Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
TerraCom, Inc. Blanket Forbearance Compliance Plan	)	
Petition of TerraCom, Inc. for Limited Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Low Income Support Only	)	

Exhibit 4

DECLARATION OF DALE SCHMICK

VP, TerraCom, Inc.

1). My name is Dale Schmick. I am the Vice President of TerraCom, Inc. ("TerraCom"). As part of my duties, I am in charge of ensuring that TerraCom is in compliance with all applicable regulations and laws. My business address is 401E Memorial Road, Suite 400, Oklahoma City, OK 73114. TerraCom provides over 200,000 combined wireless and wireline lines to low income subscribers through the Universal Service Administrative Company's ("USAC's") Lifeline program. TerraCom sells its wireless and wireline services through 1 wholly-owned retail store and through inbound online sales. TerraCom has been in business for over almost 8 years and employs approximately 73 people.

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2.) The purpose of my declaration is to satisfy the requirements of new rule §54.202(a)(4), which requires carriers seeking "blanket forbearance" to provide Lifeline-only service to demonstrate, with detailed information, that they are financially and technically capable of providing Lifeline-only wireless services. Consistent with the *Lifeline Reform Order*, and the rule implementing this obligation, I will provide more than sufficient information to satisfy the Commission that TerraCom meets these requirements.

3.) I will first address TerraCom's technical capability to provide Lifeline-only service. While a fair amount of TerraCom's total wireless service offering is satisfied by its underlying carriers' existing certifications that they have sufficient back up power to remain functional in an emergency, there are portions of TerraCom's wireless service—as consumed by TerraCom's customers—that are provided over TerraCom owned, or controlled, facilities. In compliance with rule §54.202(a)(3), TerraCom certifies that it does maintain sufficient back up power for its own facilities to ensure that the total TerraCom customer experience will be preserved in the case of an emergency situation. In other words, TerraCom has sufficient power to keep its facilities running in tandem with its wireless wholesale partners in the case of an emergency.

4.) With respect to the detailed financial information the Commission has requested in the *Lifeline Reform Order,*[1] the Commission explained that a carrier seeking "blanket forbearance" (from the Act's facilities requirement) could prove that it is financially and technically capable of becoming a Lifeline-only ETC by addressing certain factors. Specifically, in order to demonstrate its financial ability to provide service, TerraCom can certify that: 1) it offers service to low-income customers—all low income customers, and not just those customers that are

[1] *Lifeline Reform Order*, ¶388.

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eligible to receive reimbursements from the Lifeline program; 2) TerraCom has been in business for almost 8 years; 3) TerraCom has never been exclusively dependent on receiving Lifeline subsidies to operate, and to ensure that all its consumers will receive the service they have been promised; 4) TerraCom has never been subject to state or federal enforcement sanctions, and TerraCom has never been the subject of a state revocation proceeding. Thus, TerraCom has almost 8 years of successfully providing valuable customer service (wireline and wireless) and growing its business as a Lifeline-only ETC.

5.) Finally, while not specifically requested, TerraCom has decided to offer up a little more financial information designed to assure the Commission that it is financially capable of providing good quality, reliable service to customers. First, TerraCom is a financially stable and liquid service provider. This fact is relevant in assessing TerraCom's lack of reliance on Universal Service Fund reimbursements in order to continue providing service to end users.

6.) Finally, the most significant piece of information that TerraCom can possibly convey to assure the Commission of its ability to successfully provide service (aside from TerraCom's long track record of successfully providing Lifeline service) is its good commercial relationship with all of its vendor partners. I can certify that TerraCom is current in all of its accounts with all relevant vendors who contribute to the provision of TerraCom's wireless service. This provides the Commission with the additional assurance that other market participants—parties who will lose money if TerraCom is not financially capable of providing wireless service—are confident in TerraCom's ability to continue to provide service to its customers.

7.) Taking all certifications together, TerraCom has more than demonstrated—within the financial and technical capability requirement—that it has addressed all of the questions raised in

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the Order, and provided additional assurances to the Commission regarding TerraCom's ability to satisfy this requirement. Then, of course, there is the simpler demonstration contained herein, which shows that TerraCom's long history of providing service in compliance with all relevant state and federal rules—and at no cost to the Fund (to the best of TerraCom's knowledge)—for the past 8 years is more than ample demonstration that TerraCom meets the Commission's new requirements for demonstrating financial and technical capability to be a service provider.

8.) This concludes my declaration.

Dale Schmick

Dated: 3/2/12