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September 20, 2012

VIA ECFS

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

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

Dear Ms. Dortch:

On Wednesday, September 19, 2012, Lance Steinhart, John Nakahata, and Kasey Chow, on behalf of EveryCall Communications, Inc. d/b/a All American Wireless ("Everycall" or the "Company"), as well as Jon Seger, CEO of the Company, spoke with Kimberly Scardino, Divya Shenoy, Alexander Minard, David Bradford, and Michelle Schaefer of the Telecommunications Access Policy Division. We discussed Everycall's Compliance Plan as revised on September 5, 2012.

Jon Seger gave an introduction and overview of the Company, including detail regarding the Company's d/b/a Local USA, d/b/a All American Home Phone, and d/b/a All American Wireless as well as current operations, and number of wireless and wireline customers in various states. Mr. Seger confirmed the Company's commitment and ongoing efforts to re-certify its active Lifeline customer base by December 31, 2012.

We discussed the Company's relationship with AT&T. We discussed requested changes to the Company's certification form, marketing materials, and website. Finally, Everycall agreed to file a second revised Compliance Plan with all suggested changes and additions.

Attached is a copy of the presentation deck that was provided at the meeting yesterday; the sample certification form and sample marketing material provided at the meeting were filed as Exhibits A and B, respectively, in the Company's compliance plan.

Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Attorney for EveryCall Communications, Inc. d/b/a
All American Wireless

Attachment
cc: Jon Seger
John Nakahata
Kimberly Scardino
Divya Shenoy
Alexander Minard
David Bradford
Michelle Schaefer

EVERYCALL COMMUNICATIONS, INC. d/b/a ALL AMERICAN WIRELESS

Federal Communications Commission

September 19, 2012

- Introduction to EveryCall Communications, Inc.
- Financial & Technical Capability
- All American Wireless' Lifeline Plans
- Marketing Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A

Agenda

- Introduction to the Company
  - EveryCall Communications, Inc. incorporated in Louisiana on November 20, 1997
  - Operates its wireless business as All American Wireless
  - Operates its wireline business as All American Home Phone and Local USA
  - Active customers – 80% Lifeline / 20% Retail
- Names and Identifiers used by the Company
  - EveryCall Communications
  - EveryCall
  - All American Wireless
  - All American Home Phone
  - Local USA

All American Wireless ›

- ETC Designations
  - Wireless: Arkansas and Louisiana
  - Wireline: Alabama, Kentucky, Louisiana, Mississippi, North Carolina, and South Carolina

- Current Operations (both Lifeline and Retail)
  - Wireless: Louisiana
  - Wireline: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, and Texas

All American Wireless ›

- In compliance with newly amended section 54.202, EveryCall certifies:
  - It will comply with the service requirements applicable to the support that it receives;
  - It has the ability to remain functional in emergency situations;
  - It will satisfy applicable consumer protection and service quality standards; and
  - It is financially and technically capable of providing the Lifeline service.

» EveryCall has the financial capability to provide the supported Lifeline service:

- 1997 – incorporated
- 2003 – provision of wireline service
- 2011 – provision of wireless service
- Currently operating in AL, FL, GA, KY, LA, MS, NC, SC, TN, and TX

Financial Capability

- EveryCall has the technical capability to provide the supported Lifeline service :
  - Key Management Experience
    - **Kyle Coats** – 27+ yrs in telecom industry
    - **John Brydels** – 24+ yrs in telecom industry
    - **Jon Seger** – 25+ yrs in telecom industry

Technical Capability

- EveryCall proposes a choice between three (3) Lifeline plans:
  - Lifeline Basic 100 Service
  - Lifeline Basic 250 Service
  - Lifeline MAX Voice & Text

- All plans include:
  - Free calls to 911 Emergency Services
  - Free calls to Customer Service
  - Free Voicemail, Caller ID, and Call Waiting
  - Free Domestic Long Distance

Lifeline Plans

Lifeline Basic 100 Service

- Lifeline Net Cost: **FREE**
- 100 Anytime Minutes (voice or text)
- 1 text = 1 minute
- No Rollover

Lifeline Basic 250 Service

- Lifeline Net Cost: **FREE**
- 250 Anytime Minutes (voice)
- No Texting
- No Rollover

Lifeline MAX Voice & Text

- Lifeline Net Cost: **$50.75**
- 6000 Anytime Minutes
- 3000 Texts
- 150 MB data
- No Rollover

Lifeline Plans

» Public Safety and 911 / E911 Access:

- EveryCall will ensure that all handsets used in connection with its Lifeline service are E911-compliant.

- EveryCall will provide its Lifeline customers with access to 911 and E911 services:
  - through its underlying carrier, Sprint, via Cintex
  - at the time of Lifeline service initiation
  - regardless of activation status and minute availability

Lifeline Plans

- All materials will comply with disclosure requirements:
  - Disclose company name under which it does business;
  - Explain in clear, easily understood language the following:
    - ✓ Only eligible consumer may enroll in the program;
    - ✓ What documentation is necessary for enrollment;
    - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
    - ✓ Lifeline is a government benefit program; and
    - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

Marketing Plan

» EveryCall intends to market its Lifeline service via:

- Current Retail Locations
- Community Events
- TV / Radio spots
- Direct mail
- Flyers / Brochures
- Internet Banners

Marketing Plan

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

Enrolling Lifeline

» End-User Education and Disclosures:

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

Enrolling Lifeline

» End User Attestations:

- See Certification Form

ALL AMERICAN WIRELESS

For Office Use Only: Customer A/C # _____ ID: _____ Verified by: _____

1-877-974-9000
www.allamericanwireless.com

Lifeline Assistance – Certification Form LA

SECTION 1 — APPLICANT *(PICTURE ID REQUIRED)*

Name: _____ (First) (Middle) (Last)

Street Address (Not a P.O. Box): _____

Apt.#: _____ City: _____ State: LA Zip Code: _____

Is this a temporary ❑ or permanent ❑ address? *(check one)*

Billing Address (If different): _____

Apt.#: _____ City: _____ State: LA Zip Code: _____

Phone # where you can be reached to discuss this application: (_____) _____ – _____

Date of Birth: _____ Social Security # (last 4 digits only) : _____

I currently receive, or a member of my household currently receives, Lifeline assistance at the current address for either a landline or wireless service. (for instance, Affordable Phone, Assurance Wireless, AT&T, Budget Mobile, Budget Phone, New Phone, Reach Out Wireless, Safelink, or any similar provider).

❑ No ❑ Yes *(you are not eligible for Lifeline assistance. Limit one per household)*

I am age 18 years or older; and, I am head of the household.

❑ Yes ❑ No *(you are not eligible for Lifeline or Link Up assistance. Recipient must be over 18 and head of the household.)*

SECTION 2 — DISCLOSURES *(CHECK ALL THAT APPLY)*

The service for which the consumer is applying is a Lifeline service:

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program;
- Only one Lifeline service is available per household;
- 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 expenses;
- A household is not permitted to receive Lifeline benefits from multiple providers;
- Violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and
- Only eligible consumers may enroll in the Lifeline program;
- Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.
- Lifeline service must be personally activated by the applicant/subscriber.
- The service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.

I AM CURRENTLY ELIGIBLE TO RECEIVE BENEFITS FROM ONE OR MORE OF THE FOLLOWING PUBLIC ASSISTANCE PROGRAM(S)(PROOF OF PARTICIPATION IN ELGIBLE PROGRAM IS REQUIRED):

❑ Food Stamps
❑ Medicaid *(not Medicare)*
❑ Supplemental Security Income (SSI)
❑ National School Lunch Program's free lunch program *(must qualify for free lunch)*
❑ Temporary Assistance for Needy Families (TANF)
❑ Federal Public Housing Assistance (Including section 8)
❑ Low Income Home Energy Assistance (LIHEAP)

OR ❑ My total household income is at or below 135% of the Federal Poverty Guidelines. *(Guidelines are on page 2 of this form.)*

How many people are in your household? _____

IF YOU QUALIFY BASED ON TOTAL HOUSEHOLD INCOME, YOU MUST PROVIDE COPIES OF ONE OR MORE OF THE DOCUMENTS LISTED BELOW:

❑ Prior year's state or Federal tax return
❑ Social Security Benefits Statements
❑ Veterans Administration Benefits Statements
❑ Retirement / Pension Benefit Statements
❑ Divorce Decree or Child Support Documents
❑ Unemployment / Workers Compensation Benefits Statements
❑ Current Income Statements from Employer or Paycheck Stubs

IF YOU PROVIDE DOCUMENTATION THAT DOES NOT COVER A FULL YEAR (SUCH AS CURRENT PAYCHECK STUBS), YOU MUST SUBMIT THREE (3) CONSECUTIVE MONTHS WORTH OF THE SAME TYPE OF DOCUMENT WITHIN THE CURRENT CALENDAR YEAR.

Customer Service 1-877-974-9000
www.allamericanwireless.com
This certificate is good for one year from date of signing. The certificate must be updated annually for continued Lifeline participation.

EveryCall Communications, Inc. dba All American Wireless. Certain restrictions apply. Phone models vary by availability. Service not available in all areas. Copyright 2013. All rights reserved.

ALL AMERICAN WIRELESS **Lifeline Assistance – Certification Form** Continued

hone company when I am no longer participating in any of

es to provide to All American Wireless my participation

ormation about my participation in the above programs
nt information.

fits at this household or residence for either wireless ser-

of 60).

, if I change my address.

_____

ent below and providing your signature.

line.

ledge, my household is not already receiving a Lifeline service.

violation of the Commission's rules and will result in my
t.

30 days if for any reason I no longer satisfy the criteria for
based criteria for receiving Lifeline support or if I am receiving
g a Lifeline benefit.

the new address. I understand that failure to provide such

my knowledge. I acknowledge that providing false or
ogram is punishable by fine or imprisonment.

alified persons may participate in the program.

, low income consumer.

eline at least annually and my failure to re-certify my continued

es any records required to verify my eligibility for Lifeline
e Lifeline program. (For prepaid customers only)

tact me by interactive voice response or other means to notify
inder. (For prepaid customers only)

his box if you live on tribal land.)

_____

EveryCall Communications, Inc., dba All American Wireless.

Enrolling Lifeline

» Annual Recertification Compliance:

- EveryCall commits to re-certify the eligibility of all Lifeline customers as of June 1, 2012 by December 31, 2012 and report the results to USAC.
- After 2012, EveryCall will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
- All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
- In addition, EveryCall will continue to follow any state-specific requirements.

Recertifying Lifeline

- EveryCall utilizes a diligent Enrollment Process
- EveryCall's business model primarily employs direct, in-store or over the phone/internet, high quality contact and customer service
- EveryCall will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- EveryCall has a 60-day non-usage policy
- Everycall emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, employee training, process documentation, non-usage/de-enrollment procedures

Preventing Waste, Fraud & Abuse

» Additional Measures to prevent waste, fraud & abuse:

- Duplicates Database
  - Pooled External Database (CGM, LLC)
  - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
  - *if EveryCall draws $5 million+ on an annual basis

Preventing Waste, Fraud & Abuse›

QUESTIONS?