

**VIA ECFS**

June 1, 2012

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

**Re: WC Dockets 09-197 and 11-42  
Compliance Plan of Nexus Communications, Inc.**

Dear Secretary Dortch:

Pursuant to the Commission's *Lifeline Reform Order* and Public Notice, attached please find the Second Amended Compliance Plan of True Wireless, LLC ("True Wireless").<sup>1</sup>

True Wireless respectfully requests expedited approval of its Compliance Plan as it intends to participate in the Commission's broadband pilot program described in the *Lifeline Reform Order*.

Respectfully submitted,



Danielle Frappier

---

<sup>1</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012); *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, DA 12-314 (WCB rel. Feb. 29, 2012).

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

In the Matter of

Lifeline and Link Up Reform and  
Modernization

Telecommunications Carriers Eligible to  
Receive Universal Service Support

True Wireless, LLC Petition for Designation as  
an Eligible Telecommunications Carrier for  
Low Income Support Only

WC Docket No. 11-42

WC Docket No. 09-197

**SECOND AMENDED COMPLIANCE PLAN OF TRUE WIRELESS, LLC**

True Wireless, LLC (“True Wireless”) through its undersigned counsel, hereby seeks to avail itself of the Federal Communications Commission’s (“Commission”) grant of forbearance from the “own facilities” requirement set forth in 47 U.S.C. § 214(e)(1)(A) by submission of this Compliance Plan. True Wireless’ Compliance Plan is filed in accordance with the procedures established in the *Lifeline Reform Order*<sup>1</sup> and clarified the *Public Notice* issued by the Wireline Competition Bureau on February 29, 2012.<sup>2</sup> True Wireless is submitting simultaneously with this Compliance Plan an Amendment<sup>3</sup> to its pending Petition for designation as an eligible

---

<sup>1</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (FCC rel. Feb. 6, 2012) (“*Lifeline Reform Order*”).

<sup>2</sup> *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, DA 12-314 (WCB rel. Feb. 29, 2012) (“*Public Notice*”).

<sup>3</sup> *True Wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, Second Amendment to Petition, WC Docket No. 09-197 (filed May 25, 2012).

telecommunications carrier (“ETC”) in states that have declined jurisdiction over wireless carriers.<sup>4</sup>

True Wireless respectfully requests expeditious approval of its Petition and its Compliance Plan so that the Company may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC and may provide service to additional eligible low income consumers in the various states for which it has pending ETC petitions.

As set forth below, True Wireless will fully comply with all conditions set forth in the Commission’s recently amended Lifeline rules and with all pertinent conditions set forth in the Lifeline Reform Order. This Compliance Plan describes the measures True Wireless already has implemented or intends to implement in order to achieve full compliance with the Commission’s Lifeline rules and policies. For the convenience of the Commission, this Compliance Plan follows the format established by the Wireline Competition Bureau in the *Public Notice*.

## **I. INFORMATION ABOUT TRUE WIRELESS AND THE LIFELINE PLANS IT OFFERS**

### **A. Company Information**

True Wireless, LLC (“True Wireless”) is a Texas limited liability company, with headquarters in Bartlett, Tennessee. True Wireless’ 100%, direct parent is True Wireless Acquisition Group, LLC, which is, in turn, 100% directly owned by Kevin Brian Cox, who more commonly goes by the name of Brian Cox. True Wireless Acquisition Group, LLC provides no services and serves only as a holding company. True Wireless has no subsidiaries and operates

---

<sup>4</sup> *True Wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, Petition, WC Docket No. 09-197 (filed Dec. 22, 2011).

under the name “True Wireless.”<sup>5</sup> True Wireless has no affiliates that participate in the Lifeline or any other federal universal service program. Mr. Cox owns a non-controlling interest in 321 Communications, Inc., a CLEC and interexchange services provider. Mr. Cox also owns a majority interest in Prepaidworx, LLC, which is not a telecommunications carrier but rather, facilitates consumer payments for prepaid services (including True Wireless’ service) on-site at third-party retailers through its physical payment terminals and web-based application. Finally, Mr. Cox owns 100% of Contigo Wireless LLC, which intends to offer international-only calling cards but has not yet begun to provide service.<sup>6</sup>

### **B. True Wireless’ Financial and Technical Capabilities to Provide Lifeline Service**

True Wireless has been providing service since mid-2010 and focuses on providing service to low income consumers. To date, the company has been designated as an ETC in five states: Arkansas, Maryland, Oklahoma, Rhode Island and Texas. True Wireless also has ETC petitions pending with regulatory commissions in eight states,<sup>7</sup> and an ETC petition pending with the Commission for nine states.<sup>8</sup> True Wireless does not seek, and will not accept, High Cost support in any of those states, or in the states in which it currently provides service.

---

<sup>5</sup> True Wireless has registered the following additional d/b/a names in Texas: “Government Wireless Benefits,” “Total Communication Services” and “USA Government Phones.” It has not yet used these names to market its services (other than utilizing the URL [www.usagovphone.com](http://www.usagovphone.com), which simply redirects users to True Wireless’ online form), but may do so in the near future.

<sup>6</sup> Mr. Cox owns other businesses that have no relationship to the telecommunications industry, and in any event, all separately-formed legal entities maintain separate books and finances.

<sup>7</sup> Those states include Georgia, Idaho, Louisiana, Missouri, West Virginia, Wisconsin and Wyoming. True Wireless is in the process of withdrawing (without prejudice) its petitions in Kansas, Kentucky and New Jersey. Its petition in Mississippi has been retired without prejudice. Those states have indicated a preference for ETCs to refile their petitions subsequent to Commission approval of their compliance plans.

<sup>8</sup> The states included in True Wireless’ petition filed with this Commission are: Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia. In the Amendment being filed simultaneously with this Compliance Plan, True Wireless also is requesting authority to serve the District of Columbia.

True Wireless is successfully providing Lifeline supported services in the various states where it has received ETC designation and has a steadily increasing customer base. True Wireless owns and operates its own switching facilities, back-office and operations support systems (“OSS”) that are ideally suited to serve lower revenue subscribers. True Wireless has invested millions of dollars to evaluate, design, develop and integrate these systems.

True Wireless is financially stable and fully capable of honoring its service obligations to customers, as well as federal and state regulatory obligations. Although True Wireless derives the majority of its revenue from the sale of prepaid wireless services, True Wireless does not rely exclusively on USF disbursements to operate. For example, True Wireless derives additional revenue from the sale of wireless services with respect to certain of its wireless plans that are not fully covered by the Lifeline subsidy, the sale of wireless services to non-Lifeline customers, the sale of replenishment airtime minutes, and the sale of optional service packages (*e.g.*, Internet/text services).

Finally, True Wireless has not been subject to any enforcement action or ETC revocation proceeding in any state.

### **C. Geographic Area of True Wireless’ Service Offerings**

True Wireless first began providing prepaid wireless ETC service in 2010 and the company now provides this service in the following states: Arkansas, Maryland, Oklahoma, Rhode Island and Texas. The company is poised to rapidly expand of its operations once its pending ETC applications are approved by the Commission and various state regulatory commissions.

#### **D. True Wireless' Lifeline Service Plans**

In Arkansas, Maryland, Rhode Island and Texas, True Wireless will offer the following prepaid wireless service plan under the Lifeline program: 90 minutes of nationwide calling for a monthly charge of \$9.25 for non-Lifeline subscribers, and no monthly charge for Lifeline subscribers after application of the standard \$9.25 discount.<sup>9</sup> The service includes a 911-compliant handset and the following at no additional charge: voicemail, call waiting, caller ID, balance inquiries and calls to emergency 911 services. Unused minutes do not carry over to the following month. Subscribers may purchase additional blocks of minutes in 100, 250 or 400 minute increments for \$10, \$20 and \$30 respectively. Text messages will be valued at one talk minute per message sent and/or received. Subscribers who use the service outside of True Wireless' service area incur a roaming charge of \$0.59 per minute.<sup>10</sup> The rate for directory assistance calls is \$2 per request. True Wireless blocks international calls for its Lifeline subscribers at no additional charge.

In Oklahoma, True Wireless offers two plans for Lifeline customers in its service territory, which is almost entirely Tribal in nature. The first plan includes an unlimited number of minutes for a monthly fee of \$6.75 after application of the standard \$34.25 Tribal Lifeline discount. The second plan includes 1,000 minutes per month and a monthly fee of \$1.00 after

---

<sup>9</sup> True Wireless will be updating its terms and conditions and tariffs to reflect this new pricing and the new standard \$9.25 discount in all non-Tribal areas of all states. True Wireless will also simplify its offerings to one plan (i.e., the 90-minute plan described above) given that the vast majority of its subscribers choose this plan.

<sup>10</sup> Roaming charges are very rarely incurred by True Wireless' Lifeline subscribers because it is True Wireless' policy to prevent or reduce to a minimum the number of instances where its subscribers are provided service through roaming arrangements. Specifically, True Wireless has two underlying carriers to choose from and puts its subscribers on the network that is better suited to avoid roaming charges to the extent possible. Because True Wireless' services are prepaid, customers do not incur out-of-pocket costs in the rare instances where roaming charges would apply. Instead, True Wireless deducts roaming minutes at a higher rate than non-roaming minutes, generally on a twelve to one ratio.

application of the standard \$34.25 discount. All other terms and conditions are identical to those of the 90-minute plan described above.

Upon its designation as an ETC by the Commission, True Wireless will offer a Lifeline service plan that includes 250 minutes of nationwide calling per month as no charge to the subscriber after application of the \$9.25 Lifeline discount in the following states: Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia. All other terms and conditions are identical to the 90-minute plan described above except that text messaging will not be available with this plan. True Wireless will also offer its 90-minute plan in these states.

#### **E. Other Certifications Required by 47 C.F.R. § 54.202**

The *Public Notice* requires carriers to include certifications required under newly amended 47 C.F.R. § 54.202. True Wireless hereby certifies that it will comply with the service requirements applicable to the support it receives.<sup>11</sup> Specifically, True Wireless' Lifeline services: (i) include voice telephony services that provide voice grade access to the public switched network or its functional equivalent; (ii) provide subscribers with a defined number of minutes of usage for local service at no additional charges (as described above in Section I(D)); (iii) provide subscribers with access to the emergency services provided by local government or other public safety organizations, such as 911/E911, to the extent the local government in True Wireless' service area has implemented 911/E911 systems (as described below in Section III); and (iv) toll limitation for qualifying low-income consumers.<sup>12</sup>

---

<sup>11</sup> 47 C.F.R. § 54.202(a)(1).

<sup>12</sup> Toll limitation means both toll blocking and toll control, or, if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control. True Wireless commits to meeting this requirement by offering service on a prepaid, or pay-as-you-go, basis. As the Commission found in its grant of ETC designation to Virgin Mobile, "the prepaid nature of [a prepaid wireless carrier's] service offering works as an effective toll control." *Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, 24 FCC Rcd 3381, 3394 at ¶ 34 (2009). Moreover, True Wireless' calling plans do not distinguish between local or toll services, and offer

## **II. TRUE WIRELESS' PLANS FOR COMPLIANCE WITH NEW COMMISSION RULES RELATING TO DETERMINATIONS OF SUBSCRIBER ELIGIBILITY FOR LIFELINE SERVICES**

True Wireless will comply with the requirements pertaining to consumer qualifications for Lifeline set forth in new section 54.409 of the Commission's rules<sup>13</sup> upon its effective date and any state-specific requirements in the various states in which True Wireless has been (or will be) designated an ETC. More specifically, True Wireless will require all subscribers to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new 47 C.F.R. § 54.409(a)(2) or 47 C.F.R. § 54.409(a)(3). True Wireless also will confirm that the subscriber is not already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service.<sup>14</sup>

True Wireless uses several forms of marketing for its Lifeline supported services, which include direct mail, Internet advertising, television and radio advertisements, and live events conducted by third party representatives. These marketing channels are intended to induce potential subscribers to contact True Wireless either in person (at live events), over the Internet or by telephone. Although the logistics of the enrollment process varies somewhat for each marketing channel as is further described below, in all cases, Lifeline applicants are thoroughly screened to ensure that they are qualified before a handset is delivered.

### **A. True Wireless' Procedures to Determine Consumer Eligibility for the Lifeline Program**

If True Wireless cannot determine an applicant's eligibility for Lifeline by accessing income or program eligibility databases, True Wireless personnel (employees, third party

---

nationwide calling. True Wireless will provide this toll control to qualifying low income consumers at no additional charge.

<sup>13</sup> 47 C.F.R. § 54.509.

<sup>14</sup> 47 C.F.R. § 54.409(c).

customer service representatives, or third party representatives at live events) will review documents to establish eligibility in accordance with the criteria set forth in 47 C.F.R. § 54.409. All True Wireless personnel who interact with existing Lifeline customers or Lifeline applicants will be fully trained on the Commission's revised Lifeline eligibility rules and True Wireless' practices and policies designed to implement these new rules.

True Wireless will follow the Commission's requirements pertaining to acceptable documentation to establish eligibility based either on income level or participation in a qualified government assistance program, unless otherwise established by a state Lifeline administrator or other state agency. Specifically, acceptable documentation of program eligibility will include: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program ("SNAP") electronic benefit transfer card or Medicaid participation card (or copy thereof); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.<sup>15</sup> Acceptable documentation of income eligibility will include: (1) the prior year's state, federal, or Tribal tax return; (2) current income statement from an employer or paycheck stub; (3) a Social Security statement of benefits; (4) a Veterans Administration statement of benefits; (5) a retirement/pension statement of benefits; (6) an Unemployment/Workers' Compensation statement of benefit; (7) federal or Tribal notice letter of participation in General Assistance; (8) or a divorce decree, child support award, or other official document containing income information. If the prospective subscriber presents True Wireless with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months

---

<sup>15</sup> *Lifeline Reform Order* at ¶ 101.

within the previous twelve months.<sup>16</sup> True Wireless personnel will examine and record the type of documentation presented by each prospective Lifeline subscriber, but will not retain copies of these documents.<sup>17</sup> If an applicant is unable to provide documentary proof of eligibility based on either household income level or current participation in a qualified program, True Wireless will deny that application.

### **B. True Wireless' Procedures for Subscriber Certifications**

In the *Lifeline Reform Order*, the Commission established a path for a transition to a national database that will be used to confirm the initial and continued eligibility of a Lifeline customer.<sup>18</sup> True Wireless will utilize that database when it becomes operational. Until that time, however, True Wireless will continue to use any relevant state databases where available, and will otherwise adhere to the following procedures for enrolling prospective customers into the Lifeline program.

True Wireless will implement certification procedures that will enable prospective customers to demonstrate their eligibility by contacting True Wireless either in person or by telephone, facsimile or over the Internet. Except in states in which applicants are enrolled through a designated state agency, True Wireless will have direct contact with all prospective customers applying for Lifeline service, either in person through its employees or third party representatives at live events, or by telephone, facsimile or over the Internet. At live events, True Wireless representatives will examine the qualifying documentation in person or, if the applicant does not have the documentation at the time, direct the applicant to supply the documentation via fax or electronic delivery. Prospective customers who do not complete True Wireless' Lifeline Application in person must return the signed document and eligibility

---

<sup>16</sup> 47 C.F.R. § 54.410(b)(1)(i)(B).

<sup>17</sup> 47 C.F.R. § 54.410(b)(1)(ii) - (iii); 47 C.F.R. § 54.410(c)(1)(ii)-(iii).

<sup>18</sup> See *Lifeline Reform Order* at ¶ 403.

documentation to True Wireless by mail, facsimile, electronic mail or other electronic transmission. True Wireless will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006 and any applicable state laws, and is submitting as Exhibit 3 a script for oral certifications in which it has drafted consumer-friendly language that captures all information required by the Commission's new certification requirements.<sup>19</sup>

Every prospective subscriber in a non-database state will be required to complete True Wireless' revised "Lifeline Application," once the new rules become effective. True Wireless' revised Lifeline Applications for the states in which it currently operates is attached hereto at Exhibit 1. These revised Lifeline Applications conforms to the requirements of the *Lifeline Reform Order*, 47 C.F.R. § 54.410(d) and 47 C.F.R. § 54.405.

True Wireless will collect the following information from prospective subscriber in its Lifeline Application forms: (1) the subscriber's full name; (2) the subscriber's full residential address (P.O. Boxes are not permitted); (3) whether the residential address is permanent or temporary; (4) the subscriber's billing address, if different; (5) the subscriber's date of birth; (6) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number<sup>20</sup>); (7) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (8) if the subscriber is seeking to qualify for Lifeline under

---

<sup>19</sup> See *Lifeline Reform Order* at ¶ 168; 47 C.F.R. § 54.419.

<sup>20</sup> True Wireless will only include language regarding a Tribal identification number on forms used in states with Tribal areas. See Oklahoma and Rhode Island forms in Exhibit 1. Currently, True Wireless only serves Tribal communities in Oklahoma and Rhode Island.

the income-based criterion, the number of individuals in his or her household.<sup>21</sup> Finally, any prospective subscriber who resides at an address occupied by multiple households must certify as such on True Wireless' Lifeline Application and must complete a separate Lifeline Household Worksheet.<sup>22</sup>

In accordance with 47 C.F.R. § 54.410(d), in its Lifeline Applications, True Wireless will require all Lifeline applicants to certify, under penalty of perjury, that: (1) the subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the subscriber will notify True Wireless within 30 days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit; (3) if the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, that he or she lives on Tribal lands;<sup>23</sup> (4) if the subscriber moves to a new address, that he or she will provide that new address to True Wireless within 30 days; (5) if the subscriber provided a temporary residential address to True Wireless, the subscriber will verify his or her temporary residential address every 90 days upon the final effective date of this rule; (6) the subscriber's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the subscriber's household is not already receiving a Lifeline service; (7) the information contained in the subscriber's application/certification form is true and correct to the best of the subscriber's knowledge; (8) the subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; (9) the subscriber

---

<sup>21</sup> 47 C.F.R. § 54.410(d)(2).

<sup>22</sup> See *Lifeline Reform Order* at ¶ 79.

<sup>23</sup> Because True Wireless' designated service areas only include Tribal areas in Oklahoma and Rhode Island, True Wireless' Lifeline Applications for those states will include this certification. See Oklahoma and Rhode Island forms in Exhibit 1.

acknowledges that he or she may be required to re-certify his or her continued eligibility for Lifeline at any time, and that his or her failure to re-certify as to continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits; and (10) that True Wireless is authorized to (i) access any records required to verify the subscriber's statements on the form and to confirm eligibility under the Lifeline program and (ii) release any records required for the administration of the Lifeline program (*e.g.*, name, telephone number and address), including to USAC, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program.<sup>24</sup>

In accordance with 47 C.F.R. § 54.410(d)(1), True Wireless' Lifeline Application will disclose the following information: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.<sup>25</sup>

Finally, in accordance with 47 C.F.R. § 54.405(c), True Wireless' Lifeline Application will indicate, using easily understood language, (1) that True Wireless' low income targeted service is a Lifeline service; (2) that Lifeline is a government assistance program; (3) that the

---

<sup>24</sup> See Exhibit 1.

<sup>25</sup> *Id.*

service is non-transferrable; (4) that only eligible consumers may enroll in the program; and (5) that the program is limited to one discount per household.<sup>26</sup>

### **C. True Wireless' Procedures for Annual Verification of Lifeline Customers**

In accordance with the requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410(f), True Wireless will annually re-certify all of its Lifeline subscribers by either (1) querying the appropriate eligibility or income databases, confirming that the subscriber continues to meet the program- or income-based eligibility requirements for Lifeline and documenting the results of that review, or (2) obtaining a signed certification from the subscriber that meets the certification requirements set forth in 47 C.F.R. § 54.410(d).

For 2012, True Wireless will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 on a rolling basis, to be completed by the end of 2012, and report the results to USAC by January 31, 2012.<sup>27</sup> True Wireless will notify its subscribers in writing that a failure to respond to the recertification request will result in de-enrollment in the Lifeline program.<sup>28</sup> True Wireless will de-enroll subscribers who do not respond to the annual verification or fail to provide proof of continued eligibility in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(4).

True Wireless will permit subscribers to recertify their eligibility for Lifeline benefits through the following ways: an online form on its website ([www.gotruewireless.com](http://www.gotruewireless.com)); an oral re-certification by calling True Wireless' call center (which would be recorded); or a paper form that could be scanned and e-mailed, faxed or handed to a third party representative and forwarded to True Wireless.

---

<sup>26</sup> *Id.*

<sup>27</sup> *Lifeline Reform Order* at ¶ 130.

<sup>28</sup> *Id.* at ¶ 142.

### **III. TRUE WIRELESS' PLANS FOR COMPLIANCE WITH THE FORBEARANCE CONDITIONS RELATING TO PUBLIC SAFETY AND 911/E911 ACCESS**

True Wireless' existing practices comply with the 911/E911 access conditions set forth in paragraph 373 of the *Lifeline Reform Order*. Specifically, True Wireless currently: (1) provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated, regardless of activation status and availability of minutes, and (2) provides its Lifeline subscribers with E911-compliant handsets and replaces, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services. True Wireless' existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying wireless carrier. True Wireless commits to continue these practices going forward.

### **IV. TRUE WIRELESS' PLANS FOR COMPLIANCE WITH THE COMMISSION'S MARKETING AND DISCLOSURE REQUIREMENTS FOR PARTICIPATION IN THE LIFELINE PROGRAM**

Within six months after the effective date of the *Lifeline Reform Order* (i.e., October 2012), True Wireless will incorporate into its marketing materials<sup>29</sup> for its Lifeline services, in clear, easily understood language: (1) that the service and supported by Lifeline, a government program; (2) that only eligible consumers may enroll in the program; (3) that documentation is necessary for enrollment; and (4) that the benefit is limited to one per household and is non-transferrable.<sup>30</sup> True Wireless also will disclose its name (the ETC) on all marketing materials.<sup>31</sup>

A sample advertisement incorporating this language is attached hereto at Exhibit 2.

---

<sup>29</sup> "Marketing materials" includes, but is 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 *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).

<sup>30</sup> *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).

<sup>31</sup> *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(d).

**V. TRUE WIRELESS' PROCEDURES AND EFFORTS TO PREVENT WASTE, FRAUD AND ABUSE IN CONNECTION WITH LIFELINE FUNDS**

True Wireless shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. According, True Wireless commits to implement a variety of measures and procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual.

**Prevention of Duplicates within True Wireless' Subscriber Base.** At time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits True Wireless' subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. At live events, True Wireless' representatives can access the True Wireless database in order to perform these functions remotely. Once the address is validated for accuracy and format, it is checked against addresses for all True Wireless addresses. If an existing True Wireless subscriber is receiving service at the same address, True Wireless' system will not permit any order for Lifeline service to proceed. True Wireless also conducts additional checks to ensure that the same subscriber is not receiving more than one service by checking its database for the same subscriber name, date of birth and the last four digits of the person's social security number. Moreover, all orders for Lifeline service as subjected to a secondary USPS accuracy and format check the following day. Any corrections needed as a result of the secondary check, such as correcting address format, are promptly entered into True Wireless' system. True Wireless also conducts real-time scans of its database to flag any duplicate addresses, dates of birth, etc. in addition to conducting manual reviews of its subscriber lists prior to filing its FCC Form 497s in order to ensure that it does not claim subsidies for any duplicate addresses.

**Service Activation.** True Wireless will not seek reimbursement for Lifeline service for any subscriber until the subscriber uses the service to either activate the service or to complete an outgoing call.<sup>32</sup> Depending on the underlying wireless carrier utilized, True Wireless' subscribers activate their service either (1) by making an outbound call or (2) upon attempting to make an outbound call, by being automatically routed to an IVR recording at which point the subscriber is prompted to confirm that he or she wishes to activate the account by entering a number on the key pad. In addition, in Texas, the application is not even processed until such time as the applicant's name and address are confirmed as being eligible by the state Lifeline database, which is managed by Solix. Only after a Texas applicant's eligibility is confirmed by Solix is the handset provided or shipped out. Thereafter, the Texas subscriber would be subject to the same IVR process described above.<sup>33</sup>

**Non-Usage Policy.** Long before the release of the *Lifeline Reform Order*, True Wireless voluntarily adopted a policy whereby a subscriber who has not used his or her handset within 60 days is de-enrolled from the Lifeline program (after a 30-day notice period). Upon de-enrollment, True Wireless ceases seeking Lifeline reimbursements for that subscriber. True Wireless' non-usage policy ensures that only subscribers who actually utilize their wireless service continue to receive Lifeline-subsidized service, and that True Wireless only receives Lifeline support for those subscribers who remain enrolled in the program. True Wireless

---

<sup>32</sup> 47 C.F.R. § 54.407(c)

<sup>33</sup> Texas is changing its process to require prepaid wireless providers such as True Wireless to obtain certifications from subscribers and then check subscribers' eligibility by consulting the state database beginning in August 2012. True Wireless will follow these new procedures as soon as they become available. Under the new process, True Wireless will continue its policy of not providing/shipping any handsets until the subscriber's eligibility has been confirmed. True Wireless has been in contact with the Texas Public Utility Commission and understands that it will soon issue a certification form that ETCs will be expected to use in Texas. Once this form has been issued, True Wireless will use that form to enroll subscribers in Texas.

commits to continuing this practice in strict conformance with the requirements of 47 C.F.R. § 54.405(e)(3).

Specifically, after 60 days of non-use,<sup>34</sup> True Wireless will provide notice to the subscriber that failure to use the Lifeline service or provide other confirmation to True Wireless that the subscriber wishes to retain their Lifeline service within 30 days from the date of the de-enrollment notice will result in de-enrollment from the Lifeline program.<sup>35</sup> True Wireless will not request further Lifeline reimbursement for any de-enrolled customer and True Wireless will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>36</sup>

**One Per Household Rule.** True Wireless will implement policies and practices in accordance with the Commission’s rules and the *Lifeline Reform Order* to ensure that it provides only one Lifeline service per household. As described above, True Wireless has already implemented procedures to ensure that True Wireless itself only provides one Lifeline service per household. When the National Lifeline Accountability Database becomes available, True Wireless will fully comply with the requirements of 47 C.F.R. § 54.404 and will utilize the database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant’s residential address is receiving Lifeline service. Finally, if True Wireless has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, for example, due to a violation of the one-per-household rule,

---

<sup>34</sup> Subscribers can “use” the service by: (1) completing an outbound call; (2) purchasing minutes from True Wireless to add to the subscriber’s plan; (3) answering an incoming call from a party other than True Wireless; or (4) responding to a direct contact from True Wireless confirming that the subscriber wants to continue receiving the service. 47 C.F.R. § 54.407(c)(2).

<sup>35</sup> 47 C.F.R. § 54.405(e)(3).

<sup>36</sup> 47 C.F.R. § 54.405(e)(3).

True Wireless will initiate its termination process in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(1).

## **VI. CONCLUSION**

True Wireless submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*, the *Public Notice* and the Commission's rules pertaining to Lifeline. Accordingly, True Wireless respectfully requests expeditious approval of its pending ETC Petition and this Compliance Plan so that True Wireless may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC and may provide service to additional eligible low income consumers in the various states for which it has pending ETC petitions.

Respectfully submitted,



---

Danielle Frappier  
James W. Tomlinson  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue, N.W., Suite 800  
Washington, D.C. 20006-3401  
(202) 973 - 4200

*Counsel to True Wireless, LLC*

June 1, 2012

# Exhibit 1

## Lifeline Applications



90 mins. FREE (funded by Lifeline)

# Arkansas Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date		Contact Phone Number		Last 4 digits of Social Security Number	
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>		Apt:	City	State	Zip Code
		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code

**Multiple households sharing an address:**  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- Federal Public Housing Assistance (Section 8)
- Supplemental Security Income
- National School Lunch Program's free lunch program
- Supplemental Nutrition Assistance Program
- Temporary Assistance to Needy Families
- Medicaid
- Low-Income Home Energy Assistance Program

If you wish to qualify based on income, a different form is required.

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 1900, Toledo, OH 43682-4010

Customer Service: 877-412-1919

Fax: 1-855-254-4611

www.gotruewireless.com



90 mins. FREE (funded by Lifeline)

**Arkansas Lifeline Application Form**

Customer Account Number

Today's Date:

**Fill Out Your Information**

Last Name	First Name	Middle Initial
Birth Date	Contact Phone Number	Last 4 digits of Social Security Number
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>	Apt: <input type="checkbox"/> Permanent Address	City <input type="checkbox"/> Temporary Address
Billing Address (if different)	Apt:	City
		State
		Zip Code

**Multiple households sharing an address:**  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

**Lifeline Application**

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>• Last year's federal or state tax return</li> <li>• Current income statement from an employer or paycheck stub (must cover 3 consecutive months within the previous 12 months)</li> <li>• A Social Security statement of benefits</li> <li>• A retirement/pension statement of benefits</li> <li>• An Unemployment/Workers' Compensation statement of benefit</li> <li>• Federal notice letter of participation in General Assistance</li> <li>• Divorce decree, child support award or other official document containing income information</li> </ul>	<b>Check or complete</b>	<b>Persons in Household</b>	<b>Annual Income</b>	<b>Monthly Income</b>
	<input type="checkbox"/>	1	\$15,079	\$1,257
	<input type="checkbox"/>	2	\$20,425	\$1,702
	<input type="checkbox"/>	3	\$25,771	\$2,148
	<input type="checkbox"/>	4	\$31,117	\$2,593
	<input type="checkbox"/>	5	\$36,463	\$3,039
	<input type="checkbox"/>	6	\$41,809	\$3,484
	<input type="checkbox"/>	7	\$47,155	\$3,930
	<input type="checkbox"/>	8	\$52,501	\$5,375
	___ # in Household	For each add'l person, add:	\$5,346	\$445

**Certification Under Penalty of Perjury**

I certify under penalty of perjury that (check or initial):

- \_\_\_ I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- \_\_\_ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- \_\_\_ I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- \_\_\_ I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- \_\_\_ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- \_\_\_ I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- \_\_\_ I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- \_\_\_ If I move to a new address, I will provide the new address to True Wireless within 30 days.
- \_\_\_ If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- \_\_\_ I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- \_\_\_ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 1900, Toledo, OH 43682-4010

Customer Service: 877-412-1919

Fax: 1-855-254-4611

www.gotruewireless.com



90 mins. FREE (funded by Lifeline)

# Maryland Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial
Birth Date	Contact Phone Number		Last 4 digits of Social Security Number	

**Residential Address**  
 (No P.O Boxes for res. Address) This is my (check one):  Permanent Address  Temporary Address

Apt: City State Zip Code

**Billing Address (if different)**

Apt: City State Zip Code

**Multiple households sharing an address:**  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- Federal Public Housing Assistance (Section 8)
- Supplemental Security Income
- Temporary Disability Assistance Program (TDAP)
- Supplemental Nutrition Assistance Program
- Temporary Assistance to Needy Families
- National School Lunch Program's free lunch program
- Medicaid
- Medical Assistance (MA)
- Maryland Energy Assistance Program (MEAP)
- Low-Income Home Energy Assistance Program
- Temporary Cash Assistance (TCA)
- Electric Universal Service Program (EUSP)

## Certification Under Penalty of Perjury

- I certify under penalty of perjury that (check or initial):
- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
  - I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
  - I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
  - I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
  - I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
  - I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
  - I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
  - If I move to a new address, I will provide the new address to True Wireless within 30 days.
  - If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
  - I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
  - I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature \_\_\_\_\_ Date \_\_\_\_\_



90 mins. FREE (funded by Lifeline)

# Maryland Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name	First Name	Middle Initial
Birth Date	Contact Phone Number	Last 4 digits of Social Security Number
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>	Apt: <input type="checkbox"/> Permanent Address	City <input type="checkbox"/> Temporary Address
Billing Address (if different)	Apt:	City
		State
		Zip Code

Multiple households sharing an address:  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

## Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>• Last year's federal or state tax return</li> <li>• Current income statement from an employer or paycheck stub (must cover 3 consecutive months within the previous 12 months)</li> <li>• A Social Security statement of benefits</li> <li>• A retirement/pension statement of benefits</li> <li>• An Unemployment/Workers' Compensation statement of benefit</li> <li>• Federal notice letter of participation in General Assistance</li> <li>• Divorce decree, child support award or other official document containing income information</li> </ul>	<b>Check or complete</b> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  <input type="checkbox"/> # in Household	<b>Persons in Household</b> 1 2 3 4 5 6 7 8 For each add'l person, add:	<b>Annual Income</b> \$15,079 \$20,425 \$25,771 \$31,117 \$36,463 \$41,809 \$47,155 \$52,501 \$5,346	<b>Monthly Income</b> \$1,257 \$1,702 \$2,148 \$2,593 \$3,039 \$3,484 \$3,930 \$5,375 \$445
--	---	--	---	--

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 1900, Toledo, OH 43682-4010

Customer Service: 877-412-1919

Fax: 1-855-254-4611

www.gotruewireless.com



- 1000 mins. \$1.00 (includes \$34.25 in Lifeline Funding)
- Unlimited mins. \$6.75 (includes \$34.25 in Lifeline Funding)

# Oklahoma Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name	First Name	Middle Initial
Birth Date	Contact Phone Number	Last 4 digits of Social Security # or Tribal ID
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>	Apt: <input type="checkbox"/> Permanent Address	City <input type="checkbox"/> Temporary Address
Billing Address (if different)	Apt:	City
I certify I live on Tribal land: <input type="checkbox"/> Yes <input type="checkbox"/> No	State	Zip Code
Multiple households sharing an address: <input type="checkbox"/> I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.		

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8)    | <input type="checkbox"/> Supplemental Security Income  | <input type="checkbox"/> Vocational Rehabilitation (including hearing impaired)       |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program        | <input type="checkbox"/> Temporary Assistance to Needy Families                                    | <input type="checkbox"/> National School Lunch Program's free lunch program           |
| <input type="checkbox"/> Medicaid   | <input type="checkbox"/> Head Start (only those households meeting its income qualifying standard) | <input type="checkbox"/> Tribally administered Temporary Assistance to Needy Families |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program        | <input type="checkbox"/> Oklahoma Sales Tax Relief   |   |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Bureau of Indian Affairs general assistance                               |   |

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 1900, Toledo, OH 43682-4010  
 Customer Service: 877-412-1919 Fax: 1-855-254-4611

www.getruewireless.com



1000 mins. \$1.00 (includes \$34.25 in Lifeline Funding)

Unlimited mins. \$6.75 (includes \$34.25 in Lifeline Funding)

# Oklahoma Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name	First Name	Middle Initial
Birth Date	Contact Phone Number	Last 4 digits of Social Security # or Tribal ID
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>	Apt: <input type="checkbox"/> Permanent Address	City <input type="checkbox"/> Temporary Address
		State
		Zip Code
Billing Address (if different)	Apt:	City
		State
		Zip Code

I certify I live on Tribal land:  Yes  No

**Multiple households sharing an address:**  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

## Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>• Last year's federal or state tax return</li> <li>• Current income statement from an employer or paycheck stub (must cover 3 consecutive months within the previous 12 months)</li> <li>• A Social Security statement of benefits</li> <li>• A retirement/pension statement of benefits</li> <li>• An Unemployment/Workers' Compensation statement of benefit</li> <li>• Federal notice letter of participation in General Assistance</li> <li>• Divorce decree, child support award or other official document containing income information</li> </ul>	<b>Check or complete</b>	<b>Persons in Household</b>	<b>Annual Income</b>	<b>Monthly Income</b>
<input type="checkbox"/>	1	\$15,079	\$1,257	
<input type="checkbox"/>	2	\$20,425	\$1,702	
<input type="checkbox"/>	3	\$25,771	\$2,148	
<input type="checkbox"/>	4	\$31,117	\$2,593	
<input type="checkbox"/>	5	\$36,463	\$3,039	
<input type="checkbox"/>	6	\$41,809	\$3,484	
<input type="checkbox"/>	7	\$47,155	\$3,930	
<input type="checkbox"/>	8	\$52,501	\$5,375	
___ # in Household	For each add'l person, add:	\$5,346	\$445	

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.

I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.

I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.

I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.

If I move to a new address, I will provide the new address to True Wireless within 30 days.

If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.

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

I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 1900, Toledo, OH 43682-4010  
 Customer Service: 877-412-1919 Fax: 1-855-254-4611

www.gotruewireless.com



90 mins. FREE (funded by Lifeline)

# Rhode Island Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name			First Name			Middle Initial		
Birth Date			Contact Phone Number			Last 4 digits of Social Security # or Tribal ID		

**Residential Address**  
 (No P.O Boxes for res. Address) This is my (check one):  Permanent Address  Temporary Address

**Billing Address (if different)** Apt: City State Zip Code

I certify I live on Tribal land:  Yes  No

**Multiple households sharing an address:**  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8)    | <input type="checkbox"/> Supplemental Security Income  | <input type="checkbox"/> National School Lunch Program's free lunch program            |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program        | <input type="checkbox"/> Temporary Assistance to Needy Families Program                            | <input type="checkbox"/> Rhode Island Medical Assistance Program                       |
| <input type="checkbox"/> Medicaid   | <input type="checkbox"/> Family Independence Program   | <input type="checkbox"/> Rhode Island Pharmaceutical Assistance to the Elderly         |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program        | <input type="checkbox"/> General Public Assistance   | <input type="checkbox"/> Bureau of Indian Affairs General Assistance                   |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Head Start (only those households meeting its income qualifying standard) | <input type="checkbox"/> Tribally administered Temporary Assistance for Needy Families |

If you wish to qualify based on income, a different form is required.

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 1900, Toledo, OH 43682-4010

Customer Service: 877-412-1919

Fax: 1-855-254-4611

www.gotruewireless.com



90 mins. FREE (funded by Lifeline)

# Rhode Island Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Middle Initial \_\_\_\_\_

Birth Date \_\_\_\_\_ Contact Phone Number \_\_\_\_\_ Last 4 digits of Social Security # or Tribal ID \_\_\_\_\_

Residential Address \_\_\_\_\_ Apt: \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
(No P.O Boxes for res. Address) This is my (check one):  Permanent Address  Temporary Address

Billing Address (if different) \_\_\_\_\_ Apt: \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
I certify I live on Tribal land:  Yes  No

Multiple households sharing an address:  I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

## Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:	Check or complete	Persons in Household	Annual Income	Monthly Income
<ul style="list-style-type: none"> <li>Last year's federal or state tax return</li> <li>Current income statement from an employer or paycheck stub (must cover 3 consecutive months within the previous 12 months)</li> <li>A Social Security statement of benefits</li> <li>A retirement/pension statement of benefits</li> <li>An Unemployment/Workers' Compensation statement of benefit</li> <li>Federal notice letter of participation in General Assistance</li> <li>Divorce decree, child support award or other official document containing income information</li> </ul>	<input type="checkbox"/>	1	\$15,079	\$1,257
	<input type="checkbox"/>	2	\$20,425	\$1,702
	<input type="checkbox"/>	3	\$25,771	\$2,148
	<input type="checkbox"/>	4	\$31,117	\$2,593
	<input type="checkbox"/>	5	\$36,463	\$3,039
	<input type="checkbox"/>	6	\$41,809	\$3,484
	<input type="checkbox"/>	7	\$47,155	\$3,930
	<input type="checkbox"/>	8	\$52,501	\$5,375
	____ # in Household	For each add'l person, add:	\$5,346	\$445

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- \_\_\_ I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- \_\_\_ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- \_\_\_ I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- \_\_\_ I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- \_\_\_ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- \_\_\_ I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit.
- \_\_\_ I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- \_\_\_ If I move to a new address, I will provide the new address to True Wireless within 30 days.
- \_\_\_ If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- \_\_\_ I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- \_\_\_ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature \_\_\_\_\_ Date \_\_\_\_\_

# Exhibit 2

## Sample Marketing Material

**90 FREE Monthly Minutes**



**FREE  
Great  
Phone**

**ENROLL TODAY!**

[www.gotruewireless.com](http://www.gotruewireless.com)



***Free 90 Monthly Minutes***

**Free Enrollment**

**No Contract**

**No Deposit**

**No Credit Check**

**[www.gotruewireless.com](http://www.gotruewireless.com)**



This offering is a Lifeline-supported service. Lifeline is a government assistance program and only eligible consumers may enroll in the program. EBT card or government documentation that clearly shows proof of participation in EBT (food stamps) is required. Please call for other qualifying programs in your state and requirements. Lifeline is limited to one benefit per household, consisting of either wireline or wireless service, and is not transferable.

# Exhibit 3

## Script for Oral Certifications

## Verbal Certification Script for True Wireless Call Center

Good afternoon Mr./Mrs. Let me confirm your information.

1. Please state your first and last name for our records
2. Your physical address is \_\_\_\_\_. (if address is temporary, note in file) (if multiple “households” at same physical address they **MUST** complete “lifeline Household Worksheet”
3. The last four digits of your social security number are \_\_\_\_\_. Your date of birth is \_\_\_\_\_.
4. IF program-based-The government assistance you are on is \_\_\_\_\_.

IF income based-The number of persons in your household is \_\_ and your annual or monthly income is \$\_\_\_\_\_.

5. Very Good. Now if you will confirm you qualify for Lifeline by answering yes or no to each of these statements under penalty of perjury:
  - You are aware that Lifeline is a federal government assistance program, that you may not transfer your service to anyone, and only one Lifeline discount per household is allowed. If you currently receive Lifeline from another phone company, you will notify them that you no longer qualify for their Lifeline service. (yes or no)
  - You are qualified to receive Lifeline and will notify True Wireless within 30 days if you no longer receive \_\_\_\_\_government assistance (income-based: if your monthly income increases) or someone else in your household receives Lifeline. (yes or no)
  - You understand that if you move, you will need to provide us with your new address within 30 days. (yes or no)
  - True Wireless will contact you once per year to verify that you remain eligible and you understand that if you do not respond or are no longer eligible, you will lose your Lifeline benefits. (yes or no)
  - You authorize True Wireless to verify your eligibility with, and release your personal information to, entities and databases that manage the Lifeline program, including the Universal Service Administrative Company. (yes or no)
  - **If Tribal:** Your address appears to be located on Oklahoma Tribal lands. Can you verify that this is correct? (yes or no)
  - You understand that providing false information to receive Lifeline benefits can result in fines, imprisonment or denial of benefits, and certify that all the information you have provided is true and correct to the best of your knowledge. (yes or no)

[The applicant **MUST** say “yes” to EACH of the questions or the application **MUST** be denied.]

6. Mr. Mrs/\_\_\_\_ thank you and your order will be processed and your phone mailed to you as soon as we receive your proof of benefit. Thank you for calling True Wireless and have a great day.