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

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
	)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization	)	
	)	
Aegis Telecom, Inc. Compliance Plan	)	

AEGIS TELECOM, INC.'S WIRELINE COMPLIANCE PLAN

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorney for Aegis Telecom, Inc.

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I. INTRODUCTION

Aegis Telecom, Inc. ("Aegis" or the "Company") is a prepaid competitive local exchange telecommunications carrier ("CLEC") seeking designation as an Eligible Telecommunications Carrier ("ETC") solely for the purpose of participating in the Lifeline program.[1] Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission ("FCC" or "Commission") has forborne from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.[2] Aegis is able to provide service in part over its own facilities through the use of unbundled network elements (UNEs). According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own

[1] This Compliance Plan is for the Company's wireline operations only, which the Company operates under the name Aegis Telecom, Inc. The Company has a separate Compliance Plan pending for its wireless operations, which the Company operates under Aegis Telecom, Inc. dba Off The Hook Telecom.

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

facilities (including UNEs) and resale of another carrier's services.[3] However, obtaining and maintaining UNEs is costly, and some state public utility commissions do not recognize UNEs as facilities. Therefore, Aegis will avail itself of the FCC's conditional grant of forbearance and, by its attorney, hereby files its Compliance Plan outlining the measures it will take to implement the conditions of forbearance outlined in the *Order*.[4] Given the severe economic environment that is forcing many low-income customers to forego telecommunications service, Aegis respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

II. BACKGROUND

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

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

[3] 47 C.F.R. § 54.201(f) states, "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." The term "facilities" under Section 54.201 is defined as "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part" (47 C.F.R. § 54.201(e)). The Company's use of UNEs, including §251 loops, or equivalents thereof, commingled with § 271 elements, meets this definition of "facilities."

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

[5] *See Order* at ¶¶ 368, 373 and 379.

and (b) starting on the effective date of this Order]; and

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

III. AEGIS WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER

Aegis will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireline service to customers throughout the United States.[6]

A. Access to 911 and E911 Services

In the *Order*, the Commission requires Aegis to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.[7] The Commission and consumers are hereby assured that all Aegis customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Aegis phones as long as the phone remains connected, even if there are no minutes remaining on the account. Aegis resells the network services of incumbent local exchange carriers ("ILEC") and the ILECs route 911 calls from the Company's customers in the same manner as 911 calls from their own customers. As a wireline carrier, the requirement to provide only E911-compliant handsets does not apply to Aegis.

[6] To the extent that future changes in federal regulations render the commitments herein invalid, the Company reserves the right to modify its operations in accordance with federal regulations in effect at that time.
[7] *See Order* at ¶ 373.

B. Consumer Eligibility and Enrollment

Aegis will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility, Aegis will rely on the state identification or database.[8] In instances where Aegis is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

1. One-Per-Household

Aegis understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as "any individual or group of individuals who are living together at the same address as one economic unit."[9] Upon receiving an application for Lifeline support, Aegis will check the duplicates database, once in place, to determine whether an individual at the applicant's residential address is currently receiving Lifeline-supported service. Aegis will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If Aegis determines that an individual at the applicant's address is currently receiving Lifeline-supported service, Aegis will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, Aegis will require applicants to complete and submit to the Company USAC's one-per-household template, which will contain the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that

[8] *See Order* at ¶ 98.
[9] *See Order* at ¶ 74.

he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income; and (4) the penalty for a consumer's failure to make the required one-per-household certification (i.e., de-enrollment).[10] Aegis will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

On its certification forms, a draft sample of which is attached,[11] Aegis will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery address), unless they only have a temporary address, and a billing address for the service, if different (which may include a P.O Box or General Delivery address).[12] Aegis will inquire on its certification forms whether or not the applicant's address is a temporary one.[13] If and when the 90-day verification rules becomes effective, Aegis will notify the consumer that if they have a temporary address, the Company will contact the consumer every 90 days, by phone or mail, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of Aegis' attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program.[14] Also on its certification forms, Aegis will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.[15] If the subscriber has moved, Aegis will update the duplicates database, once in place,

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[10] *See Order* at ¶ 78.
[11] *See* Exhibit A. The draft form remains subject to change, but substantially reflects the content of the Company's application.
[12] *See Order* at ¶ 85.
[13] *See Order* at ¶ 89.
[14] *See id.* As of the date of filing of this Compliance Plan, this requirement has not been approved pursuant to the Paperwork Reduction Act.
[15] *See Order* at ¶ 85.

with the information within 10 business days of receipt of the information.[16]

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

2. Initial and Annual Certification

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

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

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

[16] *See id.*

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

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

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

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

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

ensure that the applicant understands applicable eligibility requirements. Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.[17]

Enrollment by phone. Aegis anticipates to primarily enroll customers via the phone, whereby the Company is able to verbally explain the Lifeline program and its eligibility requirements, including required information and disclosures. Aegis' call center is staffed by Telecom Service Bureau ("TSB") employees ("agent(s)" or "representative(s)"). When a prospective customer calls in, a representative will collect and input the required information into an electronic copy of the Company's application form, at which point they will validate the address via a USPS/Melissa Database, check the information against Aegis' internal database to confirm that the applicant is not already receiving a Lifeline subsidy from the Company,[18] and review all certifications and disclosures verbally with the applicant.[19] If the customer indicates on the application form that their address is a multi-household residence, a representative will require the applicant to complete USAC's one-per-household template as well. If an eligibility database is available, the representative will query the database to determine eligibility. Until the Company implements IVR technology, the representative will advise the applicant that they will receive a

[17] *See Order* at ¶ 168.

[18] Moreover, before filing its Form 497 Aegis' subsidy data is checked against a pooled database of all other TSB companies to prevent duplicate subsidy requests across multiple carriers. When it becomes available, the Company will query the National Accountability Database prior to enrolling customers in its Lifeline program.

[19] When the Company implements IVR technology, the representative will make sure the applicant verbally acknowledges each required certification before moving onto the next, and will obtain the applicant's signature via IVR. Customers will then be able to complete USACs one-per-household template, when applicable, over the phone as well.

copy of Aegis' Lifeline certification form in the mail along with a postage-prepaid return envelope, and that they are required to return the completed form to Aegis (along with verification of benefits, if no eligibility database is available) before their Lifeline service can be activated. The representative will explain how to submit the required documentation to the Company as well as what documentation qualifies as proof of benefits. The application will be placed in a "hold" status and Aegis' system will automatically mail a welcome letter along with the Lifeline certification form for the applicant to complete and sign (and USAC's one-per-household template, when applicable, and a request for verification of benefits, if no eligibility database is available), as well as a postage-prepaid envelope to return all documentation to Aegis. When Aegis receives the applicant's completed form(s) and, if applicable, proof documentation, a representative will review the documentation and complete and sign the "Office Use Only" section of the application form, which will record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). Aegis will destroy copies of proof documentation and initiate provisioning of the phone line with the underlying carrier for eligible customers.

Enrollment online. Prospective customers will be able to fill out an application form online and sign electronically. Aegis will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.[20] If the customer indicates that their address is a multi-household residence, online interface will require the applicant to complete USAC's one-per-household template as well. If no eligibility database is available, the online interface will advise the applicant that they are required to provide verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company as well as what

[20] *See Order* at ¶ 123.

documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). If no eligibility database is available, the application will be placed in a "hold" status until the Company receives copies of the applicant's proof documentation, at which point a representative will review the documentation and complete and sign the "Office Use Only" section of the application form, which will record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). Aegis will destroy copies of proof documentation and initiate provisioning of the phone line with the underlying carrier for eligible customers.

Aegis will determine eligibility utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a),(b)), as well as any additional state-specific criteria. Prior to enrolling a new subscriber, Aegis will check the eligibility of low-income consumers first by accessing state or federal social services electronic eligibility databases, where available.[21] If a database is used to establish eligibility, Aegis will not require documentation of the consumer's participation in a qualifying federal program; instead, Aegis or its representative will note in its records a description of what specific data was relied upon to confirm the consumer's initial eligibility for Lifeline.[22] However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for Aegis to check electronic databases for eligibility, Aegis will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.[23] Aegis will require acceptable documentation both for income eligibility and for program eligibility. The Company will not

[21] *See Order* at ¶ 97.
[22] *See Order* at ¶ 98.
[23] *See Order* at ¶ 99.

retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility.[24] Aegis understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Aegis remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.[25]

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

3. Annual Re-Certification

Aegis understands that it must re-certify the eligibility of its entire Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013, and the Company may elect to perform this re-certification on a rolling basis throughout the year.[26] By December 31, 2012, Aegis will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by email, or otherwise

[24] *See Order* at ¶ 101.
[25] *See Order* at ¶ 110.
[26] *See Order* at ¶ 130.

through the Internet—to confirm their continued eligibility.[27] The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. Aegis will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section III.B.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Aegis understands that such certifications may be obtained through a written format or an IVR system, and will use one or more of such options for its certifications.[28]

Alternatively, where a database containing consumer eligibility data is available, Aegis (or state agency or third-party, where applicable) will instead query the database by the end of 2012 and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, Aegis will contact the subscriber every year during the annual certification process to obtain a valid address.[29] After 2012, Aegis will continue to annually certify the continued eligibility of its entire subscriber base, either by accessing a qualifying database, or by electing to have USAC administer the self-certification process on the Company's behalf.[30]

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

(1) that the Company has procedures in place to review consumers'

[27] *See id.*
[28] *See Order* at ¶ 132.
[29] *See Order* at ¶ 131.
[30] *See Order* at ¶ 133.

documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state, and

(2) that the Company is in compliance with all federal Lifeline certification procedures.[31]

C. Other Reforms to Eliminate Waste, Fraud and Abuse

Aegis shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Company customers from engaging in such abuse of the program, inadvertently or intentionally. The Company's service plans offer landline calling for a monthly fee, and thus do not invite instances of duplicative support or present the broader concerns regarding waste, fraud and abuse that arise from the "free" plans offered by many prepaid wireless providers. For this reason, there is no need for the Company to implement a customer usage requirement.[32]

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

As detailed in section III.B.2, Aegis requires the applicant to provide their date of birth

[31] *See Order* at ¶ 126-27.
[32] The Company is not required to implement customer usage requirements. See *Order* at ¶ 257.

(DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor the Company representative can forge certification forms based on false names and addresses. Once the applicant's identity is confirmed, Aegis verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, Aegis checks any available eligibility database. If one is not available, the applicant is required to provide proof of eligibility. This prevents ineligible applicants from receiving the subsidy.

Aegis validates the address of the applicant via a USPS/Melissa Database to ensure the address is correct. In order to prevent duplicate subsidies, the customers is required to affirm verbally and in writing that they (and, to the best of their knowledge, no one else in their household) do not currently receive a Lifeline subsidy. Company software checks the name/address combination for duplicates against the Company's client base and the representative details the one-per-household rule with the applicant.

1. National Lifeline Accountability Database

Aegis will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Aegis will provide to the database subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.[33] Aegis will provide the information listed above for existing subscribers within 60 days of Commission notice that the database is capable of accepting subscriber information.[34]

Furthermore, on its certification form, Aegis will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name, telephone number, and address will be divulged to USAC (the administrator of the program)

[33] *See Order* at ¶ 189.
[34] *See Order* at ¶ 190.

and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.[35]

Within 30 days following Commission notice that the database is capable of accepting queries, Aegis will query the database to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from the Fund.[36]

2. Toll Limitation Service

As a local exchange carrier, Aegis distinguishes between toll and non-toll calls. Therefore, the Company offers toll limitation service (TLS) at no cost to its Lifeline customers in order to afford them the ability to manage the cost of their monthly service plans and avoid higher expenditures that could prove to be devastating to a household of limited means. Aegis provides unlimited minutes per month available for local calls only and a separate pool of minutes available for long distance calls (toll control). Customers may purchase additional long distance minute packages in advance or, with payment of a deposit, may elect long distance calling on a postpaid basis. Customers may also opt out of the long distance minutes provided by Aegis and either choose a different long distance provider, or request that the option for long distance calls be blocked altogether (toll block). Aegis incurs a monthly fee for both toll block and toll control (the Company purchases resold TLS with periodic agreements sometimes purchased months in advance), and will thus seek reimbursement from the USF for TLS provided to eligible Lifeline subscribers. Aegis understands that TLS support is currently limited to $3.00 per month per TLS subscriber, and will be reduced to $2.00 in 2013 and eliminated at

[35] *See Order*, Appendix C.
[36] *See Order* at ¶ 203.

the beginning of 2014.[37]

3. Marketing & Outreach

Aegis will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Aegis will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:[38] (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. Aegis' website and printed collateral will explain the documentation necessary for enrollment, and the details of Aegis' plans. Such collateral and website information, as well as its application, will make clear that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.[39] For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Aegis will include the URL link for its website where disclosures will be listed. Additionally, Aegis will disclose the company name under which it does business.[40]

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[37] *See Order* at ¶ 234.
[38] See Exhibit B for a sample advertisement. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. *See Order* at ¶ 275.
[39] *See Order* at ¶ 275.
[40] *See id.*

4. Audits

The *Order* requires ETCs that draw $5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, to hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess the ETC's overall compliance with the program's requirements.[41] Aegis will comply with this requirement if and when it is approved, including applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.[42]

D. De-Enrollment

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

Ineligibility. Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).[43]

If a customer does not respond to the Company's annual verification survey within 30 days, or if Aegis has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Aegis will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that

[41] *See Order* at ¶ 291.
[42] *See Order* at ¶ 294. As of the date of filing of this Compliance Plan, this audit requirement has not been approved pursuant to the Paperwork Reduction Act.
[43] *See Order* at ¶ 122.

his or her Lifeline service should not be terminated.[44] Similarly, Aegis will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.[45]

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,[46] Aegis will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

E. Additional Rule Amendments

1. Terms and Conditions of Service

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

2. Reporting Requirements

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

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[44] *See id*. In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.
[45] *See Order* at ¶ 89.
[46] *See Order* at ¶ 214-16.

including minutes of use and/or toll calls.[47]

3. Reimbursement from USAC

In seeking reimbursement for Lifeline, Aegis will comply with the requirements of C.F.R § 54.407, as revised by the *Order*.[48] Aegis will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,[49] and the Company will seek reimbursement for actual lines served, not projected lines.[50]

4. Section 54.202 Certifications

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

IV. COMPANY INFORMATION

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

A. Names and Identifiers

Aegis does not have any holding companies, operating companies, or affiliates. The company provides wireline services under Aegis Telecom, Inc. and wireless services under the d/b/a Off The Hook Telecom.

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[47] *See Order* at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person.
[48] *See Order* page 221.
[49] *See Order* at ¶ 128.
[50] *See Order* at ¶ 302.

B. Financial and Technical Capability

Aegis is financially and technically capable of providing Lifeline-supported services.[51] Aegis currently provides wireless services in Missouri and offers service to both Lifeline and non-Lifeline customers. Aegis has not been subject to enforcement action or ETC revocation proceedings in any state. Aegis is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. Aegis has a commitment from TSB to assist with operational costs via a promissory note until the Company is self-reliant Furthermore, the senior management of Aegis has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.[52] Aegis will also rely upon the managerial and technical expertise of TSB, which has seven years of experience in building processes, teams and programs to support telecommunications carriers.[53]

C. Lifeline Offering

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

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[51] *See Order* at ¶ 387.
[52] See Exhibit C for key management resumes.
[53] The Company has contracted with TSB for development and management consultation. For more information on TSB, visit www.telecomservicebureau.com.

V. CONCLUSION

Aegis submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, Aegis respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Aegis Telecom, Inc.

/s/ Lance J.M. Steinhart

_____

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

Its Counsel

Dated June 29, 2012

Exhibit A

Sample Lifeline Certification Form

Wireline Lifeline Service Application and Certification

Return With Proof

AL

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Aegis Telecom's (the "Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. 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. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

❑ **By checking this box, I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

Customer Application Information:

First Name Middle Initial	Last Name	Date of Birth (MM/DD/YY)
		/ /

Residential Address w/ street name & Apt Number **(PO Box cannot be accepted)**	**City / State / Zip Code**
Billing Address (if different from Residential Address) **(P.O. Box IS sufficient)**	**City / State / Zip Code**
❑ Residential Address is **Permanent** **(Must Choose One)** ❑ Residential Address is **Temporary**	❑ Service Is New (Choose One) ❑ Service Is Conversion

Social Security Number or Tribal Number	Home Telephone / Contact Number	Email Address
- -	( ) -	

Would you like to receive texts or emails from our company about new service offerings or promotions?

❑ **Yes** ☐ **No** This information will be for company use only, & will not be shared with a third party company or organization.

ELIGIBILITY REQUIREMENTS:

Number of persons in Household _____

Do you or any member of your household currently receive Lifeline assistance at the above address? ☐ **YES** ☐ **NO**

I hereby certify that I currently participate in at least one the following public assistance programs (Check One):

- ❑ Supplemental Nutrition Assistance Program (SNAP)
- ❑ Federal Public Housing Assistance Section 8 (FPHA)
- ❑ Medicaid (not Medicare)
- ❑ Supplemental Security Income (SSI)
- ❑ Temporary Assistance for Needy Families (TANF)
- ❑ Low Income Home Energy Assistance Program (LIHEAP)
- ❑ Income at or below 135% of Federal Poverty Guideline
- ❑ Bureau of Indian Affairs (BIA) General Assistance
- ❑ Tribally Administered TANF (TATNF)
- ❑ Food Distribution Program on Indian Reservations (FDPIR)
- ❑ Head Start (income-eligible only) (Tribal)
- ❑ National School Lunch Program's free lunch programs

If the beneficiary of the above program is different from the applicant, please state the name of person receiving the benefit: _____

❑ I hereby certify that the recipient of the above government program lives in my household and does not receive Lifeline benefits from any other carrier.

ADDITIONAL CERTIFICATIONS:

The Eligible Telecommunications Carrier is **Aegis Telecom, Inc.**

PO Box 831627 Ocala, FL 34483-1627 Customer Service: 877-476-3440 Fax: 877-433-2161

Tribal eligibility:

- ❑ I hereby certify that I reside on Federally-recognized Tribal lands.

Multiple households sharing and 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 additional form.

Authorizations:

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

I hereby certify, under penalty of perjury, that:

- ❑ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- ❑ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- ❑ I am not listed as a dependent on another person's tax return (unless over the age of 60)
- ❑ The address listed below is my primary residence, not a second home or business
- ❑ If I move to a new address, I will provide that new address to the Company within 30 days
- ❑ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- ❑ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- ❑ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- ❑ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature:	**Date:**

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information for at least three months' time.

Applicant Account Number	Rep/Agent Signature

Expiration Date of Proof Documents: _____/_____/_____

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meet income qualifying standards) (Tribal)

List B - Choose 1:

- ☐ Program participation card/document (Last 4 Digits _____)
- ☐ Prior year's statement of benefits (Last 4 Digits _____)
- ☐ Notice letter of participation (Last 4 Digits _____)
- ☐ Other official document evidencing participation:

Type: _____ Last 4 Digits _____

Exhibit B

Sample Advertisement

Stay Connected with FREE Local & Long Distance

AEGIS TELECOM, INC.

Receive 1 month of **FREE** Phone Service with a $25.00 Activation and Unlimited Local & Long distance service! No Deposit, No Credit Check. Additional plans are available. You are eligible if you participate in any of the following Public Assistance Programs:

- **Supplemental Nutrition Assistance Program (SNAP)**
- **Medicaid (not Medicare)**
- **Supplemental Security Income (SSI)**
- **Federal Public Housing (FPHA/Sect. 8)**
- **Temporary Assistance for Needy Families (TANF)**
- **Low Income Home Energy Assistance Program (LIHEAP)**
- **National School Lunch Program's free lunch programs**
- **Income at or below 135% of Federal Poverty Guidelines**
- **Proof of income or program participation is required**

Lifeline Service is limited to one benefit per household. You may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both.

Lifeline is a government assistance program that is only available for one phone per household by law. 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. Only eligible consumers may enroll in the program.

Service Plan Prices

Basic Service . . . . . $44.25 (Plus Tax)

Premier Package . . . . . $49.25 (Plus Tax)

Includes caller ID with name, call waiting and call waiting ID

Complete Package. . . . . $54.25 (Plus Tax)
Includes caller ID with name, call waiting, call waiting ID, *69, 3-way & call forwarding

Lifeline Basic Service . . . . . .$35.00 (Plus Tax)

Lifeline Premier Package . . . . . .$40.00 (Plus Tax)
Includes caller ID with name, call waiting and caller ID

Lifeline Complete Package . . . . . .$45.00 (Plus Tax)
Includes caller ID with name, call waiting, call waiting ID, *69, 3-way & call forwarding

Lifeline service is non-transferable.

Exhibit C

Key Management Resumes

Robert N. Clark
18 Hemlock Radial Loop
Ocala, FL 34480
(352) 425-8593

Strengths

- Project Management Team Building & Leadership
- Staffing & Budgeting Planning & Scheduling
- Resource Planning & Allocation Multi-Project Administration
- Process Improvement
- Call Center Management, Telephony, Computer Telephony Integration
- Service Delivery Systems and Quality Management
- Skilled in structured cabling to EIA/TIA industry standards
- Experienced in telephone and computer systems integration.
- Excellent troubleshooting and problem isolation in various types of networks.
- Experienced in setup and maintaining small business networks
- Knowledgeable with electronics testing equipment

Accomplishments

- **Samsung Certifications:** iDCS Basic Plus, iDCS Basic, iDCS Q-Sig, SPNet, ITP, OfficeServ 7000 series, OfficeServ Applications, OfficeServ Wireless, SVMi-E
- **Toshiba Certifications:** TCTS, TCTE-IP, Strategy(DOS,SES), Toshiba Video Communications Systems
- **Leviton Certifications:** Guide to Electrical Theory, Wiring Installer 1, Wiring Installer 2, Wiring Installer 3
- **CompTIA Certifications:** Net+

Experience

Owner

Aegis Telecom, Inc. dba Off the Hook Telecom July 2009 – Present

- Manage overall business development
- Manage growth and development of applications pending across multiple states
- Stay up to day on new compliance procedures and requirements
- Provide financial backing and maintain payables and receivables
- Maintain vendor contracts and work hand in hand with management company

General Manager

High Tech Communications, Inc. November 2009 - Present

Ocala, FL 34480

- Managed overall business process for the Company owners.
- Negotiate with vendors, outsourcers, and contractors to secure products and services

- Conduct research and make recommendations on network and telecommunications products, services, protocols, and standards in support of procurement and development efforts.
- Validate accuracy of invoices, manage monthly budget reconciliation, assign network and telecom costs to appropriate accounting units.
- Establish and maintain regular written and in-person communications with the organization's executives, decision-makers, stakeholders, department heads, and end users regarding pertinent network and telecom activities.
- Provide visible leadership on technology strategy and implementation, including input into the development of roadmaps for long range technical plans.

Technician December 2008-November 2009

Raptor Technologies

Knoxville, TN

- Handled installations and troubleshooting of Toshiba and ESI voice networks.
- Planned and installed the structured cabling for these projects

Technician September 2007-November 2008

Epic Technologies

Cookeville, TN

- Handled installations and troubleshooting of Samsung, Mitel, Vodavi, Nurse Call, Door Access, Paging, and Data networks.
- Planned and installed the structured cabling for these projects
- Verified Samsung sales proposals

Service Manager October 2004-September 2007

High Tech Communications

Ocala, FL

- Handled installations and troubleshooting of Samsung Products.
- Installed and maintain computer networks (Server 2000, SBS 2003) for clients.
- Handled purchasing and receiving of computer and phone equipment.
- Office Manager including daily tasks of lead acquisition and office personnel.
- Director of sales to include implementing estimates and acquisition.
- Process management and project planning.

Owner November 1999-October 2004

Ocala Computer Consulting, Inc.

Ocala, FL

- Installed and maintain clients' computer networks (NT Server, Server 2000).
- Handled purchasing and receiving of equipment.
- Presented proposals for network design and implementation.
- Developed business relationships with companies in the same industry.
- Developed a suite of Historical Picture and Video CD-ROM's.
- Developed basic business card web sites

Computer Technician June 1999-November 1999

Auto Insurance World.

Ocala, FL

- Managed the computer networks (Peer-to-Peer, and Server 2000) for five locations in Central Florida.
- Included troubleshooting various software programs.
- Installation of new computer systems and equipment.
- Troubleshoot and isolate network problem that arose.
- Recommended various solutions to enhance the performance of the networks.

Education

Helena, MT

Helena College of Technology 1998

A.S. Electronics Engineering

References Available on request.

Exhibit D

Proposed Lifeline Rate Plans

Alabama Rate Sheet

Non-Lifeline Plan Prices:

BASIC SERVICE	**$44.25 (plus tax)**
PREMIER PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, AND CALL WAITING ID	**$49.25 (plus tax)**
COMPLETE PACKAGE)INCLUDES CALLER ID W/NAME, CALL WAITING, CALLER WAITING ID, *69, 3-WAY, & CALL FORWARDING	**$54.25 (plus tax)**

Lifeline Plan Prices:

LIFELINE BASIC SERVICE	**$35.00 (plus tax)**
LIFELINE PREMIER PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, AND CALL WAITING ID	**$40.00 (plus tax)**
LIFELINE COMPLETE PACKAGE INCLUDES CALLER ID W/NAME, CALL WAITING, CALLER WAITING ID, *69, 3-WAY, & CALL FORWARDING	**$45.00 (plus tax)**

Alabama Lifeline Discount:

Connection Fee: $25.00
Reconnection Fee: $25.00
Restore Fee: $15.00
Extension Fee: $5.00
The monthly Lifeline discount for all eligible customers is $9.25 (As of August 1st)

Alabama TLS Charges:

TLS Monthly Recurring Charge (MRC) is $2.99
TLS Non-Recurring Charge (NRC) is $3.49
(*TLS will be incrementally decreased until it is eliminated in 2014)

Alabama ILEC Charges:

AT&T Toll Block MRC: $3.22
AT&T Toll Block NRC: $0.00

Additional Charges:

Non Published Number: $5.00
Call Waiting: $5.00
Call Forwarding: $5.00
Return Call (*69): $5.00
Three Way Calling: $5.00
Caller ID: $10.00
Voice Mail: $10.00
Internet: $14.95 (Dial Up)