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June 29, 2012

VIA ELECTRONIC DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-A325
Washington, DC 20554

Re: **WC Docket Nos. 09-197 and 11-42**
Compliance Plan of Airvoice Wireless, LLC

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, transmitted herewith on behalf of Airvoice Wireless, LLC ("Airvoice"), is notice of an *Ex Parte* presentation in connection with the above-referenced proceedings.

On June 28, 2012, Melissa Kallabat, Wally Dickow and Kenny Hannawa, of Airvoice, Chuck Campbell of CGM, LLC, and the undersigned counsel for Airvoice, met with Kimberly Scardino, Jonathan Lechter, Divya Shenoy and Alex Minard, all of the Wireline Competition Bureau, to discuss the status of Airvoice's pending Lifeline Compliance Plan.

During the meeting, Ms. Kallabat provided a brief summary of Airvoice's financial capability, current operations, distribution methods and customer service procedures and how Lifeline customers will be enrolled. The summary was supplemented by a presentation deck, attached hereto as Attachment A.

ATTACHMENT A

FCC Company Overview Meeting

**FEELSAFE
WIRELESS**

Brought to you by

June 28, 2012



Agenda

- Introduction of Companies
- Company Lifeline Product Offerings
- Marketing/ Advertising Compliance
- End User Enrollment
- Annual Certification
- Procedures Addressing Waste, Fraud, and Abuse
- Questions

FeelSafe Wireless

brought to you by Airvoice Wireless

Airvoice Wireless is a leading prepaid wireless carrier that provides service within the United States. With headquarters in Bloomfield Hills, MI, our company operates independently; utilizing digital, nationwide GSM technology. Our mission is to provide dependable wireless service to our customers at an affordable price along with outstanding customer service.

Founded in 1999, Airvoice Wireless originally only existed on the US West Coast with a limited coverage area. In the year 2000, Airvoice began offering service on the then cutting-edge TDMA technology. This allowed the company to provide nationwide service. Now able to reach more customers, Airvoice Wireless began to flourish within the prepaid market.

In 2005, the company switched networks from TDMA to the Global System for Mobile Communications (GSM) network. Now utilizing breakthrough SIM technology, Airvoice was able to provide its customers better network coverage and more digital features.

- Currently Provides Lifeline Service in:
FeelSafe Wireless will be offering its services in the following states:
MI, WI, TX, PA, CA and also the 10 federal jurisdiction states.
- Current Retail Offerings
 - www.FeelSafeWireless.com
 - Existing agent/distribution network throughout the U.S.

FeelSafe Wireless & its Lifeline Product Offerings

- FeelSafe Wireless is financially and technically capable of providing the supported Lifeline Service
 - Airvoice Wireless has been in business for over 13 years in the Wireless industry. We utilize the GSM network through AT&T Mobility.
 - Airvoice Wireless currently has over 150,000 wireless subscribers as of today.
 - Ownership
 - Jim Bahri- CEO
 - Kenny Hannawa- President
 - Wally Dickow- Vice President

FeelSafe Wireless & its Lifeline Product Offerings

Key Management Experience:

Jim Bahri- CEO

Been in the retail business over 40 years. Currently been in the wireless business for over 13 years. Currently involved in the day to day operations at Airvoice Wireless.

Kenny Hannawa- President

Been in the retail business over 40 years. Currently been in the wireless business for over 13 years. Currently involved in the day to day operations at Airvoice Wireless.

FeelSafe Wireless & its Lifeline Product Offerings

Wally Dickow- Vice President

Been in the wireless industry for over 20 years. Currently involved in the day to day operations at Airvoice Wireless.

Melissa Kallabat- Director of Operations

Been in the wireless industry for over 9 years. Handles day to day operations of customer service call center. Created and continues to enforce company rules and policies. Excellent at Resolving service related phone issues for customers accounts.

FeelSafe Wireless & its Lifeline Product Offerings

In compliance with the amended section 54.202, FeelSafe Wireless certifies:

- It will comply with the service requirements applicable to the support that it receives;
- It has the ability to remain functional in emergency situations;
- It will satisfy applicable consumer protection and service quality standards; and
- It is financially and technically capable of providing Lifeline service.

FeelSafe Wireless Lifeline Product Offerings

- Public Safety and 911/ E911 Access:
 - FeelSafe Wireless will ensure that all handsets used in connection with its Lifeline service are E911- compliant.
 - FeelSafe Wireless will provide its Lifeline customers with access to 911 and E911 services:
 - Through its underlying carrier, AT&T
 - At the time of Lifeline service initiation
 - Regardless of activation status and minute availability.

Marketing & Advertising Compliance

In compliance with the marketing and disclosure requirements, all of FeelSafe Wireless's marketing materials will include:

- Disclose ETC's name under which it does business;
- Explain in clear, easily understood language the following:
 - The service is a Lifeline service;
 - Only eligible consumers may enroll in the program;
 - What documentation is necessary for enrollment;
 - The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - Lifeline is a government benefit program; 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; and
 - Lifeline service is non-transferable.

Marketing & Distribution Methods

- Direct Sales – Electronic: Typically a face-to-face enrollment transaction occurring in retail store or at an event. All documentation can be witnessed in real-time and end user walks away with phone.
- Internet Sales: Self-driven enrollment by end user who signs self-certification form electronically to complete transaction. Proof of identity and program eligibility must be mailed/faxed, delaying shipment of phone.
- Phone Sales: Real-time, but proof of identity, program eligibility and completed self-certification form must be mailed/faxed, delaying shipment of phone.

End User Enrollment

Company's Enrollment Process requires confirmation of the following 6 items:

1. Confirms applicant is not currently receiving a subsidy from another carrier.
 - Applicant certifies under penalty of perjury.
 - Specifically mentions other providers in certification.
2. Confirms Applicant's Identity. (see government issued picture ID)
3. Confirm program or income eligibility. (see proof of participation or annual household income)
4. Confirm valid residence address and whether the address is permanent/ temporary or multi-household. (Validates address via Melissa Data)
 - Company performs duplicate check into an internal and pooled external database.
5. Procures all required authorizations and certifications.
6. Confirm applicant receives handset and personally activates or uses the phone prior to seeking reimbursement from Universal Service Fund.

Annual Recertification

- Every year, FeelSafe Wireless will re-certify each lifeline end user. The results of this recertification will be sent to USAC and State PUC's by January 31st each year.
- All customers who fail to respond to recertification attempts within 30 days will be given an written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program.
- Additionally, FeelSafe Wireless will follow any state-specific recertification requirements.

Procedures Addressing Waste, Fraud, & Abuse

- FeelSafe Wireless strives for compliance in all policies & procedures surrounding its Lifeline Program.
 - Marketing/ Advertising
 - End User Initial Enrollment & Annual Certification
 - Training and Monitoring of Field Reps
 - Customer Non Usage & De-Enrollment

Procedures Addressing Waste, Fraud, & Abuse

- Subscriber Usage:
 - 60 Day non usage policy
- Duplicate Detection:
 - CGM
 - National Database (when operational)
 - BeQuick- Fusion Platform
- Independent Biennial Audits?

QUESTIONS?

Thank You!