



FCC Compliance Review Meeting
PlatinumTel Communications, LLC
September 2012



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Company History



- 2001** Launched PlatinumTel Wireless
- 2003** Released PlatinumTel Online Dealer System (P.O.D.S.)
- 2004** Launched Nationwide Service on 3G PCS Network
- 2009** Launched Unlimited Talk & Text w/100MB plan
- 2010** Launched the most affordable pay-as-you-go wireless plan in the U.S. – **Real Paygo**
- 2011** Launched Care Wireless Lifeline program serving the State of Illinois

Milestones

- 3rd Oldest M.V.N.O. in the United States
- 1st Wireless Provider to offer Online Activations
- 1st Wireless Provider to offer Online Airtime Top-Up
- 1st Wireless Provider to offer \$10 Top-Up option

Financial & Management Strength



Care Wireless is a brand offered by PlatinumTel Communications, LLC.

PlatinumTel Communications LLC is:

- A privately held Limited Liability Delaware Corporation, based in Justice, IL
- Offering prepaid wireless service since 2001
 - **2001 – 2003** MVNO on the Cingular Wireless network
 - **2004 – Present** MVNO on the Sprint Nationwide network
- Began offering Lifeline service in 2011 under the brand Care Wireless
- Management team has over 50 years of combined experience in wireless
- PlatinumTel owned and operated:
 - U.S. based customer service
 - U.S. based enrollment call center
 - U.S. sales support department
 - U.S. based IT/R&D department
 - U.S. based procurement & logistics



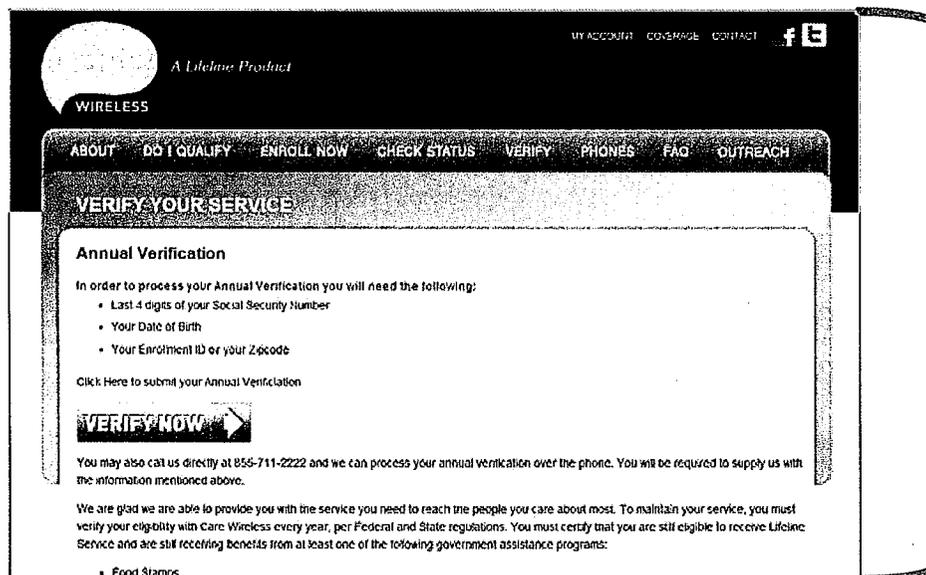
About the Company

Technical Capabilities



Using its own IT resources and R&D group, PlatinumTel Communications has developed the tools necessary for Care Wireless to ensure the prevention of waste, fraud and abuse.

- Address verification and sanitization via USPS AMS solution
- Database duplicate verification of applicants
- Automated annual certification procedures
- Automated customer notification systems for billing, certification, non-usage, etc.
- Automated document submission, receipt, and review procedures



Example:
Automated online annual re-verification portal for customers.

Care Wireless Lifeline Plan



Care Wireless Lifeline Plan

Customer Cost	Airtime Credit	Airtime Value – Voice	Airtime Value – SMS	Access Days
Free	\$15.00	Up to 300 Minutes*	Up to 750 Messages**	30 Days

*Voice Minutes are debited at 5¢ per minute

**Text messages are debited at 2¢ per message (sent or received)

All customers receive the following:

- A free basic wireless phone supplied by Care Wireless
 - Customers have the option to purchase an upgrade at carewireless.com
 - All handsets supplied and/or sold by Care Wireless are E911 compliant
- Free Nationwide Long Distance
- Free Calling Features – Nationwide Coverage, Caller ID, Call Waiting, and Voicemail



911 / E911 Access

- All handsets provided by and/or sold by Care Wireless are tested to ensure 911 / E911 compliance
- 911 / E911 Access is available to Care Wireless customers:
 - At the time of service activation
 - Provided through underlying carrier, Sprint
 - Access is available regardless of activation status and/or airtime availability

Enrollment Compliance



Applicants for Care Wireless Lifeline service are made aware of the following during the enrollment process, whether telephonically, online, or when working with an authorized agent (see Care Wireless enrollment application for full list – slide 15):

- Care Wireless Lifeline service is available to only one person per household
- The customer may be required to recertify their eligibility at any time
- Unused service for 60 days is suspended (subject to a 30 day grace period)
- They must notify Care Wireless within 30 days of moving
- They are required to produce documents proving their eligibility
- The authorized Care Wireless to access any records to verify their statements to confirm eligibility
- That all the information they have provided is true and correct to the best of their ability
- That Care Wireless Lifeline service is not transferable
- That they will notify Care Wireless if they no longer qualify to receive Lifeline service

Applicants who do not agree to any of the rules as set by the FCC are not enrolled for Care Wireless Lifeline Service.



Care Wireless takes various steps to ensure compliance with the rules set forth by the FCC.

- **Duplicative Check**
 - Duplicate applications from the same person
 - Duplicate applications from the same household/address
- **Address Validation**
 - Address validation and sanitization done through API connection via USPS AMS
 - Unverifiable addresses require the applicant to submit physical proof of address
- **Document Review**
 - Applicants are required to submit proof of eligibility with all applications, via:
 - Email, Fax, Web, USPS
 - Documents are reviewed and enrollments are commented per USAC guidance
 - Once reviewed, documents are destroyed. Care Wireless does not retain any physical documents submitted by consumers



- **Highly Trained Staff**
 - Care Wireless staff is kept up to date on all FCC rules to ensure daily compliance.
 - Ongoing training of all enrollment staff to keep the enrollment process consistent with FCC rules
 - Detailed call center script to ensure applicants are aware of the requirements to receive Lifeline benefits
- **Non-Usage Policy**
 - Customers are notified immediately after 60 days of non-usage
 - Customers that do not respond within 30 days are de-enrolled from the program. To maintain Lifeline Service, customers must:
 - Use the service within the 30 day period
 - Contact Care Wireless directly to indicate they wish to continue service

Annual Certification



- Since beginning to offer Lifeline service in 2011, Care Wireless has informed customers that they may be required to re-certify their eligibility at any time
- Customers are able to recertify via:
 - IVR
 - Online at www.carewireless.com
 - Speaking to an enrollment representative
 - By sending in a recertification form via USPS
- Care Wireless notifies existing customers up to 60 days in advance of their Annual Recertification
 - Those that do not respond by their anniversary date are re-notified with a termination pending letter with a 30 day period to recertify.
 - Failure to respond to the termination pending letter results in de-enrollment from the Lifeline program within 5 days of the conclusion of the 30 day period.
- Customers are notified for re-certification via:
 - SMS
 - Robocalls
 - Email
 - Via USPS letters
 - By re-certification representatives

Lifeline Offering

Advertising Compliance



carewireless.com clearly states requirements/qualifiers:

Care Wireless is a Lifeline Product



WIRELESS

A Lifeline Product

ABOUT DO I QUALIFY? ENROLL NOW CHECK STATUS VERIFY PHONES FAQ OUTREACH

DO I QUALIFY?

Qualifying for Care Wireless Lifeline Service is easy.

Just make sure you meet all four (4) of the following eligibility requirements and you will be able to receive your FREE Care Wireless Phone with 300 FREE Monthly Minutes.

NOTE: By Law, the Lifeline Program is only available for one (1) phone per household.

You are required to send a COPY of any current document that proves your participation in one of the programs based on which you qualify and have selected. All documents must have the same name and address as provided in the application.



1 Per Household Rule

Documentation Required to enroll

Care Wireless website terms and conditions also clearly state all the requirements to receive Lifeline benefits

MY ACCOUNT COVERAGE CONTACT



Lifeline Offering Advertising Compliance Cont.



Care Wireless Enrollment Form clearly states:

- Lifeline is a **Federal Benefit**
- **One-Per-Household Rule**
- The definition of Household

- Customer information, including:
 - Name, address, last 4 SSN, DOB, billing address, permanent or temporary address, email, and contact phone #

- Program based eligibility benefits

- **Proof of eligibility is required, with matching name to applicant.**

FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES

WIRELESS
This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

A Lifeline Product

IMPORTANT INFORMATION ABOUT THE LIFELINE PROGRAM

- The Lifeline Program is a federal benefit.
- Lifeline service is only available for one line per household. A household cannot receive benefits from multiple providers.
- A household is defined, for the purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

SECTION 1 – ENTER YOUR PERSONAL INFORMATION HERE

Please PRINT your information below (*applications with missing information will not be processed*):

RESIDENTIAL ADDRESS (CANNOT BE P.O. BOX):

First Name: _____ MI: _____ Last Name: _____
 Last 4 Digits of Social Security #: _____ Date of Birth: Month ____ Day ____ Year ____
 Address: _____ Apt #/Unit #: _____
 City: _____ State: _____ Zip Code: _____ Email Address: _____

This address is (check one): Permanent Temporary Multi-Household Contact Phone #: _____

****Initial Here** I will validate this address with Care Wireless every 90 days until I obtain a permanent address.

BILLING ADDRESS (if different than above):

Address: _____ Apt #/Unit #: _____
 City: _____ State: _____ Zip Code: _____

If you previously selected that your residential address is a temporary address you are required to re-verify every 90 days that you continue to rely on that address. Failure to respond to address verification attempts within 30 days will result in de-enrollment from the Lifeline program.

If you should move, you must notify Care Wireless within 30 days of moving. You may not use a post office box as your residential address.

SECTION 2a Use this section only if you qualify based on participating in the following programs:

SKIP TO SECTION 2b IF YOU QUALIFY BASED ON INCOME LEVEL

Initial Here I hereby certify under penalty of perjury that I participate in at least one of the following programs (check all that apply):

<input type="checkbox"/> SNAP / Food Stamps / WIC	<input type="checkbox"/> Federal Public Housing Assistance / Section 8
<input type="checkbox"/> Medicaid	<input type="checkbox"/> Supplemental Security Income / SSI
<input type="checkbox"/> National School Free Lunch Program	<input type="checkbox"/> Temporary Assistance to Needy Families / TANF
<input type="checkbox"/> Bureau of Indian Affairs	<input type="checkbox"/> Low Income Home Energy Assistance Program / LIHEAP

You must send a COPY of any current document that proves your participation in one of the programs previously selected. All documents must have the same name and address as provided in this application.

Skip to Section 3 if you selected one of the programs above.

Only one phone per household address allowed regardless of how many government assisted recipients reside at the address. All enrollment forms must have all sections completed, this includes last 4 numbers of the social security number, date of birth, and R must be signed and dated. **Applications with missing information will not be processed.** There are absolutely no exceptions. Please allow 1-2 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless, PO Box 1109, Bridgeview, IL 60455. Certain restrictions apply. Phone models vary by availability. Service varies by coverage area.

Lifeline Offering Advertising Compliance Cont.



WIRELESS
A Lifeline Product

FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES

This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

SECTION 2b Use this section only if you qualify based on your household income level.

Income Qualification:
Check this box if your household income is at or below 135% of national poverty level qualifies for Lifeline credit.

There are individuals in my household.
(Enter the number of people residing in your household)

# Persons in Household	1	2	3	4	5
135% Annual Income (at or below)	\$15,080	\$20,426	\$25,772	\$31,118	\$36,464
Add \$5,346 for each additional person.					

TO QUALIFY BASED ON YOUR INCOME, YOU MUST PROVIDE COPIES OF ONE OR MORE OF THE DOCUMENTS LISTED BELOW. IF YOU PROVIDE DOCUMENTATION THAT DOES NOT COVER A FULL YEAR (SUCH AS CURRENT PAY STUBS), YOU MUST SUBMIT THREE (3) CONSECUTIVE MONTHS OF THE SAME TYPE OF DOCUMENT WITHIN THE PREVIOUS 12 MONTHS:

- Current income statement from employer or paycheck stub
- Social Security benefits statement
- Unemployment/Workers Compensation benefits statement
- Divorce decree or child support document
- Retirement/Pension benefit statement
- Veterans Administration benefits statement
- Prior year's state, federal or tribal tax return

I certify under penalty of perjury that my household income is at or below 135% of the Federal Poverty Guidelines (FPG)

(Note: Proof of income qualification not required during annual re-verification of Lifeline eligibility.)

Care Wireless is a Lifeline supported service. Lifeline is a federal benefit, and only eligible subscribers may enroll. Customers 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. Lifeline is available for only one line per household. A household is defined as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. Violation of the one-per-household rule constitutes a violation of FCC rules, and will result in the Customer's de-enrollment from Lifeline. Lifeline is a non-transferable benefit, and a Customer may not transfer his or her benefit to another person.

Referred By:

Were you referred by a friend or family member?

Customer's First Name Customer's Last Name Care Wireless Phone Number

Only one phone per household address allowed regardless of how many government assisted residents reside at the address. All enrollment forms must have all sections completed, this includes but is not limited to: date of birth, and it must be signed and dated. Income tax forms will not be accepted. There are a number of exceptions. Please allow 1-2 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless, PO Box 1108, Bridgeview, IL 60435. Certain restrictions apply. Phone models vary by availability. Service varies by coverage area.

Care Wireless Enrollment Form clearly states:

• Income Eligibility requirements and disclosures

• Care Wireless Lifeline disclosure

Lifeline Offering Advertising Compliance Cont.



Care Wireless Enrollment Form clearly states:

- Customer acknowledgements in order to qualify to receive Lifeline benefits, including penalty of perjury language

Applicant signature page and submission options on separate page, including reminder to submit required eligibility documentation.

FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES
 This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

SECTION 3 - INITIAL EACH BOX BELOW

I certify under penalty of perjury to each of the following (Initial each box):

- 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 meet the eligibility requirements of the program(s) checked above, or have an annual household income at or below 135% of the Federal Poverty Guidelines
- 3) I am not listed as a dependent on another person's tax return (unless over the age of 60)
- 4) I have provided documentation of eligibility.
- 5) I understand that I and my household can only have one Lifeline-supported telephone service. Care 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
- 6) 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.
- 7) I understand that my Care Wireless Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- 8) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period during which I may use the service or contact Care Wireless to confirm that I want to continue receiving service.
- 9) I will notify Care 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 Care Wireless if:
 - a) I cease to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines;
 - b) I am receiving more than one Lifeline supported service;
 - c) I no longer satisfy the criteria for receiving Lifeline support.
- 10) I will notify Care 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 Care Wireless every ninety (90) days. If I fail to respond to Care Wireless' verification attempts within thirty (30) days, my Care Wireless Lifeline service may be terminated.
- 11) Care Wireless has explained to me that I may be required to re-certify my continued eligibility for Lifeline at any time. If I fail to do so within thirty (30) days, it will result in termination of my Care Wireless Lifeline service.
- 12) I understand, and consent to the fact that my name, telephone number, and address will be provided to the Universal Service Administrative Company, the administrator of the Lifeline program, and/or its agents, for the purpose of verifying that I do not receive more than one Lifeline benefit.
- 13) I authorize Care Wireless to access any records required to verify my statements on this form and to confirm my eligibility. I give permission to the duly authorized official(s) administering the above programs to provide to Care Wireless my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by Care Wireless as confidential customer account information.

Penalty of Perjury
 Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

BY LAW THE LIFELINE PROGRAM IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, WHETHER LANDLINE OR WIRELESS, NO EXCEPTIONS

Only one phone per household address allowed regardless of how many government assisted recipients reside at the address. All enrollment forms must have all sections completed. This includes last 4 numbers of the social security number, date of birth, and it must be signed and dated. Income tax forms will not be processed. There are absolutely no exceptions. Please allow 2-3 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless, PO Box 1109, Bridgeview, IL 60455. Certain restrictions apply. Please make sure by availability. Service varies by coverage area.

Preventing Waste, Fraud, Abuse



Internal application used for determining applicant eligibility and approving/denying enrollments.

The screenshot shows the 'Enrollment Details' interface. On the left, a sidebar contains navigation options: Config, Enrollee Info, Dealer Info., Qualifiers, Validations, Acknowledgements, and Documents (selected). Below these are 'Overall Status' indicators for Address, Terms Ack, Qualifiers, Documents, and Overall, all marked with checkmarks. The main area features a table with columns: Doc Type, Status, Status On, Status By, Mime Type, and Deliver Method. A single row is visible with values: SSI, APPROVED, 08/29/2012 12:22:46, szambr, JPEG, and UPLOAD. To the right of the table is a 'With Selected Save' menu containing buttons for Process, Purge, Update Info, Update Status, Approve Selection, Add/View Comments, CSA Coverage, and Manage Locks. At the bottom, there are buttons for Add, Upload through web interfac, Supplemental Security Incom, View, Approve, Purge, and Deny. Numbered callouts 1 through 6 are placed around the interface to highlight specific areas.

- 1 All application sections reviewed
- 2 Must be all green to proceed with enrollment
- 3 Wireless coverage confirmed
- 4 Submission for approval
- 5 Incomplete or dormant applications are purged
- 6 Complete and approved are submitted for processing and phone shipment

Preventing Waste, Fraud, Abuse

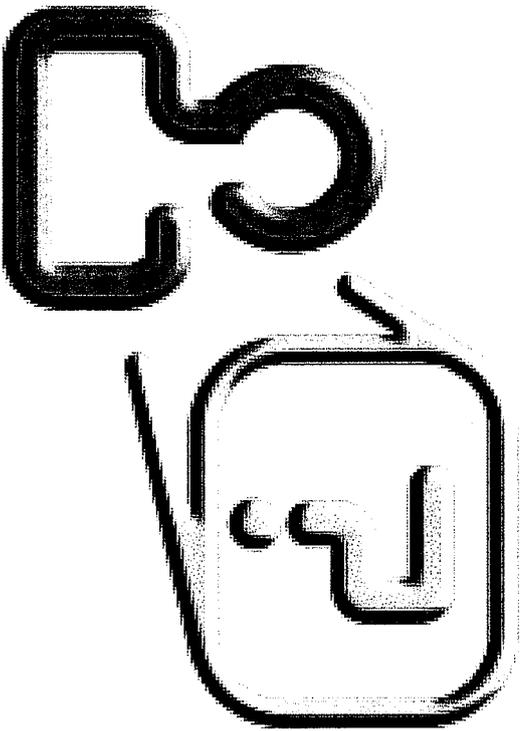


Automated Enrollment Log

1	Enrollment Log - Enrollee Id [REDACTED]
2	oernes New PENDING enrollment on 16-AUG-12 by oernes oernes Enrollment qualifier (PROGRAM:SNAP / WIC / Food Stamps) added on 16-AUG-12 by oernes
3	oernes Enrollment verification status for 2012 updated to APPROVED on 17-AUG-12 by oernes
4	oernes Document Submitted Type: Letter/Voucher Ident: from (SNAP / WIC / Food Stamps) oernes Submit Type: Fax/Mail
5	oernes All qualifiers and overall enrollment status () 'APPROVED' on 17-AUG-12 by oernes dheath Enrollee assigned Ptel account id [REDACTED] on 17-AUG-12 by dheath

1. Enrollment Log for all new enrollments (regardless of status)
2. Log information for entering agent/representative
3. Log information for approving user
4. Log information regarding document submitted
5. Processing of phone activation

Q & A



THANK YOU



A Lifeline Product