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

In the Matter of the	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
	)	
PlatinumTel Communications LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)	)	

PLATINUMTEL COMMUNICATIONS LLC'S REVISED COMPLIANCE PLAN

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Table of Contents

I. Introduction……...2

A. Company Background……...2

B. PlatinumTel Forbearance Order……2

II. PlatinumTel will provide Lifeline ETC services pursuant to the conditions contained in the PlatinumTel Forbearance Order and the Commission's Lifeline and Link Up Reform and Modernization Order…….5

A. PlatinumTel Commits to Provide Access to 911 and E911 Services……5

B. E911-Compliant Handsets…….5

C. PlatinumTel will Comply with the Obligations Related to the Commission's Forbearance of the Own Facilities Requirement……...6

1. Enrollment Procedures……...6

2. Procedures for Submitting for Reimbursement from USAC……...12

3. Ongoing Verification……13

III. Additional Measures to Prevent Waste, Fraud, and Abuse…….16

A. Non-usage Policy…….16

B. Customer Education with Respect to Duplicates…….17

C. Cooperation with state and federal regulators……..19

D. Sample Marketing Materials……20

IV. Description of how PlatinumTel will Offer Service……20

A. Geographic Area of PlatinumTel's Service…….23

B. Description of Lifeline Service Plan Offerings……...23

C. Other Certifications Required by 47 C.F.R. § 54.202…….24

V. PlatinumTel has the Financial and Technical Ability to Provide Lifeline Supported Services……..25

VI. PlatinumTel will Comply with the Commission's Reporting Requirements……..26

VII. PlatinumTel will Comply with the Commission's Recordkeeping Requirements…….26

VIII. Conclusion……...27

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PLATINUMTEL COMMUNICATIONS LLC'S REVISED COMPLIANCE PLAN

PlatinumTel Communications, LLC ("PlatinumTel" or "Company"), by its attorney, hereby files this Revised Compliance Plan outlining the measures it will take to implement the conditions imposed by the Federal Communications Commission ("FCC" or "Commission") in its recent Orders released on September 23, 2011[1] and on February 6, 2012[2] in the above-captioned proceeding.[3]

PlatinumTel has incorporated in its marketing materials for its Lifeline services, in clear, easily understood language, the various disclosures required by 47 C.F.R. § 54.405. PlatinumTel has attached its marketing materials incorporating these disclosures. PlatinumTel concurs with the Commission's policy to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, PlatinumTel has implemented procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual. These measures include practices intended

[1] *In the Matter of PlatinumTel LLC Petition for Forbearanc*e, Order, FCC 11-139, (released September 23, 2011) ("*Forbearance Order*").
[2] *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) ("*Lifeline and Link Up Reform and Modernization Order")*
[3] This Revised Compliance Plan is intended to replace the earlier versions filed by PlatinumTel on November 8, 2011 and on April 23, 2012.

to: (1) prevent duplicates within PlatinumTel's subscriber base; (2) avoid reimbursement for any subscriber until the subscriber activates service; (3) cease reimbursement for subscribers who fail to use the service for a 60-day period; (4) ensure that only qualifying individuals demonstrating proof of eligibility are enrolled to receive Lifeline service; and (5) ensure that PlatinumTel provides only one Lifeline service per household. As indicted below, PlatinumTel's practices and procedures comply with the Commission's applicable Lifeline regulations and orders, and PlatinumTel commits to continuing these practices going forward. PlatinumTel respectfully requests expeditious approval of its pending Petition for Designation as an Eligible Telecommunications Carrier and this Amended Compliance Plan.

I. Introduction

A. Company Background

PlatinumTel Communications, LLC ("PlatinumTel") has been providing prepaid wireless telecommunications services to low income consumers throughout the United States since 2001, making it one of the earliest pioneers in prepaid wireless. Today the Company serves customers in 48 states. In 2009 PlatinumTel was certified as an ETC in Illinois. PlatinumTel operates through a combination of resale throughout its service area as well as facilities that it owns in Illinois. In Illinois, PlatinumTel currently provides Lifeline services under the service name Care Wireless.[4]

B. PlatinumTel Forbearance Order

The Commission's *Forbearance Order* conditionally granted PlatinumTel's request for forbearance from the Section 214(e)(1)(A) requirement that a carrier designated as an ETC for purposes of federal universal service support provide services, at least in part, over its own

[4] PlatinumTel will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

facilities, stating PlatinumTel may seek ETC designation to offer discounted services to qualified low-income consumers through the universal service Lifeline program.[5]

The Commission's grant of forbearance is subject to the following conditions: (a) PlatinumTel providing its Lifeline customers with 911 and Enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (b) PlatinumTel providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) PlatinumTel complying with conditions (a) and (b) as of the date it provides Lifeline service; and (d) PlatinumTel obtaining a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met[6]; (e) PlatinumTel requiring each customer to self-certify under penalty of perjury at the time of enrollment and annually thereafter until a national duplicates database is in place that he or she is the head of household and receives Lifeline-supported service only from PlatinumTel and does not receive Lifeline-supported service from any other provider; (f) PlatinumTel requiring each eligible Lifeline consumer at the time of enrollment to initial on the certification form that to the best of his or her knowledge he or she is not receiving Lifeline service from any other Lifeline provider and listing as examples the brand names of at least the leading wireline and leading two wireless Lifeline providers in the area to ensure the customer understands what is meant by Lifeline-supported service; (g) PlatinumTel making available state-specific subscriber data, including name and address of Lifeline subscribers, to USAC and each state PUC where it operates to determine

[5] *Forbearance Order* at ¶1.

[6] This obligation was revised in the Commission's *Lifeline and Link Up Reform and Modernization Order* at paragraphs 375 and 383. PlatinumTel agrees to abide by any state-specific obligations to obtain either a certification from each PSAP where it plans to offer service, or a self-certification, confirming that it provides its subscribers with 911 and E911 access.

whether an existing Lifeline subscriber receives Lifeline service from another carrier; (h) assisting the Commission, USAC, state commissions and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including providing upon request, the necessary information to detect and resolve duplicative Lifeline claims; (i) PlatinumTel establishing safeguards to prevent its customers from receiving multiple Lifeline subsidies at the same address and preventing individual subscribers from receiving more than one Lifeline discount; (j) PlatinumTel implementing a non-usage policy, if applicable, in states where PlatinumTel provides service at no monthly charge, requiring PlatinumTel to identify subscribers that have not used Lifeline service for 60 days and not seek support for such subscribers if they do not use the Lifeline service during a 30 day grace period; (k) PlatinumTel dealing directly with the customer to certify and verify the customer's Lifeline eligibility; (l) PlatinumTel explaining in prominent, plain, easily comprehensible language to all existing and new or potential subscribers that no consumer is permitted to receive more than one Lifeline subsidy; (m) PlatinumTel ensuring that all marketing materials for the service make clear that it is a Lifeline-supported service; (n) PlatinumTel immediately de-enrolling any subscriber who PlatinumTel knows is receiving Lifeline-supported service from another ETC or knows is no longer eligible; and (o) PlatinumTel providing a detailed description of its various Lifeline plans, including rates, number of minutes included and types of plans available.[7] The Commission required PlatinumTel to submit a plan describing the measures it would take to implement each one of these conditions within 30 days of the release of the Order.[8]

[7] *See Forbearance Order* at ¶¶ 11, 17.
[8] *See Id.* at ¶¶ 17.

II. PlatinumTel will provide Lifeline ETC services pursuant to the conditions contained in the PlatinumTel Forbearance Order and the Commission's Lifeline and Link Up Reform and Modernization Order.

A. PlatinumTel Commits to Provide Access to 911 and E911 Services.

PlatinumTel will provide all of its Lifeline subscribers with access to emergency calling services at the time the Lifeline service is initiated. Such 911 and E911 access will be available from PlatinumTel handsets regardless of the status of the subscriber account or the airtime balance associated with the handset. The Company's current practice provides access to 911 and E911 service to the extent that these services have been deployed by its underlying carrier, Sprint Nextel Corporation ("Sprint"). Under current practice, access to such emergency services is still made available to subscribers whether their account is active, suspended, terminated, or has reached the minimum required airtime balance.

Paragraphs 373-75 of the *Lifeline and Link Up Reform and Modernization Order* provided further guidance regarding access to 911 and E911 services. PlatinumTel further agrees to abide by any state-specific obligations to obtain either a certification from each PSAP where it plans to offer service, or a self-certification, confirming that it provides its subscribers with 911 and E911 access.[9]

B. E911-Compliant Handsets

PlatinumTel will ensure that all handsets shipped to Lifeline service subscribers will be E911-compliant. The Company's current lineup of mobile devices are all 911 and E911-Complaint. PlatinumTel will provide all of its Lifeline subscribers with 911 and E911 access from PlatinumTel handsets regardless of the status of the subscriber account or the airtime

[9] *Lifeline and Link Up Reform and Modernization Order* at ¶¶375, 383. PlatinumTel will obtain such certifications based on individual state-specific obligations.

balance associated with the handset.[10] In the event that an existing subscriber has a noncompliant handset, the Company will immediately replace such device with an E911-Compliant handset at no additional charge to the subscriber.

C. PlatinumTel will Comply with the Obligations Related to the Commission's Forbearance of the Own Facilities Requirement.

Paragraph 379 of the *Lifeline and Link Up Reform and Modernization Order* contains obligations related to the FCC's blanket forbearance of the "own facilities" requirement for Lifeline-only ETCs and the implementation of the terms and conditions of the Order.[11]

1. Enrollment Procedures

PlatinumTel will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting PlatinumTel in person or via telephone, facsimile, or the Internet. Consumers will be provided with printed information describing PlatinumTel's Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to PlatinumTel's website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. Applicants are required to provide PlatinumTel with documents demonstrating their eligibility based on the qualifying program they selected.

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[10] See *Lifeline and Link Up Reform and Modernization Order* at ¶373.

[11] PlatinumTel is a facilities-based wireless carrier in Illinois, where it maintains its own switches and routers for handling voice telephony services. However, given that the *Lifeline and Link Up Reform and Modernization Order* alters the obligation for facilities on a prospective basis, PlatinumTel requests that the FCC's forbearance authority (if it did not do so already) include PlatinumTel's operation in Illinois, in addition to operations in all other states in which it does business.

PlatinumTel's application form for its Care Wireless service will clearly identify that it is a "Lifeline" application. PlatinumTel will have direct contact with all customers applying for Lifeline service, either in person through its employees or authorized locations, via the company's website, via the telephone (including facsimile) or mail. PlatinumTel will provide Lifeline-specific training to all personnel, whether employees or authorized locations, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. PlatinumTel will ensure that all required documentation is taken care of properly by using state-specific compliance checklists. For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate.

The applicant will also be required to authorize Care Wireless to transmit subscriber information required for the administration of the Lifeline credit program, including to USAC to be used in a Lifeline program database.[12]

Pursuant to the *Lifeline and Link Up Reform and Modernization Order* PlatinumTel's certification form will also "explain in plain, easily comprehensible language that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line 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; and (4) a household is not permitted to receive Lifeline benefits from multiple providers".[13]

Upon enrollment, PlatinumTel will inform consumers about the annual re-certification requirement on the certification form.[14] Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility

[12] See Section 54.404(b)(9).
[13] *Lifeline and Link Up Reform and Modernization Order* at ¶121.
[14] See Id. at ¶145.

requirements—including a statement to the effect that to the best of his or her knowledge, the applicant is not receiving Lifeline-supported service from any other Lifeline provider. Penalties for perjury will be clearly-stated on the certification form. The certification form will also contain language stating that violation of the one-per-household requirement constitutes a violation of the Commission's rules and will result in the consumer's de-enrollment from the program, and could result in criminal prosecution by the United States government.[15]

In accordance with the *Lifeline and Link Up Reform and Modernization Order*, PlatinumTel will obtain the consumer's residential address (post office boxes and general delivery mailboxes are not accepted), which the consumer must indicate is his or her permanent address, temporary address, or a multi-household residence, and a billing address for the service (if the consumer's billing address differs from his or her residential address).[16] A consumer who lacks a permanent residential address must provide a temporary residential service address or other address identifying information that could be used to perform a check for duplicative support. For applicants that use a temporary address, the applicant will be required to verify every 90 days that the subscriber continues to rely on that address.[17] If the applicant does not respond to address verification attempts within 30 days, the subscriber will be de-enrolled from Lifeline service.[18] The application form will also clearly state that Lifeline participants must provide their new address to the Company within 30 days of moving[19] or they will be de-enrolled from the Lifeline program. Applicants who select "Multi-Household" are required to complete

[15] Id. at ¶121.
[16] Id. at ¶85.
[17] See 47 CFR 54.410(d)(3)(iv). See also 47 CFR 54.410(g), a requirement that is not yet effective. Notice of Office of Management and Budget Action dated April 13, 2012 ("Information collection request updated to remove the following information collections from this request: the temporary address confirmation and recertification (47 C.F.R. § 54.410(g) and the portion of 47 C.F.R § 54.405(e)(4) relating to temporary address de-enrollment) and the biennial audit requirement (47 C.F.R. § 54.420(a)). FCC may re-submit these removed collections for OMB review at a later date after further consideration.")
[18] *Lifeline and Link Up Reform and Modernization Order* at Appendix C.
[19] Id. at ¶¶85, 117.

the "Lifeline Household Worksheet" (see Exhibit A) as defined by the Universal Service Administrative Corporation ("USAC") to demonstrate whether there is a single or multiple households at the address provided. PlatinumTel further agrees to comply with all other updated Commission enrollment rules.[20]

The *Lifeline and Link Up Reform and Modernization Order* confirmed that the Commission will transition to a governmental database in order to confirm the initial and continued eligibility of a lifeline customer. The Order stated:

> As explained above, we conclude that establishing a fully automated means for verifying consumers' initial and ongoing Lifeline eligibility from governmental data sources would both improve the accuracy of eligibility determinations and ensure that only eligible consumers receive Lifeline benefits, and reduce burdens on consumers as well as ETCs. . . . We therefore direct the Bureau and USAC to take all necessary actions so that, as soon as possible and no later than the end of 2013, there will be an automated means to determine Lifeline eligibility for, at a minimum, the three most common programs through which consumers qualify for Lifeline.[21]

However, until the database is operational, PlatinumTel will continue to abide by its established enrollment procedures.

PlatinumTel will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws.[22] Pursuant to the *Lifeline and Link Up Reform and Modernization Order*, PlatinumTel will not retain copies of proof documentation, but rather will maintain accurate records detailing how the consumer demonstrated his or her eligibility.[23]

PlatinumTel's Lifeline application form (Exhibit B) includes a certification section where the applicant must attest and sign under penalty of perjury that the applicant's representations are

[20] See *Id.* at ¶60 and Appendix C.
[21] Id. at ¶403.
[22] Id. at ¶168.
[23] Id. at ¶101.

true and correct. Applicants will also be required to certify under penalty of perjury that that they only receive one Lifeline-supported service per household. Penalties for perjury will be clearly-stated on the certification form, as required by the Order. PlatinumTel will use substantially the following form of its certification, printed in at least 10 point font. PlatinumTel will also ensure the customer acknowledgements reflect any state-specific disclosures as required by each state, in addition to the standard disclosures. PlatinumTel will require applicants to initial each of the following acknowledgements:

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 Unites 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, address, date of birth, last four digits of my social security number, dates of service initiation and/or termination, and qualifying basis for Lifeline service 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 lay, 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

In order to further the Commission's goal of eliminating waste, fraud, and abuse, PlatinumTel takes multiple steps to eliminate duplicate enrollments, and fraudulent applications.

Applications entered from all channels go into PlatinumTel's database and go through the following checks to validate that the application should be processed:

1. Address is sanitized and validated using the United States Postal Service ("USPS") Address Matching System ("AMS");

2. Address is checked in PlatinumTel's database against:

a. Flagged addresses that are known to be fraudulent and/or known not to be eligible;

b. Existing enrollments for duplicate addresses (pending and approved);

3. Customer's full name and last four (4) digits of their social security number are compared in the database against existing and flagged enrollments. PlatinumTel uses multiple search methods to compare the data to include nicknames and abbreviations of names;

   NOTE: When available, PlatinumTel will submit the applicant's information to a state database and/or the National Lifeline Accountability Database to determine the applicant's eligibility.

4. Customer's proof of benefits are compared with the information submitted on the application to confirm a match. Once the proof document has been reviewed and recorded in the database, the physical document is destroyed. PlatinumTel records the type of document submitted, associated program, date on the document, the date the document is submitted, and the username of the associate responsible for review of the document, all of which is stored in the PlatinumTel database.

5. Customer is informed of all of the terms and disclosures they are required to accept in order to proceed.

6. Upon acceptance of the disclosures and terms, the application is submitted for approval and processing. All customer acknowledgements are stored in the database as part of the customer's enrollment record.

2. Procedures for Submitting for Reimbursement from USAC

PlatinumTel agrees to comply with all certification requirements contained in the *Lifeline and Link Up Reform and Modernization Order* and outlined in 47 CFR 54.407 when submitting for reimbursements from USAC.[24] As part of each reimbursement request PlatinumTel will certify that it is in compliance with all of the Commission's Lifeline rules, and to the extent

[24] See, for example, *Lifeline and Link Up Reform and Modernization Order* at ¶¶125-28.

required, has obtained valid application/certification and verification for each of its subscribers subject to the request for reimbursement.[25] PlatinumTel will also transition the submission of its Form 497s to the eighth day of each month in order to be reimbursed in the same month, and inform USAC, to the extent necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.[26] Finally, PlatinumTel will maintain accurate records as directed by USAC and as required by Section 54.417 of the Commission's rules.

3. Ongoing Verification

The *Lifeline and Link Up Reform and Modernization Order* described the initial and annual verification procedures at paragraphs 120-148 and in Appendix C. Since beginning to offer Lifeline service in Illinois, PlatinumTel has required every consumer enrolled in the Lifeline program to verify on an annual basis that (1) he or she receives Lifeline-supported service only from PlatinumTel; (2) to the best of his or her knowledge, no one else in the subscriber's household is receiving a Lifeline-supported service[27]; (3) the customer is still eligible to receive Lifeline benefits; and (4) the customer's information remains true and correct, and that if any of their information has changed, they will contact PlatinumTel to make the changes. Any customer that is found to not comply with the rules or that fails to respond to the annual recertification process will be de-enrolled.[28]

PlatinumTel will notify each participating Lifeline consumer sixty (60) days prior to the recertification deadline that they must confirm their continued eligibility in accordance with the applicable requirements. Such verifications will be required in order for the consumer to

[25] Id. at ¶128; 47 USC 54.407(d).
[26] *Lifeline and Link Up Reform and Modernization Order* at ¶¶302-306.
[27] *Id*. at ¶120.
[28] Id. at ¶122.

continue to receive free Lifeline service or to purchase prepaid airtime from PlatinumTel at the discounted rate only available to those customers who are enrolled in its Lifeline program. Customers are notified multiple times over the sixty (60) day period via a robocall system, SMS messages, emails (if available), and letters via USPS. PlatinumTel also keeps customers aware that annual re-verification is required by regularly reminding customers via posting on www.carewireless.com, when customers contact the enrollment center, when customers contact customer service, and via social networks like Facebook, Twitter and Pinterest. PlatinumTel provides multiple methods for customers to process their annual re-verification, including calling into the IVR, speaking with an enrollment representative, or online at carewireless.com. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact PlatinumTel to complete verification. If the customer does not respond by the sixtieth day, a termination letter is sent to the customer. Customers will have 30 days following the date of the termination letter to complete the form, certify under penalty of perjury that no one else in the household receives Lifeline service from another carrier and return the form to PlatinumTel by mail. If the subscriber does not respond within 30 days to the mailing and certify their continued eligibility, the subscriber will be removed from the Lifeline program within 5 days.

PlatinumTel will submit an annual certification to the USAC, signed by a Company officer under penalty of perjury, that PlatinumTel: (1) has policies and procedures in place to review consumer's proof of eligibility documentation and ensure that its Lifeline subscribers are eligible to receive Lifeline services;[29] (2) is in compliance with all federal Lifeline certification procedures;[30] and (3) has obtained a valid application/certification form for each subscriber for

[29] *Id*. at ¶126; 47 USC 54.416(a)(1).
[30] *Lifeline and Link Up Reform and Modernization Order* at *¶126; 47 USC 54.54.416(a)(2).*

whom PlatinumTel seeks Lifeline reimbursement.[31] Pursuant to the new rules, PlatinumTel will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013.[32] Where ongoing eligibility cannot be determined through access to a qualifying database either by the Company or the state, and there is no state administrator verifying the continued eligibility of Lifeline subscribers, the Company will re-certify the continued eligibility of all of its subscribers by contacting them, either in person, in writing, by phone (e.g., via IVR (Interactive Voice Response) System), by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.[33] In states where a state agency or a third party has implemented a database that carriers may query to re-certify the consumer's continued eligibility, the Company (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification.[34] The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact PlatinumTel.

PlatinumTel will provide the results of its annual recertifications/verifications to the Commission, the USAC, and to the applicable state public utility commissions.[35] PlatinumTel will annually report its Company name, names of its holding company, operating companies and affiliates, and any branding (such as a "d/b/a" or brand designation) as well as relevant universal service identifies for each entity by Study Area Code.[36] PlatinumTel will also report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service

[31] 47 USC 54.416(a)(3).
[32] *Lifeline and Link Up Reform and Modernization Order* at Appendix C.
[33] *See* Id.
[34] Id. at ¶131.
[35] Id. *at ¶¶132-148; 47 USC 54.416(b).*
[36] *Lifeline and Link Up Reform and Modernization Order* at ¶¶296, 390; 47 USC 54.422(a).

offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.[37] Finally, PlatinumTel will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that PlatinumTel is able to function in emergency situations.[38]

III. Additional Measures to Prevent Waste, Fraud, and Abuse

A. Non-usage Policy

PlatinumTel will implement a non-usage policy whereby we will identify Lifeline customers that have not used the Company's Lifeline service for sixty (60) days, and cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. PlatinumTel has implemented an automated notification system which monitors Lifeline customer usage and automatically sends a text message to customers when there is sixty (60) days of non-usage. Customers receive the following message, "FREE NOTICE: YOUR LIFELINE ACCOUNT MAY BE DISCONNECTED DUE TO NON-USAGE FOR 60 DAYS. UNUSED SERVICE FOR 60 DAYS WILL RESULT IN DE-ENROLLMENT. CALL 855-711-2222" Specifically, if no usage appears on a PlatinumTel Lifeline customer's account during any continuous sixty (60) day period, PlatinumTel will promptly notify the customer that the customer is no longer eligible for PlatinumTel Lifeline service subject to a 30-day grace period. During the 30-day grace period,

[37] *Lifeline and Link Up Reform and Modernization Order* at ¶390; 47 USC 54.422(b)(5).
[38] *Lifeline and Link Up Reform and Modernization Order* at ¶389; 47 USC 54.422(b)(1)-(4).

the customer's account will remain active, but PlatinumTel will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, sending a text message and/or adding money to the account), PlatinumTel will deactivate Lifeline services for that customer. In addition, PlatinumTel will not seek to recover a Federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

B. Customer Education with Respect to Duplicates

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, PlatinumTel has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

a) Call Center Scripts – PlatinumTel will emphasize the "one Lifeline phone per household" restriction through its interaction with the potential customer at the call center. (see Exhibit C)

b) Marketing, Advertising and Website Content – PlatinumTel, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. The following statement will appear in conspicuous place in bold font in an offsetting color, minimum 10 point font, to ensure it is not overlooked. (see Exhibits D-1 & D-2)

> ***Note: By law, the Lifeline program is only available for one phone per household.***
>
> This statement will also appear on the company's website (www.carewireless.com) during the customer information/education cycle. At the point on its website when a customer inputs his/her zip code to verify that Care

> Wireless/PlatinumTel offers service in their area, PlatinumTel would display the above message in the section where the website explains the service.

Throughout all advertising and marketing material, (1) PlatinumTel clearly identifies the service as a "Lifeline Product"; (2) that By law, the lifeline program is only available for one phone per household; and (3) that customers are required to provide documents demonstrating proof of eligibility (when a state database is not available).

All PlatinumTel personnel assigned to the Care Wireless Lifeline department undergo rigorous training to ensure their understanding of the program, (1) what is required of the applicants; (2) what is required of them; and (3) most importantly, the no tolerance policy regarding waste, fraud, and abuse. Supervisory staff actively monitors agents as they work with applicants to ensure their compliance, as well as making themselves available to answer any customers' questions. Ongoing training for supervisors and staff is conducted monthly by management to review existing procedures, find ways to streamline regulatory compliance processes, address new concerns, and train on new policies issued by the Commission.
PlatinumTel has tailored its internal policies to reflect the goal of eliminated waste, fraud, and abuse. Regulatory and supervisory staff is also required to monitor any new policies issued by the FCC and USAC to ensure immediate adherence and re-training of staff. Staff for events at authorized locations also receive specialized ongoing training and management in order to maintain the strictest observance of Lifeline policies. Event staff and authorized location staff are assigned dedicated personnel that monitor all enrollments and applications using PlatinumTel's proprietary systems (See Exhibit E).

PlatinumTel also takes great pride in its IT group's ability to make sure that all internal and external systems reflect the policies as set by the Commission. The PlatinumTel IT Group has created many proprietary systems, some of which include the ability to process applications

from multiple sources, handle duplicative searches within the database (with the ability to connect to outside database sources when available), automatically notify customers of their upcoming annual re-verification, and automatically de-enroll subscribers who fail to re-verify or due to the sixty (60) day non-usage policy. By creating these systems internally, PlatinumTel is able to easily and quickly modify the system as the Commission defines the rules necessary to eliminate waste, fraud, and abuse.

C. Cooperation with state and federal regulators

PlatinumTel has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Providing state commissions (PUC), the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, PlatinumTel agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;

- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;

- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if PlatinumTel's investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that PlatinumTel's Lifeline service should be discontinued such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and Order (Section III, B.).

- Report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[39]

[39] *Id*. at ¶257; 47 USC 54.405(e)(3).

D. Sample Marketing Materials

PlatinumTel will market is Lifeline plans, containing its own ETC name[40], Care Wireless, through various media, including through personal contact, print and television advertisements. PlatinumTel will incorporate into its Lifeline marketing materials in clear, easily understood language that: (i) the service is supported by Lifeline, a government program; (ii) only eligible consumers may enroll in the program; (iii) specific documentation is necessary for enrollment; and (iv) the benefit is limited to one per household and is no-transferrable.[41]

PlatinumTel marketing materials will reinforce the Commission's rules with respect to the prevention of waste, fraud and abuse. To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, PlatinumTel has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

The following attached exhibits are related to PlatinumTel's customer marketing. A copy of PlatinumTel's Lifeline Application Form is attached as Exhibit B. Exhibit C is the call center script to be used during telephonic customer contacts. Exhibit D-1 contains a sample of PlatinumTel's marketing material. Finally, exhibit D-2 is an additional PlatinumTel sample marketing brochure.

IV. Description of how PlatinumTel will Offer Service

As one of the oldest prepaid providers in the U.S., PlatinumTel has been a leader in prepaid wireless by offering consumers an affordable product and by making prepaid wireless easy to understand. PlatinumTel's many achievements include innovations that have become

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[40] *Lifeline and Link Up Reform and Modernization Order* at ¶275; 47 C.F.R. §54.405(d).
[41] *Lifeline and Link Up Reform and Modernization Order* at ¶275; 47 C.F.R. §54.405(c).

industry standards, including, (1) in 2002 developing the first online activation and customer management portal allowing customers and retailers alike the ability to not only buy online, but also purchase airtime, and manage their accounts; (2) in 2001 being the first prepaid wireless carrier to offer prepaid customers with a $10 top-up option; and (3) offering customers the most affordable pay-as-you-go wireless service in the U.S. in 2011. This innovation has helped PlatinumTel grow and be one of the strongest prepaid wireless carriers in the industry. It also translates to providing Lifeline customers with a better overall experience ensuring their understanding of the Lifeline program, giving them access to find the assistance when needed, and the comfort in knowing they are being serviced by an industry leader, pioneer and veteran.

PlatinumTel has been providing prepaid wireless service to customers from lower income backgrounds that generally do not have wireless service because of economic constraints, poor credit history or an inability to enter into a long-term contract since 2001, making it one of the earliest pioneers in prepaid wireless. PlatinumTel does not impose credit checks or long-term service contracts as a prerequisite to obtaining service. Prepaid wireless services have become essential for lower-income customers, providing them with affordable wireless access, including access to emergency services and a reliable means of accessing contacts for family, prospective employers or social services agencies.

PlatinumTel has extensive outreach efforts to providers of social services to low income people in Illinois. The company has outreach programs with numerous churches, non-profit, and community organizations. These organizations assist low income consumers in finding and applying for the appropriate government benefit for their situation. By establishing these partnerships, PlatinumTel is able to educate consumers of the Lifeline program, identify and enroll truly eligible consumers, and create long-lasting community ties. These efforts also reflect

PlatinumTel's dedication to reducing waste, fraud and abuse, by aligning with organizations that work with qualified consumers. PlatinumTel believes that this type of community outreach is vital to the success of the Lifeline Program, as it is an effective means of informing consumers about the benefits, and is a great supplement to traditional marketing efforts.

PlatinumTel provides prepaid wireless telecommunications services to consumers by reselling the services of Sprint PCS, which provides wholesale capacity to wireless resellers. Sprint PCS will provide PlatinumTel with the network infrastructure and wireless transmission facilities, allowing PlatinumTel to operate as a Mobile Virtual Network Operator ("MVNO"). As an MVNO, PlatinumTel purchases wireless services from the underlying carrier on a wholesale basis for calling, text messaging, broadband and resells those services to customers using its own brand. PlatinumTel's value proposition enables customers to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly packages of minutes in advance.

In Illinois, PlatinumTel operates, manages and markets all aspects of the customer experience, including in-house U.S. based customer service, 411 directory assistance, international calling, IT services, pricing, the PlatinumTel website, handset procurement, handset logistics, handset selection, service offerings, entertainment applications and marketing materials. PlatinumTel began offering Lifeline services in Illinois in March 2011. The company's Lifeline package includes not only a free phone, but more minutes and cheaper text messaging rates than other prepaid wireless Lifeline providers. With respect to its handset, PlatinumTel provides a semi-activated handset to its customers. Upon delivering the handset, the customer must activate the service by making an outbound call.

For the last two years PlatinumTel has offered the lowest cost pay-as-you-go wireless services to consumers in the United States. PlatinumTel subscribers may easily de-enroll from Lifeline or disconnect their service altogether. Subscribers can de-enroll at any time by calling the Care Wireless toll free customer service line at 1-855-711-2222.

A. Geographic Area of PlatinumTel's Service

PlatinumTel is currently certified as both a facilities based wireline and wireless ETC in Illinois for the non-rural areas of the Illinois Bell Telephone Company ("AT&T Illinois") territories. PlatinumTel has a pending Petition before this Commission for Eligible Telecommunications Carrier Designation for Low Income Support only for the non-rural areas of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia.[42] PlatinumTel expects to seek additional state Public Utility Commission ETC designations within the coming year.

B. Description of Lifeline Service Plan Offerings

PlatinumTel offers Lifeline customers three different rate plans. Two plans will be free to eligible subscribers, while one will have a monthly charge. PlatinumTel will offer the following three plans:

> 300 Free Minutes: This plan includes 300 free minutes added on the first day of the month. Unused minutes expire on the first day of the month when the account is replenished with the next month's 300 free minutes. If a subscriber runs out of minutes, they have the option to purchase additional airtime billed at $.05 per minute and $.02 per text message
>
> 150 Free Voice Minutes and 50 Free Text Messages: This plan includes 150 free voice minutes and 50 free text messages added on the first day of the month. Unused minutes and text messages carry over to the next month. If a subscriber runs out of minutes, they have the option to purchase additional airtime billed at $.05 per minute and $.02 per text message.

[42] *In the Matter of Telecommunications Carriers Eligible to Receive Universal Service Support, PlatinumTel Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, WC Docket No. 09-197 (Submitted August 5, 2011).

500 Talk and Text Credit: Subscribers can purchase the 500 voice minutes and 500 text message monthly bundle for $10. This plan normally costs $20.

In addition to free voice services, each PlatinumTel Lifeline plan includes a free handset and free customer calling features, including Caller Identification, Call Waiting, Call Forwarding, 3-Way Calling and Voicemail. All plans include domestic long distance at no extra per minute charge. Calls to emergency 9-1-1 are always free, irrespective of the status of service activation or availability of minutes.

C. **Other Certifications Required by 47 C.F.R. § 54.202**

The *Public Notice*[43] requires carriers to include certifications required under recently amended 47 C.F.R. § 54.202. PlatinumTel certifies that it does and will continue to comply with the service requirements applicable to the support it receives.[44] Specifically, PlatinumTel's Lifeline services: (i) include voice telephony services that provide voice grade access to the public switched network or its functional equivalent; (ii) provide subscribers with a defined number of minutes of usage for local service at no additional charges; (iii) provide subscribers with access to the emergency services provided by local government or other public safety organizations, such as 911/E911 to the extent the local government in PlatinumTel's service area has implemented 911/E911 systems; and (iv) toll limitation for qualifying low-income consumers.[45]

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[43] *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, DA 12-314 (WCB, rel. Feb. 29, 2012) ("*Public Notice*").
[44] 47 C.F.R. § 54.202(a)(1).
[45] PlatinumTel will meet the requirement to provide toll limitation to Lifeline subscribers by offering service on a prepaid, or pay-as-you-go, basis, as well as toll blocking for international calls. As the Commission found in its grant of ETC designation to Virgin Mobile, "the prepaid nature of [a prepaid wireless carrier's] service offering works as an effective toll control." *Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, 24 FCC Rcd 3381, 3394 at ¶ 34 (2009).

V. PlatinumTel has the Financial and Technical Ability to Provide Lifeline Supported Services.

Paragraph 388 of the *Lifeline and Link Up Reform and Modernization Order* updated the Commission's rules to ensure that Lifeline-only ETCs have the financial and technical ability to offer Lifeline-supported services. PlatinumTel's officers have extensive experience in the telecommunications industry. PlatinumTel's services include voice calling, text messaging, internet access, and broadband. PlatinumTel is certified to provide wireline and wireless telecommunications services in Illinois. The Company has been providing prepaid wireless services in Illinois since 2001. Today, PlatinumTel services prepaid customers nationally on a network that reaches over 270 million people. Additionally, PlatinumTel began providing wireless lifeline services in Illinois in March 2011. PlatinumTel has a strong IT team devoted to the development of unique business services and over the years has maintained a robust and profitable telecommunications operations. The success of PlatinumTel's business is due in large part to the continuity of its highly qualified management team with over 50 years of combined relevant experience. PlatinumTel is one of the oldest and largest prepaid wireless companies in the United States. The company is based in Justice, Illinois and has provided prepaid wireless services since 2001.

The company serves primarily residential consumers, most of who reside in urban and inner-city areas. Many of these consumers do not have bank accounts and have limited available funds to purchase communications services. In Illinois, PlatinumTel uses a combination of its own network facilities as well as reselling the services of Sprint PCS.

VI. PlatinumTel will Comply with the Commission's Reporting Requirements.

PlatinumTel agrees to annually report the names and identifiers used by PlatinumTel, its holding company, operating companies and affiliates.[46] Additionally, PlatinumTel agrees to provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline Plans for voice telephony service offered specifically for low income consumers through the program they offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.[47]

The *Lifeline and Link Up Reform and Modernization Order* contains audit requirements for carriers that draw five (5) million dollars or more from the low income program.[48] To the extent this requirement is approved, and PlatinumTel draws $5 million or more in the aggregate on an annual basis from the low income program, the Company will hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess PlatinumTel's overall compliance with the program's requirements.[49] PlatinumTel will comply with applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.

VII. PlatinumTel will Comply with the Commission's Recordkeeping Requirements.

PlatinumTel agrees to comply with the recordkeeping requirements outlined in the *Lifeline and Link Up Reform and Modernization Order*. Section 54.417 of the new rules requires all ETCs to "maintain records to document compliance with all Commission and state

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[46] See *Lifeline and Link Up Reform and Modernization Order* at ¶390.
[47] Id.
[48] Id. at ¶294. As of the date of filing this Compliance Plan, this audit requirement has not yet been approved pursuant to the Paperwork Reduction Act.
[49] *Lifeline and Link Up Reform and Modernization Order* at ¶291.

requirements governing the Lifeline and Linkup program for the three full preceding calendar years and to provide that documentation to the Commission or Administrator upon request."[50] Section 54.417 of the new rules also require all ETCs to "maintain the documentation required in §§54.410(d) (initial eligibility certification) and 54.410(f) (eligibility recertification) for as long as the subscriber receives Lifeline service from that ETC."[51] PlatinumTel will therefore maintain records pursuant to §§54.410(d) and 54.410(f) on all individual Lifeline accounts that will be stored for as long as the account is active and for a minimum of three years after the account has been terminated.

VIII. Conclusion

PlatinumTel respectfully submits that this Revised Compliance Plan fully satisfies the conditions set forth in the *Lifeline and Link Up Reform and Modernization Order* and the Commission's Lifeline rules. Accordingly, PlatinumTel respectfully requests expeditious approval of this Revised Compliance Plan and its related pending ETC Petition in order that PlatinumTel may continue to provide Lifeline service to eligible low-income subscribers in Illinois and expand its Lifeline offering to other eligible customers.

Respectfully submitted,

s/ Thomas H. Rowland

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[50] 47 CFR 54.417(a).
[51] Id.

PlatinumTel List of Exhibits

Exhibit A	Household Worksheet
Exhibit B	Lifeline Application Form
Exhibit C	Call Center Script
Exhibits D-1 & D-2	Marketing Material
Exhibit E	Internal System View

Exhibit A

Household Worksheet

Lifeline Household Worksheet

Care Wireless
PO Box 1109
Bridgeview, IL 60455
855-711-2222

Customer First Name:_____ Customer Last Name:_____

Customer Address:_____ City:_____ State:___ Zip:_____

Customer Email:_____ Customer Phone #:_____

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only **ONE** Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).
The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household **expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity).

Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.
Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

Section 1

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (*check no if you do not have a spouse or partner, or you live alone*)
   a. _____**YES**
   STOP HERE - If you checked **YES**, you **MAY NOT** sign up for Lifeline because someone in your household already receives Lifeline. Only **ONE** Lifeline discount is allowed per household.
   b. _____**NO**
   If you checked **NO**, please **CONTINUE** to **Section 2**

Section 2

2. Other than a spouse or partner, do **other adults** (people over the age of 18 or emancipated minors) live with you at your address?
   a. _____**YES**
   If you checked **YES**, please **CONTINUE** to **Section 3**
   b. _____**NO**
   If you checked **NO**, please **CONTINUE** to **INITIAL Section 4**

Other Adults:
- Parents
- Adult child
- Other adult relative (sibling, aunt, cousin, grandparent, etc.)
- Adult roommate

Section 3

3. Do you share living expenses (bills, food, etc.) and share income (your income, the other person's income or both incomes together) with at least one of the adults listed above in Section 2?
   a. _____**YES**
   STOP HERE - If you checked **YES**, then your address includes only **one household**. You **MAY NOT** sign up for Lifeline because someone in your household already receives Lifeline.
   b. _____**NO**
   if you checked **NO**, then your address includes **more than one household**. Please initial **Sections 4 and 5** below, and sign and date the worksheet.

Section 4

_____*I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.*

Section 5

_____*I certify that I live at an address occupied by multiple households.*

CERTIFICATION

Please sign and date this worksheet. Submit this worksheet to Care Wireless along with your Lifeline application.

Signature_____ Date_____

Submit completed form to: enroll@carewireless.com or fax to: 855-722-2022

Exhibit B

Lifeline Application Form

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.

IMPORTANT INFORMATION ABOUT THE LIFELINE PROGRAM

1. The Lifeline Program is a federal benefit
2. Lifeline Service is only available for one line per household. A household cannot receive benefits from multiple providers
3. 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 if you selected "Temporary" Address**

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

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

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

- ☐ SNAP / Food Stamps / WIC
- ☐ Medicaid
- ☐ National School Free Lunch Program
- ☐ Bureau of Indian Affairs
- ☐ Federal Public Housing Assistance / Section 8
- ☐ Supplemental Security Income / SSI
- ☐ Temporary Assistance to Needy Families / TANF
- ☐ 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 it must be signed and dated. *Incomplete forms 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.

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

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

(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 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. *Incomplete forms 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.

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 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 Unites 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, address, date of birth, last four digits of my social security number, dates of service initiation and/or termination, and qualifying basis for Lifeline service 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 lay, be fined or imprisoned not more than five years, or both.

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. *Incomplete forms 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.

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.

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

SECTION 4 – SIGNATURE REQUIRED

By signing below, I separately affirm and agree to each of the above statements:

_____ _____

Applicant Signature Date

SUBMIT APPLICATION

To submit your application with required documents, you may:

Email to: enroll@carewireless.com
Fax to: 855-722-2022
Mail to: P.O. Box 1109
Bridgeview, IL 60455

For Authorized Employee Use Only

CODS ID:_____ AGENT USER:_____ Shelter/Multi Resident Authorization Code (if applicable): _____
EID:_____ CTN: _____ ACCT ID:_____
Specify Documentation Presented by Customer and Examined by Company Representative:
_____

I certify that I reviewed the appropriate eligibility database to determine the above applicant's Lifeline eligibility status.
Should an eligibility database not be available I certify that the above applicant demonstrated their eligibility by providing their eligibility documentation and that such documentation has been reviewed for accuracy and legitimacy.

Store Rep Signature_____Date_____

Exhibit C

Enrollment Script

Care Wireless Enrollment Script:

CSR: Thank you for calling Care Wireless where we provide you with 300 free monthly minutes my name is _____ how may I assist you today?

Caller: I would like enroll in Care Wireless Lifeline service.

CSR: Wonderful, I will be able to assist you in the process. I will need to ask you some questions to get started. Is that ok?

Before you proceed, please verify customer has social security number. IF they do not, unfortunately we cannot provide lifeline service.

CSR: How did you hear about our service?

CSR: Are you 18 years old or older?

If Yes, continue

If No, explain that the service is only available to consumers who are at least 18 years old

CSR: Do you currently live in the state of Illinois?

If Yes, continue

If No, explain that Care Wireless service is currently only available in the State of Illinois

CSR: Are you or anyone in your household currently receiving lifeline benefits for wireless or home phone service? For example, from Safelink or ReachOut Wireless?

If NO, Continue

IF YES, CALLER DOES NOT QUALIFY.

FOLLOW THIS : Sir/ma'am, Lifeline service is limited to one per household. If you would like to receive Lifeline service from Care Wireless, please contact your current Lifeline provider and cancel the service. Once you cancel that service, please contact us to set up Care Wireless service.

CSR: Please understand that by law, the Lifeline program is available for only one person per household.

CSR: Are you currently participating in any government assistance programs? If so, which one?

If Yes, continue

If No, ask income question:

CSR: Is your income at or below 135% of the federal poverty line?

If **Yes**, ask follow up questions:

Follow Up 1: How many individuals are in your household?

Follow Up 2: What is the total annual income for everyone in your household?

Use the following table to determine if they are eligible based on income:

# Persons in Household	1	2	3	4	5
135% Annual Income	$15,080	$20,426	$25,772	$31,118	$36,464
Add $5,346 for each additional person in the household					

If qualified based on income inform the customer:

CSR: To qualify based on your income, you must provide copies of one or more of the following documents. If you provide documents that do not cover a full year (such as current pay stubs), you must submit 3 consecutive months of the same type of document within the previous 12 months. Are you able to provide this documentation?

If Yes, list the types of documents:

- 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

If No, applicant does not qualify.
NOTE: If applicant does not participate in qualifying government program and does not qualify based on income, please thank the customer and refer them to visit www.ptel.com if they would like to purchase new affordable wireless service.

CSR: Participating in _____ *(say the name of the qualifying program chosen by the customer)*
or if qualifying by income:
Your household income...

…may qualify you for Care Wireless Lifeline Service. If approved, Care Wireless Lifeline service will provide you with a free wireless phone with $15.00 worth of monthly airtime.

CSR: May I please have your residential address?

If the address is already in the system please inform:
"The address you have provided is already being used with Care Wireless Lifeline Program. Lifeline Service is available to only one person per household. If you feel that you are an independent, living in your own household, I am able to send you the Care Wireless Lifeline Household Worksheet"
NOTE: If the customer would like the form please fill out and submit the Google Form "Care Wireless Lifeline Household Form" Advise customer to please complete this worksheet and send it back to us within 14 days of today's date. If we do not receive a completed worksheet indicating that you do indeed qualify for our services, this application will be denied. If we receive a completed worksheet indicating that you do qualify for our services, this application will be approved.

CSR: I would also like to inform you that upon completion of this application you will be required to send in proof of your eligibility for the program you selected (or . You may mail, fax or email your proof to Care Wireless. Please be advised without this documentation you will not receive your Lifeline handset.

----------FILL OUT APPLICATION NOW----------

CSR: There are a few more questions that I will need to ask. Please respond with Yes or No to the following questions.

CSR:

1. Do you certify under penalty of perjury that the information contained within this application is true and correct and that providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in you being barred from the program?
   Customer must answer YES to continue

2. You certify that you meet the eligibility requirements of the program you selected, or have an annual household income at or below 135% of the Federal Poverty Guidelines?
   Customer must answer YES to continue

3. You will provide documentation of eligibility.
   Customer must answer YES to continue

4. You are not listed as a dependent on another person's tax return (unless you are over the age of 60)

   Customer must answer YES to continue

5. You understand that you and your household can only have one Lifeline-supported telephone service. You understand the one-per-household requirement as it has been explained to you. You understand the violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in your de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government?

   Customer must answer YES to continue

6. You attest to the best of your knowledge that you and no one in your household is receiving a Lifeline-supported service from any landline or wireless company, such as Safelink, Assurance Wireless, or Reach Out Wireless?

   Customer must answer YES to continue

7. You understand that Care Wireless Lifeline service is non-transferable. You may not transfer your service to any individual, including another eligible low-income consumer.

   Customer must answer YES to continue

8. You understand that if your service goes unused for 60 days, your service will be suspended, subject to a 30 days period during which you may use your service, or contact Care Wireless to confirm that you want to continue receiving service.

   Customer must answer YES to continue

9. You will notify Care Wireless within 30 days if you no longer qualify for Lifeline. You understand this requirement and may be subject to penalties if you fail to notify Care Wireless. Specifically, you will notify Care Wireless if:
   a. You cease to participate in the federal or state program you selected, or you annual household income exceeds 135% of the Federal Poverty Guidelines
   b. You are receiving more than one Lifeline supported service
   c. You no longer satisfy the criteria for receiving Lifeline support

   Customer must answer YES to continue

10. You will notify Care Wireless within 30 days of moving. Additionally, if your address is a temporary address, you understand that you mus verify your address with Care Wireless every 90 days. If you fail to respond to Care Wireless verification attempts within 30 days, your Care Wireless service may be terminated.

    Customer must answer YES to continue

11. You understand that you may be required to recertify your continued eligibility at any time. If you fail to do so within 30 days, it will result in termination of your Care Wireless Lifeline Service

    Customer must answer YES to continue

12. You understand and consent to the fact that your 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 you do not receive more than one Lifeline benefit

    Customer must answer YES to continue

13. You authorize Care Wireless to access any records required to verify your statements on this form and to confirm your eligibility. You give permission to the duly authorized officials administering the federal & state programs to provide to Care Wireless your participation status in the selected program/programs. You give this permission on the condition that the information in this application and any information about your participation in the selected programs provided by officials be maintained by Care Wireless as confidential account information.

    Customer must answer YES to continue

CSR: Thank you. We have now completed your Care Wireless Lifeline enrollment. You will receive your phone within 2 weeks, upon approval.

CSR: The phone will have $15.00 worth of airtime which you can use for calling or texting. The rate is $0.05 per minute and $0.02 per text message, (it would be 300 minutes OR 750 text messages). Keep in mind your account will be replenished on the first day of every month and you must keep your phone powered on for the first three days of every month for Care Wireless Systems Check (to confirm the account is in use).

CSR: Also, once you receive your phone, you must make an outbound call to fully activate your service. From that point, your phone will be active and ready for you to use and your new number can be found on the back of the phone. If at any point you need to add additional minutes, you can purchase minutes with PlatinumTel Wireless. To find a location you can visit their website, Ptel.com or our website, CareWireless.com. Please be advised that the phone comes with a small pamphlet/insert that explains when you get your airtime, how to check your balance, how much minutes cost, and other useful information. Also, the handset only comes with 30 days of warranty.

CSR: Is there anything else I may assist you with today?

If Yes, assist customer in any way possible

If No, Thank you for calling Care Wireless, where we care about keeping you connected.

Exhibits D1 & D2

Marketing Materials

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 618 BRIDGEVIEW IL
POSTAGE WILL BE PAID BY ADDRESSEE

CARE WIRELESS
PO BOX 1109
BRIDGEVIEW IL 60455-9910

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

care WIRELESS

A Lifeline Product

FREE PHONE & 300 FREE MONTHLY MINUTES

STAY CONNECTED WITH
FAMILY & FRIENDS

APPLY TODAY!

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

www.carewireless.com

NO FEES · NO CONTRACTS · NO BILLS

the
Care Wireless Lifeline Plan

→ **up to 300 talk minutes**
or
→ **up to 750 text messages**

FREE EACH MONTH

Need more than 300 minutes?

With Care Wireless you can add as much airtime as you need at the lowest pay-as-you-go rates in the U.S.

TEXT FOR ONLY	TALK FOR ONLY
2¢ per SMS	5¢ per min

Choose a plan to fit your budget!

PLAN	$10	$20	$30	$50	$100
MINUTES	up to 200	up to 400	up to 600	up to 1000	up to 2000
ACCESS DAYS	90 days	90 days	180 days	180 days	365 days

To purchase airtime, visit **www.carewireless.com** and top-up your account instantly, or to **find a location near you.**

What do you get from Care Wireless?

- A free wireless phone
- 300 free monthly minutes (or up to 750 text messages)
- Free voicemail, caller ID, call waiting
- Free access to 911 ***EVEN IF YOU ARE OUT OF AIRTIME***
- Nationwide coverage
- Free nationwide long distance

How do you qualify?

To qualify for Care Wireless Lifeline Service you must be enrolled in one of the following programs:

- ✓ SNAP / Food Stamps / WIC
- ✓ Federal Public Housing Assistance - Section 8
- ✓ Supplemental Security Income - SSI
- ✓ Medicaid
- ✓ National School Free Lunch Program
- ✓ Temporary Assistance to Needy Families - TANF
- ✓ Low Income Home Energy Assistance Program - LIHEAP
- ✓ Bureau of Indian Affairs Programs
- ✓ *or* You may qualify if your household income is **at or below 135% of the federal poverty guideline.**

Enroll Online:
www.carewireless.com

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

*Minutes do not rollover. Any unused minutes will be lost. Care Wireless will replenish your account with $15.00 of airtime within the first 3 days of each month, so please ensure your phone is turned on and fully charged.

Care Wireless is a Lifeline product, that provides customers with a free monthly airtime discount. Care Wireless provides customers with a free wireless phone. Visit www.carewireless.com for full terms and conditions.

WELCOME to CARE WIRELESS

Guide to Care Wireless Service

Thank you for choosing Care Wireless.

A Lifeline Product

Dear Care Wireless Customer,

Congratulations, you have qualified for Care Wireless Service, a government supported program that provides free minutes of airtime each month. And in the event of an emergency, 911 is always a free call.

For complete information on Care Wireless visit **www.carewireless.com**

care WIRELESS

855-711-2222

www.carewireless.com

Getting started with your Care Wireless phone

Your phone is active and ready for you to use.

Receiving your monthly minutes

Your monthly minutes are loaded onto your account automatically on the first day of every month. In order to receive your monthly minutes **you must have your phone on for the first three (3) days of every month**.

Keeping your Care Wireless service active every year

In order to keep your Care Wireless Service active, you must verify your service every year. You can do this by simply visiting carewireless.com or calling a Care Specialist at 855-711-2222.

How Care Wireless service works

Using your Care Wireless phone is simple. Every month, we will automatically credit your account with your free airtime.

If you have questions about how you can use your airtime, please visit us online at **www.carewireless.com**.

Phone warranty

Your phone comes with a 30 day warranty. If in the first 30 days your phone is not working properly, you may ship your phone back to us and we will send you a replacement. Certain restrictions apply, please contact Care Wireless for details.

Care Wireless is a service provided by PlatinumTel

Need more airtime?

To add more airtime to your phone, simply purchase PlatinumTel Wireless airtime available at over 36,000 locations in the U.S. To find a location near you visit **www.carewireless.com**.

PlatinumTel Wireless airtime is also available at all MoneyGram Agent Locations. To find a MoneyGram Agent Location, please visit **moneygram.com/platinumtel**.

You can add more airtime to your Care Wireless account by setting up your online account at **www.carewireless.com**.

How to check your balance:

There are **2 easy ways** to check your airtime balance:

1. Send a text message to **9080** with the word "**BAL**". This is a free message that will not deduct from your airtime

2. Set up and online account at **www.carewireless.com** and log in to check your minute and text usage.

How much is the airtime?

Care Wireless gives you the lowest pay-as-you-go wireless rates in the U.S. If you purchase additional minutes you will only pay **2¢ per text message** sent and received and **5¢ per voice minute**.

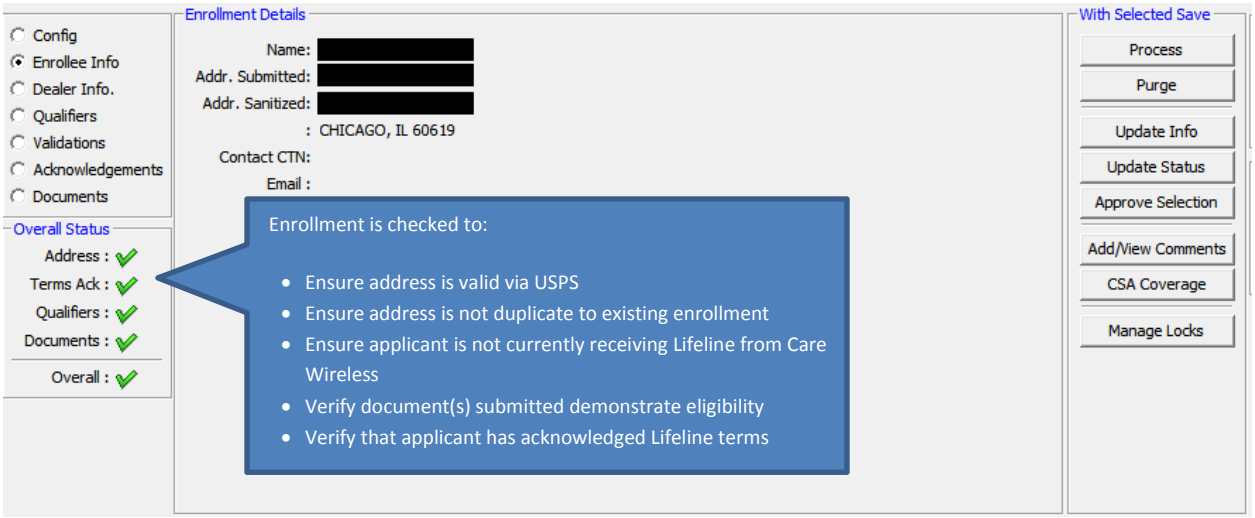
2¢ per SMS

*sent or received

5¢ per minute

Please visit us online at **www.carewireless.com** for the latest and complete terms & conditions

Exhibit E

Internal System View

Care Wireless Internal Enrollment Check