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July 13, 2012

VIA ECFS

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

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Thursday, July 12, 2012, Lance Steinhart, Brita Strandberg, and Heather Kirby, on behalf of Cellspan Inc. ("Cellspan"), as well as John Liebermann, President of Cellspan, spoke with Kimberly Scardino, Difie Osborne and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed Cellspan's Compliance Plan as filed on June 19, 2012.

John Liebermann gave an overview of Cellspan. Mr. Liebermann emphasized the Company's commitment to comply with all FCC rules and to prevent waste, fraud, and abuse of the Lifeline program. We discussed the Company's procedures regarding fraud prevention during the Lifeline enrollment process, highlighting the Company's intent to use various duplicate database checks until the National Lifeline Accountability Database is available.

Finally, Cellspan agreed to file a revised Compliance Plan with suggested clarifications.

Attached is a copy of Cellspan's presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Attorney for Cellspan Inc.

Attachments

cc: John Liebermann
Brita Strandberg
Kimberly Scardino
Jonathan Lechter

Cellspan, Inc. Cellspan Wireless, Inc.

Presentation before the
Federal Communications Commission
July 12, 2012



AGENDA

- **Introduction to Cellspan**
- **Financial & Technical Capability**
- **Cellspan's Lifeline Plans**
- **Marketing / Advertising**
- **Enrolling Lifeline Customers**
- **Recertifying Lifeline Customers**
- **Preventing Waste, Fraud & Abuse**
- **Q & A**

CELLSPAN

Name and Identifiers used by Cellspan

- **Cellspan, Inc.**
- **Cellspan Wireless, Inc.**
- **Cellspan Wireless**

CELLSPAN

In compliance with newly amended section 54.202, Cellspan certifies:

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

Financial & Technical Capability

Cellspan is financially & technically capable of providing the supported Lifeline service:

- **Financial Resources**
- **Key Management Personnel**

Cellspan's Lifeline Plans

Lifeline 100 Minutes Plan - \$0

100 anytime minutes per month

- Unused minutes rollover for 90 days
- 3 text messages = 1 minute of usage

Lifeline 250 Minutes Plan - \$0

250 anytime minutes per month

- Unused minutes do not rollover
- 1 text messages = 1 minute of usage

Included in Both Plans:

Free handset

Free calls to Customer Service

Free calls to 911

Voicemail

Caller-ID

Call waiting

Additional bundles of minutes:

\$5 = 35 minutes

\$10 = 75 minutes

\$20 = 160 minutes

\$30 = 270 minutes

\$50 = 700 minutes

Cellspan's Lifeline Plans

Public Safety and 911 / E911 Access:

- **Cellspan will ensure that all handsets used in connection with its Lifeline service are E911-compliant.**
- **Cellspan will provide its Lifeline customers with access to 911 and E911 services:**
 - **through its underlying carrier, Sprint**
 - **at the time of Lifeline service initiation**
 - **regardless of activation status and minute availability**

Marketing / Advertising

All materials will :

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



Enrolling Lifeline Customers

Eligibility Confirmation:

- 1. Confirm prospect's identity**
(see government issued picture ID)
- 2. Confirm program or income eligibility**
(see proof)
- 3. Confirm valid household address and whether permanent/temporary or multi-household**
(validate w/USPS)
- 4. Confirm prospect not currently receiving subsidy**
(ask prospect; perform duplicate check into internal database, national database when available)
- 5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement**

Enrolling Lifeline Customers

End-User Education and Disclosures:

- **Lifeline is a federal non-transferable benefit**
- **Lifeline service is available for only one line per household**
- **A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses**
- **Households are NOT permitted to receive benefits from multiple providers**
- **Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government**

Enrolling Lifeline Customers

End User Attestations: See Certification Form

I certify, under penalty of perjury: *(Initial by Each Certification)*

- _____ (1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
- _____ (2) I am a current recipient of the program checked above, or have an annual household income at or below 135 percent of the Federal Poverty Guidelines.
- _____ (3) I have provided documentation of eligibility if required to do so.
- _____ (4) I understand that I and my household can only have one Lifeline-supported telephone service. Cellspan has explained the one-per household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government.
- _____ (5) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline supported service from any other land line or wireless company such as Safelink, Assurance, or Reachout Wireless.
- _____ (6) I understand my Cellspan Lifeline service is a non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- _____ (7) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period which I may use the service or contact Cellspan to confirm that I want to continue receiving their service.
- _____ (8) I will notify Cellspan within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if my household:
- (1) ceases to participate in the above federal or state program, or my annual household income exceeds 135% Federal Poverty Guidelines.
 - (2) is receiving more than one Lifeline supported service;
 - (3) no longer satisfies the criteria for receiving Lifeline support.
- _____ (9) I will notify Cellspan within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Cellspan every ninety (90) days. If I fail to respond to Cellspan's address verification attempts within thirty (30) days, my Cellspan Lifeline service may be terminated.
- _____ (10) Cellspan has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my Cellspan Lifeline service.
- _____ (11) I authorize and understand that Cellspan may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program all the information related to my account including but not limited to my name, date of birth, social security, usage history, address and phone number.
- _____ (12) I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy.
- _____ (13) I understand that if USAC identifies I am receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

APPLICANT'S SIGNATURE

DATE

Recertifying Lifeline Customers

Annual Recertification Compliance:

- **Cellspan will re-certify all active Lifeline customers by the annual anniversary of their enrollment.**
- **All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.**
- **In addition, Cellspan will follow any state-specific requirements.**

Preventing Waste, Fraud & Abuse

- **Cellspan will utilize a diligent enrollment process**
- **Cellspan's business model will primarily employ direct, high quality contact (initially via events)**
- **Cellspan will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)**
- **Cellspan will implement a 60-day non-usage policy**
- **Cellspan will emphasize compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures**

Preventing Waste, Fraud & Abuse

Additional Measures to prevent Waste, Fraud & Abuse:

- **Duplicate Checks at enrollment**
 - **Internal Database**
 - **Pooled External Database (CGM, LLC)**
 - **National Database, when in place**
- **3rd party subsidy edits to ensure no subsidy is requested for**
 - **duplicate subscribers, or**
 - **inactive subscribers (according to non-usage policy)**
- **Provide customer data to PUCs, FCC, and USAC as requested**

Cellspan, Inc. Cellspan Wireless, Inc.

Questions?

