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

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
	)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization	)	
	)	
CONEXIONS LLC d/b/a Conexion Wireless Compliance Plan	)	

CONEXIONS LLC D/B/A CONEXION WIRELESS' AMENDED COMPLIANCE PLAN

THOMAS BIDDIX
CONEXIONS LLC d/b/a Conexion Wireless
PO BOX 1630
MELBOURNE, FL 32902

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CONEXIONS LLC D/B/A CONEXION WIRELESS' AMENDED COMPLIANCE PLAN

I. INTRODUCTION

CONEXIONS LLC d/b/a Conexion Wireless ("Conexions" or the "Company") is a prepaid wireless telecommunications carrier seeking designation as an Eligible Telecommunications Carrier ("ETC") solely for the purpose of participating in the Lifeline program. Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission ("FCC" or "Commission") has forborne from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.[1] Conexions will avail itself of the FCC's conditional grant of forbearance and, by its attorney, hereby files its Compliance Plan outlining the measures it will take to implement the conditions of forbearance

[1] *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,* WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) *("Order"). See also Telecommunications Carriers Eligible for Universal Service Support, Federal-State Joint Board on Universal Service, Conexions Petition for Forbearance,* WC Docket 09-197, CC Docket 96-45, Order, FCC 10-178 (rel. Oct. 1, 2010)("Conexions Forbearance Order"). In accordance with the *Conexions Forbearance Order,* Conexions filed a compliance plan on October 29, 2010.

outlined in the *Order*.[2] For the Commission's convenience, this Amended Compliance Plan replaces, in its entirety, the Compliance Plan filed on October 29, 2010 and the Compliance Plan filed on May 8, 2012. Given the severe economic environment that is forcing many low-income customers to forego wireless service, Conexions respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

II. BACKGROUND

In the *Order*, the Commission granted forbearance from the "own-facilities" requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:[3]

> (1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and
>
> (2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

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[2] Although the Company qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A), the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state, particularly for purposes of state universal service funding under state program rules and requirements. The Company 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.

[3] *See Order* at ¶¶ 368, 373 and 379.

III. CONEXIONS WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER

Conexions will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.[4]

A. Access to 911 and E911 Services

In the *Order*, the Commission requires Conexions to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.[5] The Commission and consumers are hereby assured that all Conexions customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Conexions handsets even if the account associated with the handset has no minutes remaining. In fact, 911 and E911 services are available to all Conexions subscribers. Conexions uses Verizon Wireless ("Verizon") as its underlying carrier and Conexions 911 calls are routed in the same matter through Verizon networks as those of Verizon subscribers.

B. E911-Compliant Handsets

The Commission also conditioned its grant of forbearance determination on Conexions providing only E911-compliant handsets to its Lifeline customers.[6] Conexions will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing Conexions customer does not have an E911-compliant handset, the Company will replace it with a 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-

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[4] To the extent that future changes in federal regulations render the commitments herein invalid, the Company reserves the right to modify its operations in accordance with federal regulations in effect at that time.
[5] *See Order* at ¶ 373.
[6] *See id*.

compliant handset as well.

C. Consumer Eligibility and Enrollment

Conexions will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility, Conexions will rely on the state identification or database.[7] In instances where Conexions is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

1. One-Per-Household

Conexions understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as "any individual or group of individuals who are living together at the same address as one economic unit."[8] Upon receiving an application for Lifeline support, Conexions will check the National Lifeline Accountability Database ("NLAD"), once in place, to determine whether an individual at the applicant's residential address is currently receiving Lifeline-supported service. Conexions will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If Conexions determines that an individual at the applicant's address is currently receiving Lifeline-supported service, Conexions will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, Conexions will require applicants to complete and submit to the Company USAC's one-per-household

[7] *See Order* at ¶ 98.
[8] *See Order* at ¶ 74.

template.[9] Conexions will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

On its certification forms, a draft sample of which is attached,[10] Conexions will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery address), unless they only have a temporary address, and a billing address for the service, if different (which may include a P.O Box or General Delivery address).[11] Conexions will inquire on its certification forms whether or not the applicant's address is a temporary one.[12] If and when the 90-day verification rules become effective, Conexions will notify the consumer that if they have a temporary address, the Company will contact the consumer every 90 days, by phone or text, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of Conexions' attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program.[13] Also on its certification forms, Conexions will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.[14] If the subscriber has moved, Conexions will update the NLAD, once in place, with the information within 10 business days of receipt of the information.[15]

As detailed below, Conexions' certification form will clearly explain the one-per-household requirement and all consumers must certify that they receive Lifeline support for a single subscription per household.

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[9] *See Order* at ¶ 78.
[10] *See* Exhibit A. The draft form remains subject to change, but substantially reflects the content of the Company's application.
[11] *See Order* at ¶ 85.
[12] *See Order* at ¶ 89.
[13] *See id.* As of the date of filing of this Compliance Plan, this requirement has not been approved pursuant to the Paperwork Reduction Act.
[14] *See Order* at ¶ 85.
[15] *See id.*

2. Initial and Annual Certification

Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company website, which will provide information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Conexions' application form will identify that it is a "Lifeline" application. Conexions will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, that interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services.

Conexions' initial and annual certification forms will conform to the list of requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. Conexions' Lifeline certification forms, a draft sample of which is attached as Exhibit A,[16] will require each prospective subscriber to provide the following information:

> (i) The subscriber's full name;
> (ii) The subscriber's full residential address;
> (iii) Whether the subscriber's residential address is permanent or temporary;
> (iv) The subscriber's billing address, if different from the subscriber's residential address;
> (v) The subscriber's date of birth;
> (vi) The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
> (vii) If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
> (viii) If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in § 54.409, the number of individuals in his or her household.

The certification forms will also explain in clear, easily understandable language that:

> (i) Lifeline is a federal benefit;
> (ii) Lifeline service is available for only one line per household;
> (iii) 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

[16] Conexions is currently in the process of revising its Lifeline certification form and will file an amended version upon completion.

expenses;
(iv) households are not permitted to receive benefits from multiple providers;
(v) that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
(vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

Conexions will require all consumers, at sign up and annually thereafter, to certify under penalty of perjury that:

(i) The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;
(ii) The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
(iii) If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 54.400(e);
(iv) If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
(v) If the subscriber provided a temporary residential address, he or she will be required to verify his or her temporary residential address every 90 days;
(vi) The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
(vii) The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
(viii) The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
(ix) The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements. Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, that

meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.[17]

Enrollment in person. The Company anticipates that it will enroll approximately 75% of Lifeline applicants in person, via door-to-door neighborhood outreach or at Company events. For in-person outreach events, Conexions will ensure that ample employees, agents or representatives ("personnel") are available so that if a line forms, personnel are available to educate prospects in line on the Lifeline program and its requirements, including an explanation of what constitutes eligibility and what documentation is necessary for enrollment, that only one phone can be given to a qualified recipient per economic unit (and defining economic unit) regardless of the carrier providing the phone and service, and that the applicant will be certifying under penalty of perjury that all of their information is correct. All personnel will clearly communicate the one-per-household requirement (including that Lifeline service may only be received from one ETC) and the penalties that may result from providing false or fraudulent information.

When a prospective customer applies in person, personnel will assist the customer in filling out an electronic application form on a Company tablet or computer, will ask to see a government issued ID, and will validate the address via a USPS Database. The Company will check the applicant's information against its internal database to confirm that the applicant is not already receiving a Lifeline subsidy from Conexions; the Company will also query the NLAD, once it is available. If the customer indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC's one-per-household template as well. In cases where an eligibility database exists, personnel will query the database to determine eligibility. In states where eligibility databases are not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household

[17] *See Order* at ¶ 168.

income is at or below 135% of the federal poverty guidelines. All Conexions personnel responsible for reviewing customer sign-up forms will be trained in the types of acceptable documentation for each of the qualifying programs, as well as the types of acceptable proof of income (for customers qualifying based on income). Where the documentation provided by the customer covers less than a full year, Conexions will require the customer to provide three consecutive months of the same documentation. Conexions' Lifeline application contains an "Office Use Only" section, which must be completely filled out and signed by Company personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 4 digits of document ID). Eligibility documents are returned to the customer after review.

Finally, Conexions personnel will verbally review all certifications and disclosures with the applicant before they sign the application form, making sure the applicant verbally acknowledges each required certification before moving on to the next. Upon successful completion of the certification process, the customer is allowed to receive their free phone in person. In instances where eligibility databases cannot be accessed in real-time, Conexions will mail the phone to eligible customers once verification of eligibility is complete. Conexions mails the phones via First Class Mail with a tracking number. The phone is shipped pre-activated but Conexions will not seek Lifeline reimbursement for a customer until the customer actually uses the phone (see section III.D.2 below). Furthermore, Conexions is currently working on a process that will text the phone to confirm that the phone is being used by the intended recipient. Customers will be required to send a response text including information that would be available only for the qualified recipient and which is not included in the package with the phone, such as the last four digits of the intended recipient's social security number.

Enrollment by phone. The Company anticipates that it will enroll approximately 20% of Lifeline applicants via phone, whereby Company personnel are able to verbally explain the Lifeline program and its eligibility requirements, including required information and disclosures, as well as collect and input electronically the application form information and obtain the applicant's signature via IVR. Company personnel will obtain applicant's verbal confirmation of each required certification. If the applicant indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC's one-per-household template as well. If no eligibility database is available, personnel will advise the applicant that they are required to provide proof of identity verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company as well as what documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS, duplicates database, eligibility databases). If no eligibility database is available, the application will be placed in a "hold" status until the Company receives copies of the applicant's proof documentation, at which point Company personnel will review the documentation and complete the "Office Use Only" section of the application form, which must be completely filled out and signed by personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 4 digits of document ID). All Conexions personnel responsible for reviewing customer sign-up forms will be trained in the types of acceptable documentation for each of the qualifying programs, as well as the types of acceptable proof of income (for customers qualifying based on income). Where the documentation provided by the customer covers less than a full year, Conexions will require the customer to provide three consecutive months of the same documentation. Conexions will destroy

copies of proof documentation and deliver phones to eligible customers by mail. Conexions mails the phones via First Class Mail with a tracking number. The phone is shipped pre-activated but Conexions will not seek Lifeline reimbursement for a customer until the customer actually uses the phone (see section III.D.2 below). Furthermore, Conexions is currently working on a process that will text the phone to confirm that the phone is being used by the intended recipient. Customers will be required to send a response text including information that would be available only for the qualified recipient and which is not included in the package with the phone, such as the last four digits of the intended recipient's social security number.

Enrollment online. The Company anticipates that it will enroll approximately 5% of Lifeline applicants via the Internet, whereby, prospective customers will be able to fill out an application form online and sign electronically. Conexions will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.[18] If the customer indicates that their address is a multi-household residence, online interface will require the applicant to complete USAC's one-per-household template as well. If no eligibility database is available, the online interface will advise the applicant that they are required to provide proof of identity verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company as well as what documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS, duplicates database, eligibility databases). If no eligibility database is available, the application will be placed in a "hold" status until the Company receives copies of the applicant's proof documentation, at which point Company personnel will review the documentation and complete the "Office Use Only" section of the application form, which must be completely filled out and signed by personnel

[18] *See Order* at ¶ 123.

in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 4 digits of document ID). All Conexions personnel responsible for reviewing customer sign-up forms will be trained in the types of acceptable documentation for each of the qualifying programs, as well as the types of acceptable proof of income (for customers qualifying based on income). Where the documentation provided by the customer covers less than a full year, Conexions will require the customer to provide three consecutive months of the same documentation. Conexions will destroy copies of proof documentation and deliver phones to eligible customers by mail. Conexions mails the phones via First Class Mail with a tracking number. The phone is shipped pre-activated but Conexions will not seek Lifeline reimbursement for a customer until the customer actually uses the phone (see section III.D.2 below). Furthermore, Conexions is currently working on a process that will text the phone to confirm that the phone is being used by the intended recipient. Customers will be required to send a response text including information that would be available only for the qualified recipient and which is not included in the package with the phone, such as the last four digits of the intended recipient's social security number.

Conexions will determine eligibility utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a),(b)), as well as any additional state-specific criteria. Prior to enrolling a new subscriber, Conexions will check the eligibility of low-income consumers first by accessing state or federal social services electronic eligibility databases, where available.[19] If a database is used to establish eligibility, Conexions will not require documentation of the consumer's participation in a qualifying federal program; instead, Conexions or its representative will note in its records what specific data was relied upon to

[19] *See Order* at ¶ 97.

confirm the consumer's initial eligibility for Lifeline.[20] However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for Conexions to check electronic databases for eligibility, Conexions will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.[21] Conexions will require acceptable documentation both for income eligibility and for program eligibility. The Company will not retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility.[22] Conexions understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Conexions remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.[23] Conexions has an internal team dedicated to reviewing all submitted Lifeline application forms for viability; if a form is questionable in the least, Conexions will not include a subsidy request for such customer on its 497, will suffer the loss of equipment already provided, and will take necessary action regarding the responsible agent.

Conexions provides employees, agents, and representatives with training designed to give them an understanding of Lifeline program requirements and permit them to review customer documentation and determine whether it is sufficient to establish a customer's eligibility to participate in the Lifeline program under the Commission's rules. No Company employee, agent, or representative may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material. Among other things, the

[20] *See Order* at ¶ 98.
[21] *See Order* at ¶ 99.
[22] *See Order* at ¶ 101.
[23] *See Order* at ¶ 110.

Lifeline program training discusses the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training explains what sections of the form must be completed by the customer and reviews the form disclosures in detail, to facilitate the ability of employees, agents, or representatives to explain each item contained therein and answer any customer questions.

3. Annual Re-Certification

Conexions understands that it must re-certify the eligibility of its entire Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013, and the Company may elect to perform this re-certification on a rolling basis throughout the year.[24] By December 31, 2012, Conexions will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.[25] The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. Conexions will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Conexions understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.[26]

Alternatively, where a database containing consumer eligibility data is available, Conexions (or state agency or third-party, where applicable) will instead query the database by the end of 2012 and maintain a record of what specific data was used to re-certify eligibility and

[24] *See Order* at ¶ 130.
[25] *See id.*
[26] *See Order* at ¶ 132.

the date of re-certification. If a subscriber's address cannot be verified through the state data, Conexions will contact the subscriber every year during the annual certification process to obtain a valid address.[27] After 2012, Conexions will continue to annually certify the continued eligibility of its entire subscriber base, either by accessing a qualifying database, or by electing to have USAC administer the self-certification process on the Company's behalf.[28]

Conexions will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for reimbursement. As part of Conexions' submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

> (1) that the Company has procedures in place to review consumers' documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state, and
>
> (2) that the Company is in compliance with all federal Lifeline certification procedures.[29]

D. Other Reforms to Eliminate Waste, Fraud and Abuse

Conexions shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Company customers from engaging in such abuse of the program, inadvertently or intentionally.

Conexions has implemented enrollment procedures designed to prevent subsidies for

[27] *See Order* at ¶ 131.
[28] *See Order* at ¶ 133.
[29] *See Order* at ¶ 126-27.

duplicate, ineligible, or inactive subscribers. As detailed in section III.C.2, Conexions first details the one-per-household rule with the applicant and validates each applicant's identity via a government issued ID card, passport, etc during in-person enrollment. Additionally, as mentioned above, Conexions requires the applicant to provide their date of birth (DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor the Company representative can forge certification forms based on false names and addresses. Once the applicant's identity is confirmed, Conexions verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, Conexions checks any available eligibility database. If one is not available, the applicant is required to provide proof of eligibility, and Conexions records unique information (such as the last 4 digits of the document ID) identifying the documentation the customer is using to prove eligibility. This prevents ineligible applicants from receiving the subsidy.

Each applicant's address is validated for accuracy against the United States Postal Service ("USPS") database and saved in the USPS-approved format, which permits Conexions' subscriber database to more accurately prevent duplicates by avoiding variations of the same address appearing in the database. Conexions cross-references all applicants against its own database, (by name, address, date of birth, last four of the applicant's social security number, etc.) to ensure the applicant is not currently in the Company's system, and Conexions will also query the NLAD, once it is available. If conflicting information is found to be the same consumer or household, the applicant is denied Lifeline benefits. Conexions also conducts manual reviews of its subscriber lists prior to filing its FCC Form 497s to ensure that it does not claim subsidies for any duplicate subscribers.

1. National Lifeline Accountability Database

Conexions will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Conexions will provide to the NLAD subscriber name,

address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.[30] Conexions will provide the information listed above for existing subscribers within 60 days of Commission notice that the NLAD is capable of accepting subscriber information.[31]

Furthermore, on its certification form, Conexions will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name, telephone number, and address will be divulged to USAC (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.[32]

Within 30 days following Commission notice that the NLAD is capable of accepting queries, Conexions will query the NLAD to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from the Fund.[33]

2. Subscriber Usage

Conexions will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, Conexions will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.[34] Conexions will notify its subscribers at service initiation about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage

[30] *See Order* at ¶ 189.
[31] *See Order* at ¶ 190.
[32] *See Order,* Appendix C.
[33] *See Order* at ¶ 203.
[34] *See Order* at ¶ 257.

in any 60-day period of time.[35] An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.[36] Conexions will notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the procedures outlined in section E below. Conexions will continue to comply with applicable public safety, including transmitting 911 calls to the appropriate PSAP even if the Company is no longer providing Lifeline service to a consumer.[37]

3. Marketing & Outreach

Conexions will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Conexions will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:[38] (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless

[35] *See id.*
[36] *See Order* at ¶ 261.
[37] *See Order* at ¶ 262. 911 transmission will actually be performed by the Company's underlying facilities-based CMRS provider.
[38] See Exhibit B for a sample advertisement. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. *See Order* at ¶ 275.

service; and (4) Lifeline is a government benefit program. Conexions' website and printed collateral will explain the documentation necessary for enrollment, and the details of Conexions' plans. Such collateral and website information, as well as its application, will make clear that 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.[39] For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Conexions will include the URL link for its website where disclosures will be listed. Additionally, Conexions will disclose the company name under which it does business.[40]

4. Audits

The *Order* requires ETCs that draw $5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, to hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess the ETC's overall compliance with the program's requirements.[41] Conexions will comply with this requirement if and when it is approved, including applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.[42]

E. De-Enrollment

If at any time a Conexions Lifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-

[39] *See Order* at ¶ 275.
[40] *See id.*
[41] *See Order* at ¶ 291.
[42] *See Order* at ¶ 294. As of the date of filing of this Compliance Plan, the audit requirement has not been approved pursuant to the Paperwork Reduction Act.

enrollment requests. Conexions Lifeline customers simply call the Company, via 611 or the toll-free customer service number, and they can speak to a live operator to de-enroll from Conexions' Lifeline program. Conexions will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

Ineligibility. Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).[43]

If a customer does not respond to the Company's annual verification survey within 30 days, or if Conexions has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Conexions will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.[44] Similarly, Conexions will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.[45]

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,[46] Conexions will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. Conexions will de-enroll any subscriber that has not used the Company's

[43] *See Order* at ¶ 122.
[44] *See id*. In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.
[45] *See Order* at ¶ 89.
[46] *See Order* at ¶ 214-16.

Lifeline service for 60 consecutive days, as discussed in section IV.B above. Conexions will provide the subscriber 30 days' notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be initiated after 30-days of non-usage. Conexions will update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.[47]

F. Additional Rule Amendments

1. Terms and Conditions of Service

The Company's Lifeline offering is summarized in section IV.C below. Conexions' terms and conditions of service are subject to change as needed, and the most current version will be maintained at www.conexionwireless.com.

2. Reporting Requirements

Conexions will report all information required by section 54.422, including as it may heretofore be amended. This includes the names of the Company's holding company, operating companies and affiliates, and any branding ("doing-business-as company" or brand designation), and 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 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.[48]

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[47] *See Order* at ¶ 257.

[48] *See Order* at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person.

3. Reimbursement from USAC

In seeking reimbursement for Lifeline, Conexions will comply with the requirements of C.F.R § 54.407, as revised by the *Order*.[49] Conexions will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,[50] and the Company will seek reimbursement for actual lines served, not projected lines.[51]

4. Section 54.202 Certifications

Conexions certifies the following in accordance with newly amended C.F.R. § 54.202: (1) Conexions will comply with the service requirements applicable to the support that it receives; (2) Conexions is able to remain functional in emergency situations; (3) Conexions will satisfy applicable consumer protection and service quality standards.

IV. COMPANY INFORMATION

Conexions is a Tennessee limited liability company, with headquarters in Melbourne, Florida. Conexions will provide prepaid wireless telecommunications services to consumers by using the network of its underlying carrier(s), currently Verizon. Conexions obtains from Verizon, through an existing agreement with USA Cellular Networks, LLC (a Verizon wholesaler), the network infrastructure and transmission facilities to allow Conexions to operate as a Mobile Virtual Network Operator ("MVNO").

A. Names and Identifiers

The sole managing member of Conexions is Thomas E. Biddix. Conexions Acquisition Group, LLC is a holding company that directly owns 100% of Conexions. Mr. Biddix directly owns 100% of Conexions Acquisition Group, LLC, which provides no services. Conexions has no

[49] *See Order* page 221.
[50] *See Order* at ¶ 128.
[51] *See Order* at ¶ 302.

subsidiaries and operates under the d/b/a Conexion Wireless. Mr. Biddix is also owner of the following telecommunications companies: USA Cellular Networks, LLC, and Associated Telecommunications Management Services, LLC ("ATMS"), the holding company for All American Telecom, Inc.; American Dial Tone, Inc.; Bellerud Communications, LLC; BLC Management LLC; DIALTONE & MORE, INC.; LifeConnex Telecom, LLC; REN-TEL COMMUNICATIONS, INC.; SC TxLink, LLC; and Triarch Marketing, Inc. None of the ATMS companies currently provide telecommunications services.

B. Financial and Technical Capability

Conexions is financially and technically capable of providing Lifeline-supported services.[52] Conexions began providing service in 2010 and provides service to both Lifeline and non-Lifeline customers. Conexions currently provides Lifeline services in Arkansas, Maryland and West Virginia and has not been subject to enforcement action or ETC revocation proceedings in any state. Conexions does not and will not rely exclusively on USF disbursements to operate; the Company receives revenue from its non-Lifeline prepaid wireless business, as well as revenue from Lifeline subscribers purchasing services not included in the Lifeline subsidy (i.e. additional minutes). Furthermore, the senior management of Conexions has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.[53] Conexions utilizes a proprietary software platform that controls all billing, payment, and provisioning matters, which has served it well in the states in which it currently operates. Conexions will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

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[52] *See Order* at ¶ 387.
[53] See Exhibit C for key management resumes.

C. Lifeline Offering

Conexions will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, currently Verizon.[54] Conexions currently offers its Lifeline service in Arkansas, Maryland and West Virginia.[55] As summarized in Exhibit D attached hereto, the Company's Lifeline offering will provide customers with a free mobile device and the following Lifeline plan options:[56]

100 Free Minutes (Option #1). 100 free voice minutes per month at no charge. Text messaging available for the cost of one talk minute per one text message sent or received (1:1). Unused minutes rollover.

250 Free Minutes (Option #2). 250 free voice minutes per month at no charge. Text messaging available for the cost of one talk minute per one text message sent or received (1:1). No rollover.

In addition to wholly-supported voice services, the Company's Lifeline plans will include voicemail, three-way calling, call forwarding, caller ID, and call waiting at no additional charge. Customers will have the capability of purchasing additional bundles of minutes for $10, $20, or $30 (200, 450, or 1000 minutes, respectively). Additional airtime can be purchased by calling Customer Service or by contacting Customer Service via the Company's website, www.conexionwireless.com. Customers are not bound by a local calling area requirement; all Conexions plans come with domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Verizon Wireless Network. No roaming charges apply, and

[54] The Company reserves the right to alter the proposed Lifeline rate plans on a state-by-state basis, particularly as required by state public utility commissions (PUC). The Company commits to pass through the entire Lifeline subsidy amount directly to the consumer.

[55] Conexions received facilities-based ETC designation in these states prior to December 29, 2011.

[56] The Company may alter its Lifeline offering as necessary on a state-by-state basis, particularly as required by state public utility commissions.

directory assistance and international calls are blocked at no additional charge to the consumer. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Calls to Conexions Customer Service are also free, provided the subscriber dials #611 or #4669 from his or her mobile device. Conexions does not impose burdensome credit checks or long-term service contracts on its prepaid customers.

V. CONCLUSION

Conexions submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, Conexions respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may continue providing the benefits of much-needed Lifeline service to qualifying low-income consumers.

Respectfully submitted,

THOMAS BIDDIX
CONEXIONS LLC d/b/a Conexion Wireless
PO BOX 1630
MELBOURNE, FL 32902

Dated September 20, 2012

Exhibit A

Sample Lifeline Certification Form

Lifeline Order/Certification Form - Arkansas

I currently participate in or receive benefits from one of the following programs.

- ☐ Food Stamps
- ☐ Medicaid
- ☐ Supplemental Security Income
- ☐ Section 8
- ☐ Low Income Home Energy Assistance Program
- ☐ National School Lunch Program
- ☐ Temporary Assistance for Needy Families
- ☐ Federal Poverty Guidelines – 135% or below *(Check below. For each additional person add $5,346 Annual/$445 Month)*

☐ 1 person - $15,079 Annual/$1,257 Month	☐ 3 people - $25,771 Annual/$2,148 Month	☐ 5 people - $36,463 Annual/$3,039 Month	☐ 7 people - $47,155 Annual/$3,930 Month
☐ 2 people - $20,425 Annual/$1,702 Month	☐ 4 people - $32,117 Annual/$2,593 Month	☐ 6 people - $41,809 Annual/$3,484 Month	☐ 8 people - $52,501 Annual/$5,375 Month

Please verify that all enrollment sections are complete and this form has been signed and dated. ☐ Permanent Address ☐ Temporary Address

First Name | Last Name | DOB (MM/DD/YY) | Last Four of SSN

Residential Street Address

Apt or Unit | City | State | Zip

Home Phone Number | Alternate Contact Number

Email Address

Certification Signature (PLEASE READ AND SIGN BELOW)

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

____ (1) I understand that Lifeline is a federal benefit. I attest that the information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.

____ (2) I am a current recipient of the program checked above, or have an annual household income at or below 135% of the Federal Poverty Guidelines.

____ (3) I have provided documentation of eligibility. Service requests will not be processed until this form has been received and verified by the company.

____ (4) I understand that I and my household can only have one Lifeline-supported telephone service. I understand that Lifeline service is available for only one line per household. A household cannot receive benefits from multiple providers and 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. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government.

____ (5) I attest that I and no one in my household is receiving a Lifeline-supported service from any other land line or wireless company such as Safelink, Assurance, or Reachout Wireless.

____ (6) I understand my Conexion Wireless Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.

____ (7) I understand that if my service goes unused for sixty (60) days, my service will be terminated; I will be notified thirty (30) days before termination, during which period I may use the service or contact Conexion Wireless to confirm that I want to continue receiving their service.

____ (8) I will notify Conexion Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if my household:
- (1) ceases to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines.
- (2) is receiving more than one Lifeline supported service;
- (3) no longer satisfies the criteria for receiving Lifeline support.

____ (9) I will notify Conexion 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 Conexion Wireless every ninety (90) days. If I fail to respond to Conexion Wireless' address verification attempts within thirty (30) days, my Conexion Wireless Lifeline service may be terminated.

____ (10) Conexion Wireless has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my Conexion Wireless Lifeline service.

____ (11) I authorize and understand that Conexion Wireless may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program all the information related to my account including but not limited to my name, date of birth, social security, usage history, address and phone number.

____ (12) I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy.

____ (13) I understand that if USAC identifies I am receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

____ (14) I authorize Conexion Wireless to access any records to verify my statements & my eligibility for the Lifeline program.

☐ *Check here if someone else at this residence receives a Lifeline discount - If so, please fill out household worksheet*

BY SIGNING BELOW, I CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED IN THIS APPLICATION IS TRUE AND CORRECT

Signature

Date

ESN _____

MDN (phone number) _____

Documentation Used to Verify Eligibility: _____

Representative _____

Representative Signature _____

Exhibit B

Sample Advertisement

FREE CELL PHONE

Conexion WIRELESS

with MONTHLY VOICE/TEXT MINUTES & NATIONWIDE LONG DISTANCE

If You Receive Government Assistance like SSI, Food Stamps & Medicaid, You Could Qualify for Conexion Wireless' Lifeline service and receive a Free Cell Phone with Free Monthly Minutes!

NO MONTHLY BILL, CREDIT CHECK OR CONTRACT REQUIRED!

SIGN UP TODAY!

Actual model may vary.

CONEXIONWIRELESS.COM

CALL NOW **877 - 771 - RING (7464)**

This is a Lifeline-supported service. Lifeline is a government assistance program and only eligible customers may enroll in the program. Proof of participation is required, such as a copy of an issued EBT card in the applicant's name. To inquire about qualifying programs and requirements in your state, please call the number on this advertisement. This Lifeline service is limited to one per household, consisting of either a landline or wireless service, and is not transferable. Consumers who willfully make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

Exhibit C

Key Management Resumes

MANAGEMENT PROFILES

KEVIN POWERS –

Operations Manager

PROFILE OF QUALIFICATIONS

Fourteen years of increasingly responsible experience in **MVNO / Reseller Operations Management, Project Management, Marketing Management,** and **Sales Management**. Combined excellent sales, technical, analytical and operational qualifications with demonstrated achievements in key performance indicators that led to strategic goals and objectives consistently being met or exceeded. Experience includes:

- Operations Management
- Project Management
- Resource Management
- Procedure Development
- Staff Development
- Risk Management
- Major Account Sales
- Equipment Sales
- Major Account Sales Trainer
- In/Outbound Sales Trainer
- Customer Relations Manager
- Marketing Management
- Software Application Design
- Software Application Testing
- Software Integration
- IVR Call Flow Management
- System Auditing
- IT Management

PROFESSIONAL EXPERIENCE

Operation Management

Responsible for running daily operations of a pre-paid wireless carrier that caters to the credit challenged demographic.

- Expanded marketing strategies to include multiple advertising mediums and increase daily sales numbers
- Created a pick, pack and ship process for delivering handsets
- Worked with Balance Sheets, Profit and Loss Statements and Pro Forma Income Statements
- Developed business models and forecasting models
- Responsible for 300 seat call center
- Project manager for wireless software that included a Customer Relations Manager interface module and database, a carrier provisioning module, vendor API's module, Ticket Tracking module, VoIP Connectivity module, IVR module, Reporting and Audit module
- Built a reporting and auditing process for managing Key Performance Indicators

EDUCATION & TRAINING

- **Bachelor of Science in Business Administration;** Concord University, Athens,WV
- Academic concentrations in Finance and Marketing

WILLIAM MICHAEL ROBERSON –

Compliance Manager – Manages a team of 10 associates responsible for regulatory compliance as related to the Lifeline program. Tasks include developing workflows to initiate, track, receive, upload, and store required documentation to support the program. Duties include personnel management such as discipline, performance assessment, and attendance. Report directly to the Operations Manager.

Support Services Manager – Responsible for managing a team of 12 associates in the provisioning, repair, and escalated billing resolution of land-line residential phone service. Responsible for personnel management to include discipline, performance assessment, and attendance. Report directly to the Chief Operating Officer.

Application Software Specialist – Responsible for troubleshooting and maintaining the Overgroup H_2O telecommunication provisioning, billing, and order processing software system. Duties included maintaining user roles, settings, and permissions for nearly 500 users. Created and edited shared and on demand reports. Troubleshot, tested, audited, and served as point of contact for the system; determining causes and corrective action. Assisted in training and coaching of staff with system related procedures. Frequently worked directly with the CEO, call center director, and other senior management to resolve system issues and workflows.

Sales and Customer Service Team Leader – Managed and motivated a team of 16 phone agents who provided sales and customer service support for telecommunication services. Professionally handled and resolved escalated customer issues or complaints. Monitored and coached agents while acting as a technical and procedural resource. Responsible for personnel management to include discipline, performance assessment, and attendance.

LATOYA DUKES –

Customer Service Manager – Training manager and course development for over 1,300 employees for multiple campaigns: designing and writing courses, leading customer service representatives and teams of trainers, strategically directing company initiatives. A proven record of accomplishment of exceptional improvements in learning processes, productivity, and customer satisfaction while reducing costs, lowering turnover, and maintaining a positive work environment. Expertise includes Exceptional Communication, Organization and Leadership Skills, Design/delivery of Training, Performance Consulting, Adult Learning Principles, Strategic Thinker and Decision Maker, Process & Leadership Course Training, Coaching and Development of Professional Customer Service Representatives. Proficient in handling computer software and applications including Microsoft Office and groupware (i.e. Oracle and PowerPoint).

RESUME

THOMAS E. BIDDIX

CEO/Chairman of the Board
Strategix Capital Group, LLC
100 N. Harbor City Blvd
Melbourne, FL 32935

PHONE (321) 298-1599 cell
FAX (321) 281-3944

ACCOMPLISHMENTS:

- Has a long and dynamic career as an Entrepreneur. Began career in the telecommunications industry in the early 1990's as a cellular reseller. Developed new and innovative ways to bring telecommunications services to the credit challenged whom the major tier one providers typically underserve. Recognized the opportunity to provide cellular service to many customers who did not have a sufficient credit score and were typically denied service. Developed one of the first prepaid cell phone technologies where we created a chip that when inserted into a cell phone, allowed the minutes to be metered. Credit challenged customers would pre-purchase a block of minutes, eliminating the required security deposits and credit risk. Truly a revolutionary concept in the early 1990's.

- Capitalizing on the opportunities created with the sweeping changes contained in the 1996 Telecommunications Act, in the late 1990's, formed Pre-Paid Solutions, Inc. and further developed and improved new generations of technologies to serve the credit challenged in the telecommunications industry. Pre-Paid Solutions, Inc. grew, through sales and mergers into a large international company by raising angel capital and venture capital. Eventually took this company public through Pre-Cell Solutions, Inc., onto the OTCBB stock exchange. Sold the company. Proudly, 100,000 customers are still using an evolved version of this technology today.

- After the sale of company, in the early 2000's, my creative and inventive nature led to the co-invention and patent of an apparatus for cleaning medical transport boards. Thus, began my foray into the emergency medical supply ("EMS") industry. Expanded into other parts of the EMS industry and continued entrepreneurship with the launch of the Unifold product line, which is still being utilized today in disaster relief response.

- The credit challenged also have difficulty getting basic home phone service, including 911 emergency services – a situation that was exasperated as the U.S. economy

faltered. I applied the vast experience and knowledge that I gained in the prepaid cellular industry and created similar systems to bring those same advantages and efficiencies to the prepaid home phone market, utilizing government programs that subsidize these consumers.

ORGINIZATIONS/AWARDS

- Angel sponsor for the backpack program with Brevard Schools Foundation
- Top 3 Finalist for "Children's Hero of the Year" Award presented by Eckerd Youth Alternatives
- Sponsor of Florida Institute of Technology Founder's Football Club
- Board of Director, Florida Institute of Technology Entrepreneurs Board of Business
- Director, Space Coast Economic Development board
- Board of Trustees, Brevard Community College
- Board of Directors, KLD Youth Foundation
- Recognized by a broad Varity of charities for extensive philanthropic work

Other Past Community Involvement:

- President of Future Business Leasers of America
- President of The Diversified Work Program

Exhibit D

Proposed Lifeline Rate Plans

Offer Includes:
FREE Phone
FREE Minutes
FREE Access to Voicemail, Caller ID, Call Waiting, 3-Way Calling, & Call Forwarding
FREE Domestic Long Distance
FREE Calls to 911 Emergency Services
FREE Customer Care Calls via #611, #4669
Text Messaging billed at one voice minute per text (1:1)

Option 1 - 100 Voice Minutes/Month
Unused Minutes Roll Over

Option 2 - 250 Voice Minutes/Month
Unused Minutes Do Not Roll Over

Additional Minute Options:

$10 for 200 Minutes
$20 for 450 Minutes
$30 for 1000 minutes