public service commissions in the states in which it operates, and also makes its tariffs available to customers at their request.

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<sup>40</sup> See Order at ¶ 122.

<sup>41</sup> See *id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

<sup>42</sup> See Order at ¶ 89.

<sup>43</sup> See Order at ¶ 214-16.

## **2. Reporting Requirements**

Tele Circuit will report all information required by section 54.422, including as it may heretofore be amended. This includes the names of the Company's holding company, operating companies and affiliates, and any branding ("doing-business-as company" or brand designation), and provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline plans for voice telephony service offered specifically for low income consumers through the program offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>44</sup>

## **3. Reimbursement from USAC**

In seeking reimbursement for Lifeline, Tele Circuit will comply with the requirements of C.F.R § 54.407, as revised by the *Order*.<sup>45</sup> Tele Circuit will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,<sup>46</sup> and the Company will seek reimbursement for actual lines served, not projected lines.<sup>47</sup>

## **4. Section 54.202 Certifications**

Tele Circuit certifies the following in accordance with newly amended C.F.R. § 54.202: (1) Tele Circuit will comply with the service requirements applicable to the support that it receives; (2) Tele Circuit is able to remain functional in emergency situations; (3) Tele Circuit will satisfy applicable consumer protection and service quality standards.

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<sup>44</sup> See *Order* at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person.

<sup>45</sup> See *Order* page 221.

<sup>46</sup> See *Order* at ¶ 128.

<sup>47</sup> See *Order* at ¶ 302.

#### **IV. COMPANY INFORMATION**

Tele Circuit is a Georgia corporation. Tele Circuit will provide prepaid wireline telecommunications services to consumers by using the networks of underlying carriers such as AT&T, Verizon, and Qwest/CenturyLink.

##### **A. Names and Identifiers**

Tele Circuit does not have a holding company, operating company, or any affiliates, and operates under and identifies itself as Tele Circuit Network Corporation.

##### **B. Financial and Technical Capability**

Tele Circuit is financially and technically capable of providing Lifeline-supported services.<sup>48</sup> Tele Circuit has been providing telecommunications services for five years and provides service to both Lifeline and non-Lifeline customers. Tele Circuit currently provides wireline services in Alabama, Arizona, Colorado, Florida, Georgia, Illinois, New York, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, North Carolina, Oklahoma, Texas, Utah, Virginia, and Wisconsin. Tele Circuit has not been subject to enforcement action or ETC revocation proceedings in any state. Tele Circuit is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. The Company will continue to rely on its successful business model and service offerings to sustain and grow its business, independent of USF disbursements that provide discounts for qualifying Lifeline subscribers. Furthermore, the senior management of Tele Circuit has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.<sup>49</sup> Tele Circuit will be providing resold wireline service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier(s).

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<sup>48</sup> See Order at ¶ 387.

<sup>49</sup> See Exhibit C for key management resumes.

### **C. Lifeline Offering**

Tele Circuit will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier(s). Tele Circuit currently offers its Lifeline service in Alabama and Florida. The Company's Lifeline offering will provide customers with a discount on their monthly phone service package equal to the current maximum federal (and state, where applicable) Lifeline subsidy. Exhibit D attached hereto reflects the Company's rate plans in Florida based on the current maximum subsidy amount of \$13.50. Rates may vary by state depending on ILEC territory.

V. **CONCLUSION**

Tele Circuit submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. 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 the Company's Lifeline services. Accordingly, Tele Circuit respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Tele Circuit Network Corporation

/s/ Lance J.M. Steinhart

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Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse  
Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200

*Its Counsel*

Dated May 4, 2012

**Exhibit A**

Sample Lifeline Certification Form

# TELECIRCUIT NETWORK CORPORATION LIFELINE APPLICATION (GA)

WIRELINE

- LIFELINE IS A FEDERAL BENEFIT
- BY LAW, LIFELINE IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, EITHER LAND LINE OR WIRELESS; A HOUSEHOLD CANNOT RECEIVE BENEFITS FROM MULTIPLE PROVIDERS
- A HOUSEHOLD IS DEFINED, FOR PURPOSES OF THE LIFELINE PROGRAM, AS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES

I hereby certify that I participate in a minimum of one of the following programs:

Food Stamps     Federal Public Housing Assistance (FPHA)     Medicaid     Supplemental Security Income (SSI)  
 Temporary Assistance to Needy Families (TANF)     Low Income Home Energy Assistance Program (LIHEAP)  
 National School Lunch Program (free)     Senior Citizen low-income discount plan offered by the local gas or power company

I hereby certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG).

There are \_\_\_\_\_ individuals in my household.

Last Name: \_\_\_\_\_ First Name: \_\_\_\_\_ MI \_\_\_\_\_

Residence Street/Apt No. (NO P.O. Box) \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

This address is     Permanent     Temporary     Multi-Household

Billing Street/Apt No. \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Contact Phone Number: \_\_\_\_\_ Last 4 Digits of SSN#: \_\_\_\_\_ Birth Date: \_\_\_\_\_

### PENALTY OF PERJURY

Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

### I certify under penalty of perjury that:

I understand that Lifeline assistance is available for only one residential wired phone line per household or one wireless phone per household (i.e. not both). I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government.

To the best of my knowledge, neither I nor anyone in my household currently receives landline or wireless Lifeline service.

I will notify Tele Circuit within thirty (30) days if I no longer qualify for Lifeline.

I will notify Tele Circuit within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Tele Circuit every ninety (90) days. If I fail to respond to Tele Circuit's address verification attempts within thirty (30) days, my Tele Circuit Lifeline service may be terminated.

I understand that Tele Circuit will contact me each year to re-certify my continued eligibility for Lifeline. If I fail to re-certify my eligibility within thirty (30) days, it will result in the termination of my Tele Circuit Lifeline service.

I understand that it is a violation of federal and state law to rent, sell, or give away Tele Circuit Lifeline Service and that I certify that I will only use this phone for my household's own use and will not resell it. I understand Lifeline service is non-transferrable.

I authorize Tele Circuit or its duly appointed representative(s) to: 1) access any records contained in any governmental or commercial database to verify my statements herein to; 2) confirm eligibility and/or continued eligibility for Lifeline assistance; 3) to validate, confirm or update my address; and 4) authorize social service agency representatives to discuss with and/or provide information to Tele Circuit verifying my participation in benefit programs or income levels that qualify me for Lifeline assistance. I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy.

\_\_\_\_ CHECK HERE THAT YOU HAVE READ AND AGREE TO ALL OF THE STATEMENTS ABOVE. Signing below, I acknowledge that the information contained on this form is true and correct the best of my knowledge and belief and providing false or fraudulent documentation in order to receive government assistance is punishable by law.

\_\_\_\_\_  
APPLICANT'S SIGNATURE

\_\_\_\_\_  
DATE

FOR OFFICE USE ONLY:	
Company Representative: _____	Documentation Verified: _____
Signature: _____	Date: _____

**Exhibit B**

Sample Advertisement

**Revised 04/04/12 Georgia Specific  
Visual**

**Graphic:**

Do you receive Government Assistance?

Affordable Home Phone Service  
1st Month FREE

**Roll the graphic:**

Food Stamps  
Housing Assistance  
Medicaid  
Supplemental Security Income  
Low Income Home Energy Assistance Program  
Temporary Assistance for Needy Families  
Senior citizen low-income discount plan offered by  
local gas or power company

You may also qualify based on income

**Graphic:**

First Month Free  
Caller ID  
Call Waiting  
FREE Long Distance minutes

No Deposit  
No Credit Check  
(call for details - local AT&T service areas only)

**Graphic:**

\$19.95 per month  
(plus taxes and fees after discount)

**Graphic continuously at  
the bottom of the screen**

1-800-738-0057  
[www.onemonthfreephone.com](http://www.onemonthfreephone.com)

Lifeline is a government-supported service available only to eligible consumers. Documentation required for proof of benefits. Only one benefit per family/household. Customers willfully making false statements concerning benefits can be punished by fine or imprisonment or can be barred from the program. Terms and conditions apply. Talk to a customer service representative for more information or visit [www.onemonthfreephone.com](http://www.onemonthfreephone.com)

Complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 1-800-282-5813

**Audio**

Are you currently receiving any type of government assistance?

If so, you may qualify for discounted home telephone service for only \$19.95 per month.

Call today and your first month is FREE, including Caller ID and Call Waiting plus free long distance minutes each month. There is no credit check and no deposit.

Call today at 1-800-738-0057 to receive your first month of home phone service FREE.

CALL 1-800-738-0057 or go to [onemonthfreephone.com](http://onemonthfreephone.com).

## **Exhibit C**

### Key Management Resumes

# Thomas E. Allen

1901 S. Palmetto Ave  
South Daytona, FL 32119  
386-212-0212  
tommy@telecircuit.com

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**Education** Lanier High School Macon, GA - Graduated 1970  
Mercer University, Macon, GA - Graduated 1974  
Bachelor of Arts Degree  
Major: Business Administration

## Experience

### **Chief Operations Officer, September 2008 - Present Tele Circuit Network Corp Alpharetta, GA**

In concert with the CEO, work to establish an annual operations execution plan and to maintain "best practices and processes" in the office.

In concert with the CEO, work to effectively managing their assigned human resources, included but not limited to recruitment, hiring, training, performance reviews/rewards, progressive discipline issues and compensation plans.

Work with CEO to establish and coordinate arrangements for regular regional meetings including preparation of meeting agenda and materials.

Promoting growth and goodwill for the company through daily personal contact with agents and other outside individuals and organizations, and through attendance staff meetings, community meetings, and trade associations.

Carrying out supervisory responsibilities in accordance with the organization's policies and applicable laws.

Performing interviewing and training of employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

### **President, 1991 - 2007 Deland Actel, Inc Daytona Beach, FL**

I recruited, trained and managed the sales and marketing team selling telecommunication services and equipment directly to businesses and individuals. As of August 1999 upon receiving CLEC certification, operated a prepaid Competitive Local Exchange Carrier with service offered in GA and FL with as many as 5000 customers. Was responsible for technical implementation of telecommunications services as well as regulatory and tariff issues with each state public utilities commission. Managed customer service departments that regularly dealt with customer service issues. Regularly reviewed expense and reimbursement reports, budgets and reviewed financial statements and reports.

**Vice President, 1978 - 1991**  
**Actel Communications Macon, GA**

As an Authorized Service Representative for BellSouth Telecommunications, I recruited, trained and managed the sales and marketing team selling telecommunication services and equipment directly to businesses and individuals. Developed training manuals and technical instructions to use by the sales people. Instituted account management systems and trained on sales techniques. Developed sales forecasts along with service and pricing plans.

# Susan R. Mulhall

1568 N. Woodland Blvd.  
Deland, FL 32720  
386-734-0057  
susan@telecircuit.com

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**Education** Briarcliff High School, Briarcliff Manor NY

**Experience** 1995-2000 Actel Deland Actel, Inc. Deland, FL  
**Bookkeeper-Office Manager**  
Cellular Service & Equipment retail sales  
Trained and Managed sales staff  
Full Charge Bookkeeper  
Sales and Communication tax reporting and remittances  
Responsible for provisioning in Bellsouth system

2000 - 2007 Actel Wireless, Inc Deland, FL

**President - General Manager**

I recruited, trained and managed the sales and marketing team selling telecommunication services and equipment directly to businesses and individuals. Upon receiving CLEC certification, operated a prepaid Competitive Local Exchange Carrier with service offered in FL.

Was responsible for technical implementation of telecommunications services as well as regulatory and tariff issues with each state public utilities commission. Managed customer service departments that regularly dealt with customer service issues. Regularly reviewed expense and reimbursement reports, budgets and reviewed financial statements and reports.

Responsible for all provisioning in Sprint system.

Report and follow up on repair issues.

Sales & Communication Tax reporting and remittance.

Cellular Service & Equipment retail sales

2007-Present Tele Circuit Network, Inc Alpharetta, GA

**Provisioning Manager**

Responsible for Provisioning in Bell South, Embarq, Verizon and Windstream systems.

Report and follow up on repair issues.

Resolve errors on provisioning orders

Assist customer service as needed

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**Career Objective**

A challenging position in customer services and provisioning

**Education**

**Bachelor of Arts, Political Science**, June 1999  
University of Georgia, Athens, Georgia  
**Advance diploma in Computer Sciences**, July 2000

**Professional Experiences**

**Customer Services**, Nov 2001-September 20,2002  
**Kroger, USA Alpharetta, G,A, 30022**

**Responsibilities**

- Creating and configure customers databases and history using application software. Maintaining and create inner-circle and business files as well working on member's resale And exempt files
- Enter data and build inventory skew numbers on system, also work on merchandise Pickups
- Working on tails to handle cash, deposits, even exchange and refunds staff. Maintain Ledger for monthly range of profits and loss
- Performed cashier function for Treasury Department, handling and maintaining records daily cash on hand. Performed General ledger entry to appropriate accounts.
- Stop-payment and wire transfers,

**Membership Services/ Customer Services** Jan2002-September 20,2002  
**BJ'S wholesale Club, USA, Cummings, G,A,**

**Responsibilities**

- Acquired comprehensive product line Knowledge and ability to quickly assess customer needs and develop full services product and service offerings
- Sought new business by calling on potential customers and sending them mass mailings
- Maintained client information system by creating, updating and deleting client's database
- Managed and organized material for various training sessions including materials for trainers
- Prepared and organized office files, documents invoices and kept track of schedule of events

**Administrative Assistant**, July 1999-Oct 2001

**Citibank, Atlanta, Georgia**

- Responsible for managing, analyzing, authorizing personal loans, auto loans and credit cards.
- Trained temporary staff and new hire replacements in journal entry, meeting standards for timeliness and accuracy and integrating new employees into the unit and train The sales executives
- Interviewed for possible appointments of executives and customer service representatives Managing staff appointments and terminations
- Authorized personal loans, auto loans and credit cards for members
- Sought new business by calling on potential customers and sending them mass mailings
- Arranged meeting between clients and sales executives
- Offered various deals for potential clients

**Technical Skills**

Software Installation, Application Software for account management, Application Management, and Data Entry Techniques

**Operating Systems:** MS Windows {95/98/2000} Dos and {NT, Novell} Database

**Software Installation:** Data Entry Techniques, and Computer Assembling

**Web Tools:** Netscape Communicator, Internet explorer, HTML

**Office Tools:** MS Offices, MS Power point, MS outlook Express, MS FoxPro

## Ashar Syed

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### Summary of Expertise

A software developer with over 9 years of product development, business development, marketing management and software consulting experience. Solid reputation as a strategic visionary, and problem solver. Strong ability to develop and motivate teams. Performance-oriented with experience in profit and loss management. Skilled in executive level presentations, vendor relationships, and strategic partnerships. Extensive technical expertise in telecommunication software development, data communication technologies, and Internet applications.

### Professional Experience

**Chairman and CEO, October 2003 - Present**

**Tele Circuit Network Corp. Alpharetta, GA**

Created a long-distance telecommunication company that has been in operation for one and half year. Consultant to several telecommunication, software development and professional services companies on content and product support strategies, vertical market development, business partnership deal structures and customer acquisition. Conceived, developed and brought telecom services to market such as calling card, T1s, DSL and long-distance. Designed user interfaces and telephony applications. Delivered technology assessments and evaluations for training, knowledge ware and groupware applications. Negotiated licensing and joint venture agreements. Established pricing policies. Designed and executed advertising, direct mail and telemarketing campaigns for Tele Circuit.

**Technical Manager, July 1999 – September 2003**

**America's Tele-Network Corp. Roswell, GA**

Responsible for managing, analyzing, designing, implementation, testing and maintaining of **GUIs, Telephony, Internet, Intranet, Extranet and Database Systems** related to telecommunications industry. **Provide application modeling and programming expertise in building software and hardware solutions for maintenance and management of Voice Processing, Customer Service and Billing systems using C++, MFC, Dialogic SDK, Green Leaf, Visual Voice, COM, ActiveX Controls, SQL Sever, MS Access.**

- Providing technical skills of strategic network planning for data transfer between different offices at other locations.
- Supervised and developed file processing and on-line communication system with different long distance carriers like, AT&T, QWest, Sprint, and MCI-WorldCom.
- Analyzed, designed, implemented and maintaining **Automated Telephone Dialer System** using **Object-Oriented** methodologies, which is being used as the main sales, marketing and advertising tool. Automatically dial customers from lead pool, record voices, process them and response to the customers questions analytically. This **Multithreaded System** is operated on a **Digital Dialogic Card** and implemented using **MFC, C++, Visual Voice, Dialogic SDK, MS Access and SQL Server.**
- Analyzed and designed **Client-Server Architecture** for customer services named QuickLink. This **Two-Tier** application is being by all customer service representatives to process customer complaints and requests. The presentation tier was modeled using **UML** and its architecture is based on **COM Components** and Object-Oriented technology. It was implemented using **C++, ASP, MFC, JavaScript, DLLs, ActiveX**

## **Education**

**Master of Telecommunications Management**, December 2002  
Keller Graduate Institute of Technology, Alpharetta, Georgia

**Master of Science, Computer Science**, April 1998  
University of South Alabama, Mobile, Alabama

**Master of Science, Computer Science**, September 1995  
Quaid-e-Azam University, Islamabad, Pakistan

**Certified Internet Web Associate**, June 2000



References available on request

**Exhibit D**

Proposed Lifeline Rate Plans

## Monthly Recurring Charges - Lifeline

**1. Basic Service**

Monthly Service Charge

AT&T service area	\$19.95
Windstream service area	\$26.45

**2. Enhanced Service**

Includes 2 optional features

Monthly Service Charge

AT&T service area	\$24.95
Windstream service area	\$36.45

**3. Enhanced Plus Service**

Includes 5 optional features

Monthly Service Charge

AT&T service area	\$29.95
Windstream service area	\$46.45