
**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
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23
)	

PETITION FOR WAIVER OF SECTION 54.410(f) OF THE COMMISSION'S RULES

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I. INTRODUCTION AND SUMMARY

i-wireless, LLC (“i-wireless” or the “Company”), pursuant to Section 1.2 and Section 1.3 of the Federal Communications Commission’s (“FCC” or the “Commission”) rules,¹ hereby petitions for a one-time waiver of 47 C.F.R. § 54.410(f) with respect to the customers who enrolled in i-wireless’ Lifeline program between January 1, 2012 and May 31, 2012. All the customers enrolled during this period were enrolled pursuant to i-wireless’ pathbreaking compliance plan, which included express commitments to require proof of eligibility irrespective of state requirements to do so, to implement a one per household limitation with specific measures and procedures to prevent duplicate Lifeline benefits from being provided to the same household and emphasizing that limitation in all marketing, advertising, and website content, and to use an application form that incorporated substantially all the certifications later required by Section 54.410(d) of the

¹ See 47 C.F.R. §§ 1.2, 1.3.

Commission's rules, as adopted in the *Lifeline Reform Order*.² Grant of the requested one-time waiver will avoid imposition of unnecessary, duplicative, burdensome, and confusing requests to existing Lifeline customers that they recertify their eligibility within months of their initial enrollment, without sacrificing any significant program protections.

II. BACKGROUND

In the *Lifeline Reform Order*, the Commission promulgated a series of rules to modernize and reform the low-income programs supported by the federal Universal Service Fund ("USF") and to detect and prevent waste, fraud and abuse of USF resources. Among those important reforms is a requirement that Eligible Telecommunications Carriers ("ETCs") obtain from all of their enrolled Lifeline customers annual certifications that the customers remain eligible to receive Lifeline-supported services. For 2012, Paragraph 132 of the *Lifeline Reform Order* requires Lifeline providers to obtain from each customer enrolled as of June 1, 2012, a sworn certification containing specific factors set forth at Section 54.410(d).³

As context for this request, it is important to recognize that i-wireless' subscriber base is much less likely to be plagued by ineligible users than other providers. Since the *Compliance Plan Order*⁴ and during all of the portion of 2012 when it was enrolling customers prior to the *Lifeline Reform Order*'s requirements becoming effective, i-wireless' enrollment procedures required applicants to submit documentation as proof for both program-based and income-based eligibility

² See *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 Nos. 11-42, 03-109, 12-23, CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline Reform Order*").

³ See *id.* ¶ 132; 47 C.F.R. §§ 410(d), (f).

⁴ See *i-wireless, LLC Petition for Forbearance from 47 USC. §214(e)(1)(A)*, Order, 26 FCC Rcd. 14508, DA 11-1763 (rel. Oct. 21, 2011) ("*Compliance Plan Order*").

alike, regardless of whether such proof was required by federal or state law. Moreover, under its Compliance Plan, i-wireless had implemented a 60-day non-usage policy before such a requirement was adopted as part of the *Lifeline Reform Order*.⁵ i-wireless also had, pursuant to its Compliance Plan, instituted significant procedures to prevent both individual subscriber and household duplicate benefits, to the extent possible to do so in the absence of a database.

III. I-WIRELESS' APPLICATION FORM IN USE BETWEEN JANUARY 1 AND MAY 31, 2012 MET SUBSTANTIALLY ALL THE REQUIREMENTS OF 47 C.F.R § 54.410, AND ANY REMAINING DEFICIENCIES ARE EITHER NOT SIGNIFICANT OR CAN BE REMEDIED IN OTHER WAYS.

i-wireless' current Lifeline application form ("post-June 1 form") fully complies with Section 54.410(d) and was approved by this Commission as part of the Company's ETC Designation petition in an Order released June 13, 2012.⁶ However, between January 1, 2012 and May 31, 2012, i-wireless utilized a Lifeline application form ("pre-June 1 form") that the Commission had approved in October 2011 as part of the Company's Compliance Plan⁷ and which contained nearly all of the information now required by Section 54.410(d). Namely, the pre-June 1 form collected the following information which is also required by 47 C.F.R. § 54.410(d):⁸

- the subscriber's full name (47 C.F.R. § 54.410(d)(2)(i));

⁵ See i-wireless LLC's Revised Compliance Plan, Section IV.A., CC Docket No. 96-45, WC Docket No. 09-197 (filed Sept. 9, 2011) ("Compliance Plan").

⁶ See *Telecommunications Carriers Eligible for Universal Service, i-wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia*, Order, WC Docket No. 09-197, DA 12-934 (rel. June 13, 2012).

⁷ See Compliance Plan; See *Compliance Plan Order*, ¶32.

⁸ Attached hereto as Exhibit A is i-wireless' pre-June 1 form, followed by the Company's post-June 1 form in Exhibit B with check marks indicating the fields which were also substantially contained in the Company's pre-June 1 form.

- subscriber’s full residential address (P.O. Box not permitted) (47 C.F.R. § 54.410(d)(2)(ii));
- subscriber’s date of birth (“DOB”) (47 C.F.R. § 54.410(d)(2)(v)),
- last four digits of Social Security number (“SSN”)(47 C.F.R. § 54.410(d)(2)(vi));
- if qualifying under program-based criteria, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits (47 C.F.R. § 54.410(d)(2)(vii));
- if qualifying under income-based criteria, the number of individuals in his or her household (47 C.F.R. § 54.410(d)(2)(viii)).

In addition, the pre-June 1 form required the subscriber to certify, under penalty of perjury:

- that the information contained in their application was true and correct (47 C.F.R. § 54.410(d)(3)(vii); *see also* 47 C.F.R. § 54.410(d)(3)(i));
- that providing false or fraudulent documentation in order to receive Lifeline benefits is punishable by law (47 C.F.R. § 54.410(d)(3)(viii));
- that the subscriber understood that Lifeline is only available for one phone line per household – that they were head of household and would only receive Lifeline from i-wireless (*see* 47 C.F.R. § 54.410(d)(vi)); in addition, the pre-June 1 form listed the names of other top Lifeline carriers in an effort to trigger the realization of duplicate service by prospective subscribers—a measure to which i-wireless was the first to commit⁹ and continues to follow, though it remains an industry best practice and not a rule;

⁹ See Compliance Plan at section III.B page 8.

- that the subscriber would immediately notify i-wireless if he or she no longer qualify for Lifeline, or had a question as to whether he or she still qualified (*see* 47 C.F.R. § 54.410(d)(3)(ii));¹⁰
- that the phone would be used only for the subscriber or his/her family's benefit, and would not be resold (*see* 47 C.F.R. § 54.410(d)(1)(vi)).

The pre-June 1 application form also made clear that:

- false statements to receive benefits are punishable by fines and/or imprisonment (*see* 47 C.F.R. § 54.410(d)(1)(i));
- only one Lifeline benefit was available per household (47 C.F.R. § 54.410(d)(ii));
- the subscriber would discontinue any other Lifeline service from any other provider (including listing several prominent brand names) (*see* 47 C.F.R. § 54.410(d)(1)(iv)).

Notably, the only items specified in Section 54.410(d) that were not covered by the pre-June 1 application form are not significant or can be addressed in other ways until the subscribers that would be covered by the waiver could be recertified in 2013. The only currently effective program protection covered by Section 410(d) that was not included in the pre-June 1 disclosures and certifications is the requirement that a subscriber notify the provider within 30 days of moving to a new address.¹¹ i-wireless can address this by texting its customers once per quarter through the end of 2013 as to the need to provide an updated address, and it commits to doing so as a condition of

¹⁰ In this regard, i-wireless' pre-June 1 application required stricter compliance than the Commission's eventual rule, which requires such notification within 30 days. *See* 47 C.F.R. § 54.410(d)(3)(ii).

¹¹ *See* 47 C.F.R. § 54.410(d)(3)(iv).

this waiver. The remaining items covered by Section 410(d) are not significant with respect to i-wireless during the interim period:

- 47 C.F.R. § 54.410(d)(1)(iii)'s requirement to provide the definition of a household under the *Lifeline Reform Order* is not significant because this definition is narrower than the address-based definition that i-wireless had used when signing up these subscribers;
- 47 C.F.R. § 54.410(d)(1)(v)'s requirement to inform consumers on the certification form that violation of the one-per-household rule would result in de-enrollment is already implied from the certification that Lifeline is available only for one line per household, and is also supplemented by the marketing disclosure requirements both of i-wireless' Compliance Plan, which were applicable when these subscribers were enrolled;
- 47 C.F.R. § 54.410(d)(2)(iii)'s requirement to ascertain whether a subscriber's address is temporary or permanent, and 47 C.F.R. § 54.410(d)(3)(v)'s requirement for the subscriber to certify that he or she is required to verify his or her temporary residential address every 90 days are of no import because the temporary address verification requirement has not yet been approved by the Office of Management and Budget; and
- 47 C.F.R. § 54.410(d)(3)(ix)'s requirement that the subscriber certify acknowledgement that he or she may be required to recertify continued eligibility for Lifeline at any time and that failure to do so may result in a loss of Lifeline benefits can, during the interim period for which this waiver would be relevant, be addressed through full disclosures and warnings at the time that any recertification is sought.

As mentioned above, the pre-June 1 form captured the DOB and last four digits of the SSN, two key attributes driving the FCC's requirement for recertification of an ETC's Lifeline customer base prior to June 1, 2012. i-wireless already has the information necessary to populate the NLAD for all its customers enrolled in 2012, and therefore will remind those who have moved to be sure to update their address, and will recertify all customers enrolled prior to January 1, 2012 in accordance with Section 410(f). To illustrate the effect of the 2012 recertification requirement on the Company, lines, 82 percent of i-wireless' lines reported for May 2012 had start dates in 2012, with DOB and last four digits of the SSN captured for all. To the extent such data was not captured for the remaining 18 percent (the pre-2012 enrollees), those will be recertified in 2012.

IV. RECERTIFICATION OF I-WIRELESS' ENROLLEES FROM THE FIRST FIVE MONTHS OF 2012 SO SOON AFTER INITIAL ENROLLMENT WILL CAUSE UNDUE CONFUSION AND BE UNDULY BURDENSOME, WITHOUT SUBSTANTIAL BENEFIT IN PROGRAM PROTECTION.

i-wireless' initial efforts to recertify a portion of the customers in question so soon after their original enrollment/certification—which i-wireless has already started—has only resulted in subscriber confusion, causing many to question the validity of the program and threaten termination. Since i-wireless already has the necessary information from these customers to seed the NLAD and these customers have already demonstrated their eligibility for Lifeline and an understanding of the one-per-household requirement, recertification of subscribers enrolled during the first five months of 2012 is counterproductive, not only to the interests of i-wireless, but also to those of the subscriber and the FCC.

The cost to recertify these recently-certified end users will easily exceed \$2 million, based on the early returns (and terminations) the Company has experienced. For example, i-wireless estimates the direct mail and postage expenses necessary to contact the affected customer base will be \$500,000. i-wireless will need to operate a call center specifically to manage the recertification

process—which will cost an estimated \$1.2 million over the course of the project. Further, the program management, IT investment and reporting costs will total an estimated \$400,000. Finally, i-wireless is concerned about the numbers of valid, eligible, active customers who will fail to respond to the recertification request because of confusion, lack of understanding, or frustration due to being asked to provide the required information so soon after their initial enrollment.

i-wireless informs and seeks to prepare its Lifeline customers at enrollment about the annual recertification process. However, part of the problem with recertifying these customers so quickly after their initial enrollment is the obvious duplication of the data request, compounded by the fact that the Company often calls from an out-of-state number and then struggles to effectively explain why the information is needed again so soon. These customers, and Americans as a whole, are rightfully cautious about providing third parties with the type of data required by annual recertification. The following examples demonstrate government-directed advisories that specifically warn consumers against conveying sensitive, personal and/or financial information to prevent being victims of fraud or identity theft:

"To reduce or minimize the risk of becoming a victim of identity theft or fraud, there are some basic steps you can take... Be stingy about giving out your personal information to others unless you have a reason to trust them, regardless of where you are."¹²
-United States Department of Justice

"Never send money or give out personal information such as credit card numbers and expiration dates, bank account numbers, dates of birth, or social security numbers to unfamiliar companies or unknown persons."¹³
-Federal Bureau of Investigation (FBI)

"Never give out personal information (such as your Social Security number, credit card numbers or your address) over the telephone unless you initiate the call, and it's to a well-known and trusted outfit."¹⁴

¹² *Identity Theft and Identity Fraud*, U. S. Dep't. of Justice, <http://www.justice.gov/criminal/fraud/websites/idtheft.html> (last accessed July 20, 2012).

¹³ *Common Fraud Schemes*, Fed. Bureau of Investigation, <http://www.fbi.gov/scams-safety/fraud> (last accessed July 20, 2012).

-Federal Deposit Insurance Corporation (FDIC)

While some messages imply that it may be okay to provide sensitive information to known or trusted parties, i-wireless must still combat the suspicion engrained in the minds of many who have taken to heart cautions such as:

"Don't respond to messages that ask for your personal or financial information, whether the message comes as an email, a phone call, a text message, or an ad. Don't click on links in the message, or call phone numbers that are left on your answering machine, either. The crooks behind these messages are trying to trick you into giving up your personal information."¹⁵

-Federal Trade Commission - The Nation's Consumer Protection Agency

In summary, customers are receiving contradictory direction on handling their personal information. If the Commission requires i-wireless to abide by the 2012 annual recertification requirement for its customers that have not yet been enrolled in the Company's Lifeline program for 12 months, it will be to the detriment of the affected customers, to i-wireless, and ultimately to the program's stated intent.

i-wireless estimates as many as 20% of the eligible consumers in question will fail to respond as described above, equating to the loss of over 35,000 eligible customers and over \$8 million in future revenue. Consequently, taking both operational costs and loss of revenue into account, the 2012 annual recertification requirement will result in a cost to the Company of over \$3.8 million—a cost that is unnecessary, especially since the customers in question were enrolled according to i-wireless' FCC-approved Compliance Plan which, as described herein, substantially complies with the recent rule changes in the *Lifeline Reform Order*. Requiring i-wireless to follow

¹⁴ *Your Wallet: A Loser's Manual*, Fed. Deposit Ins. Corp., <http://www.fdic.gov/consumers/consumer/news/cnfall97/wallet.html> (last accessed July 20, 2012).

¹⁵ *Putting a Lid on International Scams: 10 Tips for Being a Canny Consumer*, FTC Facts for Consumers, May 2010, <http://www.ftc.gov/bcp/edu/pubs/consumer/general/gen22.pdf>.

through with the 2012 recertification requirement will result in the de-enrollment of otherwise eligible subscribers and require the Company to sustain a considerable cost burden, ultimately resulting in a reduction in future benefits to this subscriber base. i-wireless does not believe this was the Commission's anticipated or intended outcome of the 2012 recertification requirement.

These costs come with little or no discernible benefit. As documented above, i-wireless' pre-June 1 application covered nearly all the disclosures and certifications required by Section 410(d), with any gaps able to be filled by measures such as periodically reminding subscribers of their duty to inform i-wireless if they move. It is highly unlikely that the incremental savings that would come from collecting certifications in the second seven months of 2012 from subscribers i-wireless enrolled in the first five months of 2012 would outweigh the costs of obtaining those certifications. Under these circumstances, grant of the requested waiver would further the public interest.¹⁶

¹⁶ Generally, the Commission's rules may be waived if good cause is shown. *See* 47 C.F.R. § 1.3. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. *See Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*). In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. *See WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166. Waiver of the Commission's rules is appropriate only if both (i) special circumstances warrant a deviation from the general rule, and (ii) such deviation will serve the public interest. *See NetworkIP, LLC v. FCC*, 548 F.3d 116, 125-128 (D.C. Cir. 2008); *Northeast Cellular*, 897 F.2d at 1166.

V. CONCLUSION.

In light of these circumstances, i-wireless respectfully submits that its enrollment of Lifeline customers during calendar year 2012, and specifically prior to June 1, complies with the intent of the initial and annual recertification requirements now codified at Sections 410(d) and (f). Requiring i-wireless to recertify those same customers during calendar year 2012 would unnecessarily burden, confuse, and annoy consumers, would force i-wireless to de-enroll from its Lifeline program many consumers who already have certified their Lifeline eligibility in 2012, and would not advance the goals or objectives identified in the *Lifeline Reform Order*.

Accordingly, i-wireless respectfully requests that the Commission grant a limited one-time waiver of Section 410(f) with respect to i-wireless' existing Lifeline customers that were activated on or after January 1, 2012. i-wireless has begun and will continue to recertify all existing Lifeline customers who activated prior to January 1, 2012.

Respectfully submitted,



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July 23, 2012

EXHIBIT A

Pre-June 1 Lifeline Certification Form

LOUISIANA LIFELINE APPLICATION

IN ORDER TO APPLY SUCCESSFULLY YOU MUST:

1. Complete Sections #1 and #2 **OR** #3. Initial and sign section #4.
2. Attach documents to support proof of household income or dated copy of program eligible documents.
3. Mail application to: **Access Wireless, 420 Progress Drive, Mattoon, IL 61938-9949 OR** for faster processing fax to: **1-973-599-6573**

1. PERSONAL INFORMATION (ALL FIELDS BELOW MUST BE COMPLETED)

The person below **MUST BE** the same person applying for the discount. Please do not forget to sign the application below in Section #4.

First Name: _____ Last Name: _____ Date of Birth: ____/____/____
(Please Print Clearly) (Please Print Clearly) (MM/DD/YYYY)

Home Address: _____ Apt: _____ Last 4-digits of SSN: _____
(PO Boxes Cannot Be Accepted)

City: _____ State: _____ Zip Code: _____ Alternate Contact Number (____) - ____ - ____

2. PROGRAM-BASED ELIGIBILITY

Check all current program(s) the person in Section 1 is enrolled. If a household member is NSLP enrolled, program requirement for eligibility is satisfied. **If you are qualifying because of eligibility in a qualified program, you must provide current proof of program participation with this application. Note: Copies of supporting documentation WILL NOT be returned.**

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- 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 (NSLP)
- Federal Public Housing Assistance (FPHA) Section 8

INDIVIDUALS OR FAMILIES LIVING IN TRIBAL LANDS

- Head Start Program (income qualifying standards only)
- Tribal National School Lunch Program (TNSLP)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribal Temporary Assistance for Needy Families (TTANF)

- OR -

3. INCOME-BASED ELIGIBILITY

If qualifying by income: Make sure you list the income for ALL household members and provide ALL of your income documentation. If your household size is greater than 7, write the number and add \$5,157 to \$45,644 for each additional person.

Household Size <small>(Check off the box which applies)</small>	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6	<input type="checkbox"/> 7	<input type="checkbox"/> Other
Maximum Annual Household income:	\$14,702	\$19,859	\$25,016	\$30,173	\$35,330	\$40,487	\$45,644	\$

You must attach proof of income for each household member as reported above, examples include:

- Prior year's State or Federal tax return **OR**
- Most recent type of current statement from the income source(s) noted below:
 - Three consecutive months' worth of your most current pay stubs
 - Social Security benefits statement
 - Veterans Administration benefits statement
 - Retirement/Pension benefit statement
 - Divorce decree or child support document
 - Unemployment/Workers Compensation benefits statement

(Supporting documentation WILL NOT be returned)

4. SIGNATURE PLEASE INITIAL EACH OF THE 5 STATEMENTS AND SIGN BELOW

Disclosure Statement: Perjury and false statements are punishable by fines and/or imprisonment. By signing below, I certify under penalty of perjury:

1. ____ The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law.
2. ____ I understand that Lifeline is only available for one phone line per household, whether landline or wireless. I am the head of household and will only receive Lifeline from Access Wireless.
3. ____ If I currently receive Lifeline assistance from a different telephone provider from any other landline or wireless telephone company, I will notify my current provider when I am approved for Lifeline Assistance through Access Wireless. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names Life Wireless, TAG Mobile, Reachout Wireless, Assurance Wireless and Safelink.)
4. ____ I certify that I will only use this phone for my family's own use and will not resell it.
5. ____ I will notify Access Wireless immediately if I no longer qualify for Lifeline, or if I have a question as to whether I would still qualify.

 X _____ / / _____
 SIGNATURE (Please use blue or black ink) Date

 X _____
 PRINTED NAME PROMO CODE



EXHIBIT B

Post-June 1 Lifeline Certification Form

LIFELINE APPLICATION

This signed authorization is required in order to enroll you in the Lifeline Program in your state. This authorization is only for the purpose of verifying your participation in these programs and will not be used for any purpose other than for the Lifeline program. Service requests will not be processed until this form has been received and verified by Company. I authorize the company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program.

Things to know about the Lifeline Program:
 (1) Lifeline is a federal benefit.
 (2) Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers; and
 (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.

Applicant Information:

✓ First Name: _____ MI: _____ Last Name: _____ Date of Birth: Month ___ Day ___ Year _____

✓ Social Security Number or Tribal ID Number (Last 4 digits): _____ ✓ Contact Telephone Number: _____

✓ Residence Address (No P.O. Boxes, Must be your principal address): This address is Permanent Temporary Multi-Household

_____ APT/ Floor/ Other _____ City: _____ State: _____ ZIP Code: _____

Billing Address (May Contain a P.O. Box)

_____ APT/ Floor/ Other _____ City: _____ State: _____ ZIP Code: _____

_____ I hereby certify that I participate in at least one of the following programs: (Check all that apply)

Initial Here

- _____ Supplemental Nutrition Assistance Program (SNAP)
- _____ Supplemental Security Income (SSI)
- _____ Federal Public Housing Assistance
- ✓ _____ Low- Income Home Energy Assistance Program (LIHEAP)
- _____ National School Lunch Program (free program only)
- _____ Temporary Assistance for Needy Families (TANF)
- _____ Medicaid

_____ I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG). There are _____ individuals in my household.

Initial Here

FOR OFFICE USE ONLY:
 Company Representative:

Documentation Verified (description):

Representative Signature:

Date:

Is this a multi- family dwelling? _____

✓ **You must provide documented proof of your participation in the above programs or your income.**

✓ 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% 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. Access Wireless 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 Access Wireless Lifeline service is 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 terminated; I will be notified thirty (30) days before termination, during which period I may use the service or contact Access Wireless to confirm that I want to continue receiving their service.
- ✓ _____ (8) I will notify Access Wireless 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% of the 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 Access Wireless 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 Access Wireless every ninety (90) days. If I fail to respond to Access Wireless' address verification attempts within thirty (30) days, my Access Wireless Lifeline service may be terminated.
- _____ (10) Access Wireless 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 Access Wireless Lifeline service.
- _____ (11) I authorize and understand that Access Wireless 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