

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

In the Matter of

Lifeline and Link Up Reform and
Modernization

WC Docket No. 11-42

APPLICATION OF NEXUS COMMUNICATIONS, INC.

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Nexus Communications, Inc. (“Nexus”) respectfully submits the following application to participate in the Commission’s broadband adoption pilot program for low-income consumers.

I. INFORMATION REQUESTED IN THE PUBLIC NOTICE

A. Company Information

Nexus (FRN 0008813230) is a national wireline and Commercial Mobile Radio Services (“CMRS”) wireless telecommunications service provider that focuses on providing telephone services to low-income consumers. Nexus is a privately-held company and provides wireless services under the d/b/a name ReachOut Wireless. It is organized under Ohio law and headquartered in Columbus, Ohio.¹

Nexus became a competitive local exchange carrier in 2001, and later began to focus on providing service to low-income consumers. Nexus has been serving the low-income community since 2006 when it received its first ETC designation. Since that time, it has been

¹ Nexus has no holding company. Nexus owns 100% Telecom Services, Inc. but that company does not provide telecommunications services. Nexus provides wireline services under the names TSI and TSI Telephone Company.

designated as an ETC in a total of 26 states.² In 2009, Nexus began to offer wireless services in recognition of the greater utility and benefits of mobility in the communities it serves. Nexus' wireless offerings have been very successful with low-income consumers and the company now provides prepaid wireless ETC service to a large and growing number of Lifeline subscribers in the following states: Arkansas, California, Georgia, Iowa, Illinois, Kansas, Louisiana, Maine, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, Ohio, Rhode Island, West Virginia and Wisconsin.³

Nexus, therefore, has years of experience in providing wireless services focused on the low-income population, and over these years, has developed deep expertise in understanding the different needs and expectations of low-income consumers. Nexus aims to serve not only the upper echelon of the Lifeline consumer bracket, but also consumers who fall well below the eligibility requirements who are often not targeted by other Lifeline service providers. Its subscriber service, sales and technical support teams are specially trained in methods and practices attuned to communicate effectively with low-income consumers. For Nexus, it is the norm, rather than the exception, to expect that a potential subscriber may not be familiar with technology, be fluent in English or Spanish, or even be able to read.

Nexus' management has many years of experience in the telecommunications industry and has considerable experience operating as both a wireline and wireless Lifeline-only ETC. With Nexus' extensive experience focusing on providing high quality telecommunications services to low-income and credit challenged consumers, Nexus was one of the first competitive

² Nexus has been designated an ETC in the following states: Alabama, Arkansas, California, Florida, Georgia, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, North Carolina, Ohio, Oklahoma, Rhode Island, South Carolina, Tennessee, Texas, West Virginia and Wisconsin.

³ Nexus serves the following wireless study area codes: AR 409006; CA 549010; GA 229012; IA 359129; IL 349019; KS 419017; LA 279020; MD 189007; ME 109009; MI 319020; MO 429009; MS 289027; NJ 169002; NV 559009; OH 309006; RI 589004; WI 339026; and WV 209014.

ETCs in 2006. Nexus' President, Steven Fenker, has over a twenty-five years of experience in managing all aspects of the provision of telecommunications services, both wireline and wireless. His experience includes managing the provision of dial-up Internet access services to low-income consumers. Also part of the senior Nexus' management team is Mark Deek, who has 15 years of experience in the telecommunications industry, with particular expertise in intercarrier relations, and subscriber care and billing database management.

B. Description of Proposed Project

1. Proposed Service Area

Nexus proposes to provide the pilot services throughout its service area in Ohio, as well as Detroit, Las Vegas and Des Moines, and additional cities in its wireless territory. In all pilot areas, Nexus will partner with Connected Nation in order to provide pilot program subscribers (except those in the Control Group) with digital literacy training. Connected Nation will provide *no-cost, live* digital literary training courses throughout the state of Ohio, as well as in Detroit, Michigan; Las Vegas, Nevada; and Des Moines, Iowa. Nexus will track urban and rural subscribers in Ohio separately in order to provide additional granular information regarding any detectable differences in the results in these markets.

In order to provide the Commission with more test data, Nexus also intends to offer pilot service in other markets in its wireless service territory without live literary training. Nexus will direct half of these subscribers to Connected Nation's on-line literacy course, and not offer any literacy training to the other half. The proposed plan will offer such service in both urban and rural areas in other parts of Nexus' 18-state wireless service area. Nexus would be happy to work with the Commission to focus on certain of these markets if the Commission has any preference for purposes of securing greater geographic diversity in its overall pilot program.

Nexus intends to specifically focus on low-income neighborhoods, which is where its existing subscriber base is already concentrated. For example, in Ohio, Nexus will focus on low-income neighborhoods located in Mahoning County, Trumbull County, Cuyahoga County, Lorain County, Summit County, Lucas County, Hamilton County, and Franklin County. Ohio trails the nation in broadband adoption, and only 39% of low-income Ohioans subscribe to broadband.⁴ Ohio therefore is an important and fertile ground for the Commission's campaign to boost the adoption of broadband among low-income consumers.

2. Description of Technology

Nexus proposes that consumers participating in its pilot will access the wireless broadband service on a personal computer, laptop, tablet or similar devices. These devices can be more conducive than mobile telephone handsets to word processing applications that are used for school work, job searches and other important functions. At the same time, Nexus firmly believes that it is important to offer Lifeline subscribers the ability to move their service easily and quickly, particularly as they travel from home to school, job to library, etc., and as they change residences, which happens much more frequently than for higher-income consumers. Nexus has therefore chosen to focus its pilot application on mobile CMRS bandwidth directed to a wireless aircard that can be utilized by devices such as laptops or desktop computers.

3. Proposed Broadband Speeds

Nexus' pilot program CMRS service will use a 3G (1xEVDO Rev A) technology that enables average download speeds of 500 kbps – 1.4 Mbps and average upload speeds of 500 – 800 kbps. 3G speeds adequately support typical online educational, health and communications

⁴ See Connected Nation 2011 Consumer Broadband Adoption Trends Residential Survey, available at <http://connectohio.org/survey-results/residential>.

resources and applications. Nexus believes that many consumers find the advantages of mobility to be more important than the faster speeds that are available from fixed wireline broadband services. Moreover, 4G access is limited on a resale basis and is not available in all parts of the country. For purposes of being able to offer consistent pricing and service across the entire field experiment area, therefore, Nexus proposes to use 3G spectrum for the pilot, although it is actively exploring options that would later enable Nexus to offer 4G services. If Nexus is able to secure a 4G offering prior to the start of the pilot, it would like to be able to work with the Commission to amend the application to offer 4G options as part of the pilot.

4. Proposed Rates and Subsidies

Nexus plans to offer the following 30-day monthly rates in the pilot program:

Plan	Data Allowance	Non-discounted Rates (Control Group) ⁵	Discounted Rates (Test Group I--\$10.00 Pilot Subsidy)	Discounted Rates (Test Group II--\$15.00 Pilot Subsidy)
Basic	200 MB	\$14.99	\$5.00	\$0.00 ⁶
Intermediate	500 MB	\$19.99	\$10.00	\$5.00
Medium	1 GB	\$29.99	\$20.00	\$15.00
Large	2 GB	\$39.99	\$30.00	\$25.00

Nexus does not propose any discounts that decline over time, given that all pilot-subsidy discounts expire after twelve months. Nevertheless, it will be able to test the effect on retention after a price increase when the subsidy period ends. Nexus is concerned that subscribers would be discouraged by two separate price increases during the course of the first year of service and believe that even the complexity involved with explaining this to low-income consumers would

⁵ For purposes of its field experiment, Nexus wanted its Control Group to receive non-discounted market-based prices. However, it also did not want to contaminate its control group data with information from subscribers who were not part of the pilot program, were not eligible for Lifeline, or who received pilot offers but could not certify that no one in their household already had broadband. Nexus therefore propose that its Control Group will receive offers, and if they subscribe, service, at rates one cent less than the standard commercial price (i.e., \$14.99 instead of \$15) so that it can better track Control Group data uncontaminated by data from subscribers who were not part of the pilot. For ease of accounting, Nexus has requested a subsidy level that compensates it for this one cent difference, so that the requested subsidy is an even \$10 or \$15 rather than \$9.99 or \$14.99.

⁶ Nexus recognizes that the Commission has stated a preference against no-cost plans to guard against “adoption” by eligible consumers who may not be interested in actually using the service. The company does not believe that to be a material risk in its case because a new subscriber must also purchase a refurbished aircard for \$50.00. In addition, Nexus believes that it would be useful for field experiment purposes to be able to supply the Commission with data on the number of consumers who choose this plan and also whether their usage differed from Control Group subscribers who paid a recurring charge for the same data plan. This would enable the Commission to better test its hypothesis that a material percentage of Lifeline subscribers receiving free service would not actually use it.

negatively affect the pilot. Also, a declining subsidy would be even more confusing for subscribers who join well after the start of the program.

Nexus proposes multiple usage options in order to be able to provide more data to the Commission from its field experiment. Nexus is mindful of the Commission's requirement that pilot participants offer usage options comparable to those available today in urban areas, and that many broadband services (particularly fixed wireline services) are still sold with unlimited usage or usage limits that are higher than the proposed lower usage plans. Nexus proposes a variety of lower-usage options, however, so that it may provide further data on usage options to the Commission.

As subscribers approach their monthly data limit, Nexus will provide notices to warn them that they are nearing their limits (including via text to those Nexus' existing wireless subscribers) and will also provide them with access to an online tool in which they can check their current usage. Once a subscriber uses all of his or her allotted usage for a month, the broadband service will stop working until the first day of the next month of service. Alternatively, an affected subscriber could contact Nexus to pay for a higher usage plan and immediately restore service. Nexus' service is pre-paid, which it has found is the model that works best for low-income consumers seeking to control their family budgets. Additional post-paid usage charges would expose the company to additional risk and expose subscribers to the potential unwanted bill shock for usage charges that they may not be able to afford. By providing the service via a prepaid format, the Lifeline subscriber never incurs unexpected charges for services, nor incurs liability for overages.

Any free Wi-Fi services may also provide additional benefits to pilot participants who utilize Wi-Fi enabled equipment. By using a laptop equipped with both Wi-Fi and wireless

broadband capability, subscribers will be able to utilize free Wi-Fi services that are available in an increasing number of locations throughout their community, without consuming their data allotment.⁷ Nexus will provide instructions to subscribers to make them aware of the benefits of this opportunity.

5. Non-recurring Fees

Nexus' broadband pilot will not assess any non-recurring fee. Consumers who do not currently subscribe to broadband may be deterred by high up-front fees on top of equipment costs, so Nexus has elected to try to recover the company's initiation and activation costs through ongoing service rates, rather than through non-recurring charges.

6. Focus on Unserved Consumers

Nexus' offer will make clear that eligibility for service is conditioned on the subscriber's certification that no one in the subscriber's household currently subscribes to a broadband service, including those subscribers in the Control Group in order to preserve consistency of the field experiment. For all subscribers, Nexus will utilize its existing certification procedures to otherwise qualify the applicant to receive the pilot service, in order to provide an auditable record and provide the Commission with greater assurance of the accuracy of the field experiment data.

Nexus' application partner Connected Nation uses grassroots techniques through its *Connected* community effort to pinpoint underserved areas and create strategic technology plans for these locations. *Connected* programming helps communities to effectively and efficiently leverage technology by identifying best technology practices and how to acquire

⁷ This function would be available only if the subscriber used a mobile device such as a laptop that has a Wi-Fi capability.

such technology. Connected Nation will support Nexus with metrics from its programs that will help Nexus determine where to target its broadband solicitations in communities that are most likely to have higher levels of low-income residents who do not currently subscribe to broadband.

7. Proposed Funding and Subscriber Projections

Nexus plans to focus on its existing eligible Lifeline telephone service subscriber base for solicitations, for three reasons: (1) advertising to new subscribers through an outreach campaign would be problematic because Nexus will offer different rates to similarly situated subscribers in the same market; (2) the use of existing subscriber base assures that the offers are only sent to Lifeline-eligible subscribers and eases the administration of verification of eligibility for the pilot, for both Nexus and the subscribers; and (3) the use of existing subscribers enables Nexus to perform a more controlled field experiment in which Nexus can precisely and randomly select Lifeline-eligible low-income consumers in the test markets. However, as noted below, Nexus will also make pilot service available to new subscribers located in low-income neighborhoods by conducting in-person direct action outreach through “Lab-in-a-Van” vehicles, as is described in more detail below in Section C.

Nexus’ proposal assumes that it will enroll 8,000 subscribers in Group I and enroll 8,000 subscribers in Group II. It will begin offering service immediately and will continue to solicit potential subscribers until these allotments had been exhausted. Nexus is unable to predict adoption take-rates of the percentage of people that will subscribe, so its plan is to measure the number of solicitations required to fulfill these allotments. Nexus will also make an equal number of offers to Lifeline-eligible subscribers at its non-discounted Control Group rates.

For example, at the initial launch, Nexus will send solicitations to 120,000 subscribers: 40,000 at Group I rates, 40,000 at Group II rates, and 40,000 at Control Group rates. The company does not expect one-fourth acceptance so it does not anticipate that this will exhaust the allotment for either group. It would send a second solicitation to all non-responsive initial recipients. After approximately one month, it would send new solicitations to an additional number of potential eligible subscribers Group I and Group II. Nexus will calculate the number of solicitations based upon the percentage take-rate from the first month. For example, if it had enrolled 4,000 Group I subscribers and 6,000 Group II subscribers, it might send 40,000 additional Group I offers (expected to result in another 4,000 subscribers) and 13,333 Group II offers (expected to result in another 2,000 subscribers), and would then send another 40,000 Control Group offers to match the size of the Group I pool.

Nexus will not materially oversubscribe a Group, though it does expect that service to some subscribers would be cancelled prior to the end of the pilot, either at the subscriber's request or as a result of non-payment. Thus, it expects that the 8,000 discounted slots will be subscribed for an average of 10 months during the pilot's subsidy period. It can re-fill a slot of a canceled subscriber such that it might have more than 16,000 discounted subscribers during the life of the project without exceeding the program budget.

The requested budget for the service subsidy is therefore \$2,000,000, which is based upon 8,000 subscribers at \$10 per month times 10 months (\$800,000) and 8,000 subscribers at \$15 per month times 10 months (\$1,200,000). However, these numbers can easily be scaled up or down to a reasonable extent based upon the Commission's preference and amount of available funds.

Nexus will then measure how many offers it had to send in order to fully subscribe each Group. It will calculate the Control Group adoption rate based upon the number of subscribers subscribed divided by the number of Control Group offers. More granular analysis of the usage level selected by each subscriber would be appropriate to consider different shades of success, although at the outset, Nexus expects that more subscribers in Group II, because of lower rates, would choose higher usage plans.

Nexus understands that preserving scarce universal service fund USF resources is vitally important and that the Pilot Program has a limited budget. In the event that it oversubscribes subscribers to a discount plan, Nexus agrees not to seek reimbursement for subsidies beyond the funds allocated by the Commission in its award.

In each pilot market, Nexus will use the same proportion of offers for each Test Group (including the Control Group), so that the calculations set forth above can be made for each market. In Ohio, Detroit, Las Vegas, and Des Moines, Nexus will direct subscribers to the live training programs of Nexus' digital literacy partner, Connected Nation. For the Ohio pilot, Nexus will partner with Connect Ohio, a subsidiary of Connected Nation. Nexus' pilot participants will have access to a program created by Connect Ohio entitled Every Citizen Online ("ECO"), which is designed to stimulate broadband adoption in Ohio by building awareness, developing strategic partnerships, and conducting training sessions at libraries, community colleges, and other anchor institutions throughout the state. The ECO project entails an extensive statewide advertising campaign to raise awareness about training opportunities and deploys trainers statewide for instruction in the use and maintenance of computer components, Internet use, and practical applications of broadband access. Since the beginning of 2011, the program has trained 22,000 Ohioans in basic computer skills, with 87% of trainees expressing an

interest in adopting broadband service within a year or less. The project is on target to train more than 200,000 residents over the life of the three-year project, providing approximately 1.1 million hours of training.

In Detroit, Las Vegas and Des Moines, Nexus will direct half of the pilot subscribers to Connected Nation's online digital literacy program, and for the other half it will not identify any training opportunities to subscribers. This diversity of approaches will enable it to provide the Commission with data about the effect of live and online literacy training options on adoption, retention, and usage, (Nexus will collect data on actual usage by each category in Nexus' field experiment). It also will separately compute actual data usage by subscribers who received training versus those who did not in order to try to determine whether such training led to increased usage of the broadband service.

Nexus will use the last two digits of the subscriber's account number to randomly determine whether to send him or her pilot applications and if so, which price offer he or she will receive. It will disperse offers throughout the geographic areas subject to the pilot program.

Nexus expects that it will receive some unsolicited requests for service at the pilot-subsidized discounted rates based upon word of mouth from other subscribers. To preserve the validity of the data, Nexus will not accept unsolicited requests for service into the pilot program. As noted above, the company will have a separate, undiscounted price plan available to non-participants that will be tracked separately from the Control Group.

8. Marketing

Because Nexus will be offering different rates to different people, Nexus will rely primarily on direct marketing texts to existing subscribers. The initial text will read:

IMPORTANT MESSAGE ReachOut Wireless, through the Federal Lifeline program, is now offering wireless broadband! You may receive up to 2 Gigs a month of 3G wireless broadband. If you qualify, you may receive up to \$15.00 off regular rates. Call 1-866-XXX-XXXX immediately for specific packages and rates!

Nexus will provide marketing in select other languages where it has information about the language preference of the subscriber or the local community. In select low-income neighborhoods in Ohio, Nexus will also advertise the service through the Lab-in-a-Van program described below.

9. Customer Service Support

Subscribers purchasing refurbished computers through the Connected Nation program described below will be eligible for a free allotment of telephone-based professional computer support. Additionally, Nexus will select members of the company's existing subscriber service team to be trained in supporting inbound subscriber technical and other support for the pilot program broadband services and related computer issues. Nexus has over the years gained experience dealing with its low-income wireline subscribers who have contacted Nexus in connection with dial-up internet access services, seeking answers to basic tech support questions and issues.

C. Nexus and Connected Nation Have Partnered to Implement a Comprehensive Broadband Adoption Strategy for the Pilot Program

1. Digital Literacy Training

Nexus has partnered with Connected Nation and its subsidiaries and partners in this pilot application to provide digital literacy training to its pilot program broadband subscribers. Connected Nation is a broadband adoption pioneer with more than ten years experience working with hundreds of anchor institutions, community leaders, states, local governments, and citizens across the country to expand the reach, adoption, and use of broadband technology. Digital

literacy and technology outreach projects have been at the heart of Connected Nation's mission since its founding. From the introductory "Computers 4 Kids" program it inaugurated in Kentucky and Tennessee in 2004, Connected Nation has grown to become a nationally-recognized leader in broadband adoption and digital literacy as a recipient of NTIA grants, a partner of the Bill and Melinda Gates Foundation, and through relationships with community anchor institutions. Connected Nation has built digital literacy programs that integrate connectivity, devices, and training from the ground up, and it has targeted its initiatives on the basis of sound empirical research.

The centerpiece of the Nexus-Connected Nation partnership for this pilot project will be located in Nexus' home state of Ohio. Connected Nation's Ohio subsidiary Connect Ohio has already provided live, six-hour digital literacy (computer and broadband skills) courses to more than 22,000 Ohioans through its Every Citizen Online program. Every Citizen Online is a public-private partnership that supports the offering of free computer and broadband training classes in more than 285 library, community college, workforce development, and community center and other locations across the state of Ohio. Every new Nexus pilot program subscriber in Ohio will be invited to enroll in these training programs at locations near his or her home.⁸ After completing the basic training in computer basics, Internet fundamentals, and applied Internet use, students can move into a wide array of topics from jobs to education, healthcare, or further computer knowledge.

⁸ Depending on the timing of the Commission's pilot program, it is possible that Connect Ohio's funding for its training programs could run out in the second half of 2013 prior to the very end of the pilot program. Because Nexus expects most of its pilot program subscribers to be subscribed within the first part of 2013, the company does not anticipate a significant problem. However, in such event, the company would turn that shortfall into a positive by providing the Commission with additional field data regarding any differences in adoption, retention and usage of Ohio subscribers who were not offered training with those that were.

In addition, Nexus itself will be a sub-recipient of Connect Ohio's Broadband Technology Opportunities Program ("BTOP") grant. Connect Ohio will provide training to Nexus personnel and to other persons recruited by Nexus to launch Nexus-operated mobile training facilities. These Lab-in-a-Van training facilities (modeled after Connect Ohio's successful Lab-in-a-Box® program) will be able to bring training centers directly into the neighborhoods of Ohio's poorest communities. Through Lab-in-a-Van, Nexus will also offer pilot broadband service to new subscribers, as an exception to its general practice in the pilot of targeting existing subscribers for the pilot. These consumers could subscribe to Nexus' broadband pilot services regardless of whether they subscribe to Nexus' voice services. It will not be able to offer Control Group and Test Groups I and II pricing at the same time to new subscribers, so it will offer one of these three rate plans exclusively to everyone in contact with the van on that day's deployment. The company would then offer each of the other rate plans on different days.

Lab-in-a-Van will particularly target neighborhoods that Connect Ohio has identified as having low broadband adoption rates. Nexus will also seek to train, as trainers, members of particular immigrant communities in Ohio. Nexus believes that it can improve and enhance broadband adoption and literacy in some low-income ethnic communities by providing training, enabling these members to conduct further training in their specific communities. The company will perform sales and eligibility functions with the van and will offer on-the-spot training, or offer the new subscriber additional training at a later time.

2. Discounted Hardware

Nexus has partnered with Connected Nation to make refurbished desktop and laptop computers available to its pilot subscribers at highly-discounted prices, including a 90-day

warranty and an allotment of free professional telephone-based subscriber computer support. Connected Nation has a long, successful history in providing discounted refurbished computers through its Computers 4 Kids program. Subscribers will have three options:⁹

- **Basic Desktop Internet Access Computer for \$119:** Pentium 4 Processor, 1GB RAM; 40GB Hard Drive, DVD Drive, Windows XP Operating System Software, 15" Display Monitor, cable, keyboard, mouse.
- **Basic Portable Internet Access Laptop for \$189:** Pentium 4 Processor, 1GB RAM; 40GB Hard Drive, DVD Drive, Windows XP Operating System Software, wireless modem.
- **Premium Portable Internet Access Computer for \$229:** Dual Core Processor, 2GB Ram; 80GB HD, DVD, Windows XP Operating System Software, wireless modem.

Nexus also has direct relationships with refurbishers and may offer additional options to participants. While subscribers will also be permitted to use other computers and devices, Nexus wants to provide them with these discounted options as a good alternative to second-hand computers inherited from friends or purchased at garage sales. Old computers that have not been professionally refurbished tend to have insufficient memory, viruses or malware, old versions of software, and other problems.

Finally, subscribers will need aircards provided by Nexus to use the broadband service. Nexus plans to provide pilot participants with discounted refurbished aircards at a price of \$50.00 per unit plus shipping.

D. Additional Qualifications of Connected Nation

Connected Nation is a national 501(c)(3) non-profit organization committed to bringing the benefits of broadband to the all Americans, with a belief that the widespread access, adoption, and use of broadband-enabled technology has the power to improve lives. Connected

⁹ A shipping charge of \$12 also applies to each computer.

Nation has pioneered broadband research, community technology planning and demand stimulation for over a decade. More recently, Connected Nation has partnered with ten states and one U.S. territory to launch successful broadband-focused initiatives under the State Broadband Initiative (“SBI”) grant program. Connected Nation’s state partners are: Texas, Alaska, Nevada, Kansas, Iowa, Minnesota, Michigan, Ohio, Tennessee, South Carolina, Florida, and the territory of Puerto Rico.

E. Design and Implementation Plan For Field Experiment

1. Project Design

Nexus’ field experiment will divide the more than 100,000-300,000 or so subscribers (the number will depend on adoption rates) who will receive solicitations into seven geographic Test Service Areas and, within each, into one of three Test Groups (Control Group and Test Groups I and II). Each group will be able to choose from one of four usage plans. As detailed in subsection 2 below, the project will test adoption hypotheses regarding the relative success of each of these Groups by the type of digital literacy training offered and received, whether the new subscriber needed (and therefore elected) a discounted computer, and the varying Lifeline discounts offered (or lack thereof).

2. Data Sets to be Provided to the Commission

To inform the Commission of causal impact of the variations in broadband service adoption, usage, and training, Nexus will collect and prepare separate data sets for each of the following Test Service Areas:

- Ohio Urban¹⁰
- Ohio Rural
- Ohio Lab-in-a-Van¹¹

¹⁰ Nexus will determine whether a subscriber is urban or rural based upon the U.S. Census Bureau’s definitions as applied to the subscriber’s billing address.

- Detroit
- Las Vegas
- Des Moines
- Other Urban
- Other Rural

For each Test Service Area, Nexus will provide data sets for:

1. Number of Solicitations Sent
 - a. Control Group Pricing/Test Group I Pricing/Test Group II Pricing¹²
2. Ordered Service
 - a. Control Group/Test Group I/Test Group II
 - i. Basic/Intermediate/Medium/Large¹³
 - b. Received Solicitation but Ineligible; Ordered Commercial Service¹⁴
 - c. Offered Live Training
 - i. Attended Training
 - d. Offered Online Training
 - i. Started/Completed Online Training
3. Ordered Discounted Computer through Nexus/Connected Nation
 - a. Control Group /Test Group I /Test Group II

¹¹ There are eight “Test Service Areas,” but in some cases Nexus refers to the seven “geographic” Test Service Areas which excludes the Lab-in-the-Van part of the study.

¹² For each of the seven geographic areas (which excludes the Lab-in-a-Van data), Nexus would send the same number of solicitations for each of the three price groups.

¹³ For each Group, Nexus will record the number of people who selected each Plan. Nexus will track the number of subscribers that changed plans over the course of the pilot, and create additional data sets if this number becomes material.

¹⁴ Some consumers who receive the solicitation will turn out to be ineligible, *i.e.*, they already have broadband service. Nexus will attempt to track how many of these consumers elect to purchase commercial broadband service, which will be priced at one cent more than control group pricing. These subscribers will otherwise not be included in the pilot data, but this one metric will be tracked to provide a more accurate sense of the response rate to the solicitations.

4. Maintained Service Throughout Pilot
 - a. Control Group/Test Group I/Test Group II
 - b. Received Live Training/Received Online Training/No Training
5. Cancelled Service within First Two Months after End of Pilot
 - a. Control Group/Test Group I/Test Group II
 - b. Received Live Training/Received Online Training/No Training
 - c. Basic/Intermediate/Medium/Large Plans
6. Downgraded to Lower Usage Plan within First Two Months after End of Pilot
 - a. Large to Basic
 - b. Large to Intermediate
 - c. Large to Medium
 - d. Medium to Basic
 - e. Medium to Intermediate
 - f. Intermediate to Basic

7. Usage Level Analysis
 - a. Median Usage Levels for Basic¹⁵/Intermediate/Medium/Large Plans
 - b. Median Usage Level for Live Training/Online Training/No Training¹⁶
8. Additional Data Point for Lab-in-a-Van Subscribers
 - a. Current Telephone Service Provider: None; Wireline and/or Wireless; Lifeline

3. Randomization

For each of the seven geographic Test Service Areas, Nexus will randomly and evenly divide targeted subscribers within that area into the three Test Groups by the last two digits of the subscriber's account number, thus enabling a completely random allocation of subscribers into one of the test groups.

4. Mitigating Bias

Nexus will mitigate bias by controlling the population that will receive solicitation offers. Nexus will send solicitations to randomly pre-selected subscribers. This approach is expected to result in less bias than a pilot program subscriber base that is comprised of public advertising asking people to volunteer to participate in an experiment.

Although the solicitations will be random, there is potential for bias where, as here, program participants may realize that they are part of an experiment. Prospective pilot participants may realize this when asked upon sign up to complete the USAC questionnaires and agree to allow Nexus to use their usage data and information in ways that may be different from our ordinary privacy policy. Nexus will attempt to mitigate this bias, for example, by training its

¹⁵ Nexus will separately provide usage data for Basic Plan subscribers in Group II, who will not have a monthly recurring charge, to study whether they are less likely to use a service that has no will charges.

¹⁶ This metric may indicate whether training increased subscriber's use of the service.

personnel not to overly emphasize the experimental nature of the program, and in particular, the potential consequences of the subscriber's behavior on future policy. Nexus may still emphasize to the subscriber that its lower prices represent a subsidized opportunity, but would not urge a consumer to purchase any particular plan, attend training or not (beyond making the training information available), or make other choices, for the purpose of affecting the data produced by the experiment or any policy preference that any person may hope will be supported by such data.

Substitution bias certainly will occur as many consumers, especially those offered control group pricing, will have access to other non-pilot broadband alternatives that they might in some cases believe are preferable. It is possible that Nexus' lower-usage plans will appear to be relatively more popular than its higher usage plans when Nexus' pilot data is viewed in isolation, rather than among the U.S. population as a whole, because there would be greater substitution bias with respect to higher usage plans given that there are more high-usage plans than low-usage budget plans available in the market. But Nexus submits that this bias does not materially affect Nexus' core experiment – which is to test which service plans and rates attract the most new, previously-unserved low-income consumers who cannot afford the cost of the “substitute,” and not necessarily which plan is most desirable among people who can afford to choose.

By focusing primarily on Nexus' existing Lifeline mobile telephone subscribers, there will admittedly be a bias from the general exclusion of consumers who do not purchase any telephone service or purchase telephone from another provider. Nexus will attempt to measure any effect of this bias by recording additional data about the current home telephone subscriptions of broadband pilot subscribers who enter the pilot through the Lab-in-a-Van program.

5. Sample Size

Nexus' scale as a relatively large, existing Lifeline service provider affords important advantages as a pilot participant. As detailed herein, Nexus seeks to collect numerous data sets for use by the Commission. If the numbers in the data sets are too small, the margin of error would be high. While the Commission could, to an extent, try to mitigate this problem by aggregating data from multiple pilots, the comparing of "apples and oranges" will be of limited utility because each participant has been permitted to structure its own variables. Therefore, there is an advantage to choosing pilot participants that can offer the scale to send several hundred thousand solicitations and realistically aim to have more than 20,000 participants (8,000 each in Test Groups I and II plus the Control Group) in a relatively short period within the first couple months of the trial. Nexus' pilot proposal has been designed with the intent that all major test types would have at least 500 participants, which should be sufficiently large to deliver a statistically reliable sample. Nexus could, in fact, accept greater funding than the proposed budget if the Commission prefers to take even greater advantage of the scaled benefits for data collection and statistical accuracy.

6. Data Collection

Data collection from consumers is difficult and Nexus does not want to impose additional data collection obligations on participants that could detract from USAC's data collection. Therefore, Nexus does not intend to collect additional data from consumers and will focus instead of usage and subscription data and whether they participated in a Connected National literacy program.

F. Subscriber Eligibility Verification

Nexus will comply with the requirements pertaining to consumer qualifications for Lifeline set forth in new section 54.409 of the Commission's rules¹⁷ upon its effective date and any state-specific requirements in the state in which Nexus has will provide supported broadband. More specifically, Nexus will require all subscribers in the pilot program to demonstrate eligibility based on the following: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size (or the state-specific threshold); or (2) the household's participation in one of the federal assistance programs listed in new 47 C.F.R. § 54.409(a)(2) and any additional state programs, as applicable, in accordance with 47 C.F.R. § 54.409(a)(3). Nexus also will confirm that the subscriber is not already receiving broadband service (subsidized or otherwise) and that no one else in the subscriber's household is subscribed to a broadband Lifeline service, which will assure that no person receives two pilot program discounts and also, beyond the eligibility rules, that the pilot program is focused on increasing adoption among consumers who currently do not subscribe. Nexus is attaching a sample certification form that would be used for pilot participants.

Nexus will offer the broadband pilot program rates only to existing subscribers that subscribe to its Lifeline telephone service. This will assure that all subscribers are eligible for Lifeline without the need to re-impose the full process of Lifeline certification. A statement of Nexus' Lifeline eligibility procedures for telephone service is below:

1. Nexus' Procedures to Determine Consumer Eligibility

Analysis of Lifeline Eligibility. If Nexus cannot determine an applicant's eligibility for Lifeline by accessing income databases or program eligibility databases, Nexus personnel (either

¹⁷ 47 C.F.R. § 54.409.

employees or third party customer service representatives) will review documents to establish eligibility in accordance with the criteria set forth in 47 C.F.R. § 54.409. All Nexus personnel who interact with existing Lifeline subscribers or Lifeline applicants will be fully trained in assisting Lifeline applicants with Lifeline eligibility. All Nexus personnel have been trained to answer questions about Lifeline requirements, and how to review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state specific checklists. All Nexus personnel involved in enrolling Lifeline applicants have been trained on the Commission’s revised Lifeline eligibility rules and Nexus’ practices and policies designed to implement these new rules.

Proof of Lifeline Eligibility. Nexus follows the Commission’s requirements pertaining to acceptable documentation to establish eligibility based either on income level or participation in a qualified government assistance program. Specifically, acceptable documentation of program eligibility includes: (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.¹⁸ Acceptable documentation of income eligibility includes: (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

¹⁸ *Lifeline Reform Order* at ¶ 101.

award, or other official document containing income information. If the prospective subscriber presents Nexus 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 within the previous twelve months.¹⁹ Nexus subscribers may provide the documentation in person, via fax or email, or they may mail in copies to Nexus. Nexus keeps and maintains detailed, accurate records detailing the data source used to determine a subscriber's eligibility or the documentation the subscriber provided to demonstrate eligibility for Lifeline. If an applicant is unable to provide documentary proof of eligibility based on either household income level or current participation in a qualified program, Nexus will deny that application.

2. Nexus' Procedures for Subscriber Certifications

In the *Lifeline Reform Order*, the Commission established a path for a transition to a national, governmental database that will be used to confirm the initial and continued eligibility of a Lifeline subscriber.²⁰ Nexus will utilize that database when it becomes operational. Until that time, however, Nexus will continue to adhere to the following procedures for enrolling prospective subscribers in the Lifeline program.

Nexus has implemented certification procedures that will enable prospective subscribers to demonstrate their eligibility by contacting Nexus either in person or by telephone, facsimile, over the Internet, or other electronic transmission. Nexus personnel involved in enrolling Lifeline applicants verbally recite the certifications to Lifeline applicants where when enrolling in person or over the phone. Prospective subscribers who do not complete Nexus' Lifeline Application in person must return the signed document and eligibility documentation to Nexus by mail, facsimile, electronic mail or other electronic transmission. Nexus accepts electronic

¹⁹ 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁰ See *Lifeline Reform Order* at ¶ 403.

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.²¹

Every prospective subscriber is required to complete and sign a Nexus' revised "Lifeline Application." A sample of this document is provided as Exhibit 1. Nexus has modified its Lifeline Application for this pilot. It has also modified the form for use in certain states that have specific requirements, such as additional qualifying programs, but the operative language of Exhibit 1 will remain constant. Nexus's Lifeline Application conforms to the requirements of the *Lifeline Reform Order*, 47 C.F.R. § 54.410(d) and 47 C.F.R. § 54.405.

Information Collected. Nexus collects the following information from prospective subscriber in its Lifeline Application form, which will be adapted for the pilot program: (1) the subscriber's full name; (2) the subscriber's full residential address (P.O. Boxes are not permitted as a residential address); (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 number²²); (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 the income-based criterion, the number of individuals in his or her household.²³ It will also seek a certification that the prospective subscriber's household does not currently subscribe to any

²¹ See *Lifeline Reform Order* at ¶ 168; 47 C.F.R. § 54.419.

²² Nexus will only include language regarding a Tribal identification number on forms used in states with Tribal areas.

²³ 47 C.F.R. § 54.410(d)(2).

broadband service, and that Nexus may share anonymized subscriber data with USAC and the Commission.

Applicant Certification. In accordance with 47 C.F.R. § 54.410(d), in its Lifeline Application, Nexus requires 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 Nexus 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; (4) if the subscriber moves to a new address, that he or she will provide that new address to Nexus within 30 days; (5) if the subscriber provided a temporary residential address to Nexus, the subscriber will be required to verify his or her temporary residential address every 90 days; (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 acknowledges that he or she may be required to re-certify his or her continued eligibility for Lifeline at any time, and (10) that the applicant authorizes Nexus to access any state or federal records or database to verify his or her eligibility, and authorizes Nexus to release any records required for administration of the program, including to USAC to be used in the national Lifeline database and that failure to so authorize

Nexus will result in a denial of Lifeline benefits. Subscribers may also certify via interactive voice response (“IVR”).

In accordance with 47 C.F.R. § 54.410(d)(1), Nexus’ Lifeline Application discloses 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.

Finally, in accordance with 47 C.F.R. § 54.405(c), Nexus’ Lifeline Application indicates, using easily understood language, (1) that the service is a Lifeline service; (2) that Lifeline is a government assistance program; (3) that the 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.

3. Nexus’ Procedures for Annual Re-certification of Lifeline Subscribers

In accordance with the requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410(f), Nexus 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). Nexus’ annual re-certification form includes a

confirmation from the subscriber that the applicant's household receives only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service. Additionally, Nexus' re-certification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.

For 2012, Nexus is re-certifying the eligibility of its Lifeline subscriber base as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2012.²⁴ Nexus will notify its subscribers in writing that a failure to respond to the recertification request will result in de-enrollment in the Lifeline program. Nexus 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).

G. Post-Pilot Transition

After the program, Nexus will continue to offer non-discounted service. Nexus will measure subscriber losses that occur after the loss of the discount to provide that data in its final report to the Commission. Nexus will send text notifications to Test Group I and II pilot subscribers as follows:

IMPORTANT MESSAGE Your broadband Lifeline subsidy is about to expire. On XX/XX/XXXX, the discount you receive on your broadband service will expire and you will be charged the full rate for this service. Call 1-866-XXX-XXXX for further information.

H. Final Report

Nexus will submit a final report to the Commission at the end of the program that will include all of the data set forth in Section E of this Application. Though Nexus will make all of its anonymized data available to the Commission, Nexus also intends to include its own analysis

²⁴ *Lifeline Reform Order* at ¶ 130.

and hypotheses. It is hoped that the data and Nexus' anecdotal experiences will illuminate the importance of price on adoption decisions; the level of barrier imposed by the up-front cost of computers and other equipment; the influence of training options on adoption and usage; the role of low-cost, limited-usage options on low-income adoption; and the effectiveness of ongoing vs. only introductory subsidies.

Nexus looks forward to the opportunity to participate in this important broadband adoption and literacy program, and would be pleased to provide additional information to the Commission.

Respectfully submitted,



By:

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(202) 973-4242

Counsel to Nexus Communications, Inc.

July 2, 2012

Exhibit 1



Fax to: 1-877-870-9333 Email to: enroll@reachoutmobile.com or Mail to: ReachOut Wireless, PO Box 247168, Columbus, OH 43224-7168

 125 FREE Rollover Minutes **250 FREE Non-Rollover Minutes** **Wireless Broadband**
 (Lifeline avail. for limited time)

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 One	Persons in Household	Annual Income	Monthly Income
<ul style="list-style-type: none"> • Last year's federal or state tax return • Current income statement from an employer or paycheck stub (must cover 3 consecutive months within the previous 12 months) • A Social Security statement of benefits • A retirement/pension statement of benefits • An Unemployment/Workers' Compensation statement of benefit • Federal notice letter of participation in General Assistance • Divorce decree, child support award or other official document containing income information 	<input type="checkbox"/>	1	\$15,080	\$1,257
	<input type="checkbox"/>	2	\$20,426	\$1,702
	<input type="checkbox"/>	3	\$25,772	\$2,148
	<input type="checkbox"/>	4	\$31,118	\$2,593
	<input type="checkbox"/>	5	\$36,464	\$3,039
	<input type="checkbox"/>	6	\$41,810	\$3,484
	<input type="checkbox"/>	7	\$47,156	\$3,930
	<input type="checkbox"/>	8	\$52,502	\$4,375
	<u> </u> (insert # if over 8)	For each add'l person, add:	\$5,346	\$446

Last Name: _____ First Name: _____ Middle Initial: _____

Last 4 digits of Soc. Security #: _____ Date of Birth: _____

Residential Address: _____ Apt. _____ City: _____ State: _____ Zip: _____

(no P.O. Box for res. address)

Billing Address (if different): _____ Apt. _____ City: _____ State: _____ Zip: _____

I certify that:

___ I acknowledge that Lifeline is a government assistance program 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 Lifeline eligible consumers may enroll in the Lifeline Program.

___ I acknowledge that I may only receive Lifeline-discounted broadband service if no one at my household subscribes to any broadband service, even if that broadband service is not supported by Lifeline.

___ 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 ReachOut 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 ReachOut 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 ReachOut 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 Reachout Wireless to access any state or federal governmental records or database required to verify my statements herein and to confirm my continued eligibility for Lifeline and authorize social service agency representatives to discuss with and/or provide information to ReachOut Wireless verifying my participation in programs that qualify me for Lifeline. I also authorize ReachOut Wireless to release any records required for the administration of ReachOut Wireless's Lifeline program, including to the Universal Service Administrative Company (USAC), to be used in a Lifeline Program Database. I understand that the records are required to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. I authorize ReachOut Wireless to release my broadband usage data and other account information to USAC and the Federal Communications Commission on an anonymized basis for statistical purposes. I agree to promptly complete a questionnaire upon sign up and at the end of my broadband subsidy.

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

Applicant's Signature: _____ **Date** _____

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

In the Matter of)
)
Lifeline and Link Up Reform and) WC Docket No. 11-42
Modernization)
)

I, Steven Fenker, state that I am the owner and President of Nexus Communications, Inc. ("Nexus") and as such, an Officer of the company. In this capacity, I am responsible for the overall operations of the company.

Further, in the foregoing capacity, I am personally knowledgeable for the foregoing information provided in Nexus Communications, Inc.'s Application to participate in the Commission's broadband adoption pilot program for low-income consumers. I attest under penalty of perjury that the following information concerning this Application is true and accurate to the best of my knowledge, information and belief, and that, if Nexus is selected and agrees to participate in the pilot program, that:

(A) Nexus intends to offer broadband service pursuant to the Commission's rules and regulations for the Lifeline program;

(B) Nexus will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with its participation in the Pilot Program, including but not limited to procedures that Nexus will have in place to prevent duplicate broadband subsidies within its subscriber base, and procedures the carrier undertakes to de-enroll subscribers receiving more than one broadband discount per household;

(C) Nexus's pilot project broadband service offerings will provide sufficiently low latency to enable use of real-time applications such as Voice over Internet Protocol (VoIP). The usage limits for the plans are reasonably comparable to usage limits for comparable broadband offerings in urban areas, as described in the application; and

(D) Nexus will participate in the collection and sharing of anonymized qualitative and quantitative data with standardized data elements, formatting, and submission requirements, and Nexus will participate in workshops to discuss interim and final results of the project, and how best to use limited universal service funds to increase low-income consumers' adoption of broadband services.



Steven Fenker, President
Executed July 2, 2012