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VIA ECFS

December 7, 2012

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

Re: WC Dockets 09-197 and 11-42
Fourth Amended Compliance Plan of True Wireless, LLC

Dear Secretary Dortch:

Pursuant to the Commission's *Lifeline Reform Order*,[1] please find attached the Fourth Amended Compliance Plan of True Wireless, LLC ("True Wireless").

In addition to some minor revisions, the plan provides updated details regarding True Wireless' increased use of third-party retail stores to market its services, which will replace all live events and door-to-door sales in Oklahoma.

True Wireless respectfully requests expedited approval of its compliance plan. Please contact me if you have any questions regarding this filing.

Respectfully submitted,

Danielle Frappier

[1] *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012); *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).

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

In the Matter of	
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
True Wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only	

FOURTH AMENDED COMPLIANCE PLAN OF TRUE WIRELESS, LLC

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December 7, 2012

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SUMMARY

True Wireless, LLC ("True Wireless") hereby seeks to avail itself of the Commission's grant of forbearance from the "own facilities" requirement by submission of this Fourth Amended Compliance Plan. True Wireless fully complies with all conditions of the recently-amended Lifeline rules and all pertinent conditions in the *Lifeline Reform Order*.

True Wireless is technically and financially qualified to provide Lifeline service. True Wireless launched operations as an ETC in 2010 and now provides Lifeline services in five states. True Wireless is successfully providing Lifeline-supported services and has a steadily increasing subscriber base. True Wireless is financially stable and is fully capable of honoring its service obligations.

True Wireless complies with the requirements pertaining to consumer qualifications for Lifeline set forth in new 47 C.F.R. § 54.409 and any state-specific requirements. More specifically, unless otherwise required under applicable state law, True Wireless requires all subscribers to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines; or (2) the household's participation in one of the federal assistance programs listed in the Commission's rules. True Wireless confirms that neither the subscriber nor anyone else in the subscriber's household is subscribed to a Lifeline service. This Fourth Amended Compliance Plan describes the procedures by which True Wireless: (1) analyzes the eligibility of applicants to obtain Lifeline service; (2) obtains proof of eligibility from applicants; (3) certifies the eligibility of applicants; (4) collects the necessary information from applicants; (5) requires applicants to certify as to their eligibility to receive Lifeline benefits; and (6) annually re-certifies all Lifeline subscribers. True Wireless has included as an exhibit its Lifeline application forms for its wireless Lifeline services.

True Wireless' practices comply with the 911/E911 access conditions set forth in the *Lifeline Reform Order*. Specifically, True Wireless provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated – regardless of activation status and availability of minutes – and provides its Lifeline subscribers with E911-compliant handsets. True Wireless' practices provide access to 911/E911 services to the extent these services have been deployed by its underlying carrier. True Wireless commits to continue these practices going forward.

True Wireless 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. True Wireless has attached a representative sample of its marketing materials incorporating these disclosures.

True Wireless shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, True Wireless has implemented procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual. These measures include practices intended to: (1) prevent duplicates within True Wireless' subscriber base; (2) avoid reimbursement for any subscriber until the subscriber activates service; (3) ceasing reimbursement for subscribers who fail to use the service for a 60-day period; and (4) ensuring that True Wireless provides only one Lifeline service per household.

As detailed below, True Wireless' practices and procedures comply with the Commission's applicable Lifeline regulations and orders, and True Wireless commits to continuing these practices going forward. Accordingly, True Wireless respectfully requests expeditious approval of this Third Amended Compliance Plan as well as its pending petitions for ETC designation.

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

In the Matter of	
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
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FOURTH AMENDED COMPLIANCE PLAN OF TRUE WIRELESS, LLC

True Wireless, LLC ("True Wireless") through its undersigned counsel, hereby seeks to avail itself of the Federal Communications Commission's ("Commission") grant of forbearance from the "own facilities" requirement set forth in 47 U.S.C. § 214(e)(1)(A) by submission of this Compliance Plan.[1] True Wireless' Compliance Plan is filed in accordance with the procedures established in the *Lifeline Reform Order*[2] and clarified the *Public Notice* issued by the Wireline Competition Bureau on February 29, 2012.[3]

True Wireless respectfully requests expeditious approval of its Compliance Plan and its Petition for designation as an eligible telecommunications carrier ("ETC") in states that have

[1] Although True Wireless does own some of its own facilities, including a switch that routes operator service and directory assistance calls, in light of recent rule changes by the Commission, True Wireless seeks forbearance from the "own facilities" requirement referenced above.
[2] *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (FCC rel. Feb. 6, 2012) ("*Lifeline Reform Order*").
[3] *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*").

declined jurisdiction over wireless carriers[4] so that the Company may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC, and so that it may provide service to additional eligible low-income consumers in the various states for which it has pending ETC petitions.

As set forth below, True Wireless fully complies with all conditions set forth in the Commission's recently amended Lifeline rules and with all pertinent conditions set forth in the *Lifeline Reform Order*. This Compliance Plan describes the measures True Wireless has implemented in order to achieve full compliance with the Commission's Lifeline rules and policies. For the convenience of the Commission, this Compliance Plan follows the format established by the Wireline Competition Bureau in the *Public Notice*.

I. INFORMATION ABOUT TRUE WIRELESS AND THE LIFELINE PLANS IT OFFERS

A. Company Information

True Wireless, LLC ("True Wireless") is a Texas limited liability company, with headquarters in Bartlett, Tennessee. True Wireless' 100%, direct parent is True Wireless Acquisition Group, LLC, which is, in turn, 100% directly owned by Kevin Brian Cox, who more commonly goes by the name of Brian Cox. True Wireless Acquisition Group, LLC provides no services and serves only as a holding company. True Wireless has no subsidiaries and operates under the name "True Wireless."[5] True Wireless has no affiliates that participate in the Lifeline or any other federal universal service program. Mr. Cox owns a non-controlling interest in 321

[4] *True Wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, Petition, WC Docket No. 09-197 (filed Dec. 22, 2011, and amendments filed on Mar. 29, May 25, and Oct. 17, 2012).

[5] True Wireless has registered the following additional d/b/a names in Texas: "Government Wireless Benefits," "Total Communication Services" and "USA Government Phones." It has not yet used these names to markets its services (other than utilizing the URL www.usagovphone.com, which simply redirects users to True Wireless' online form), but may do so in the near future.

Communications, Inc., a CLEC and interexchange services provider. Mr. Cox also owns a majority interest in Prepaidworx, LLC, which is not a telecommunications carrier but which facilitates consumer payments for prepaid services (including True Wireless' service) on-site at third-party retailers through its physical payment terminals and web-based application. Finally, Mr. Cox owns 100% of Contigo Wireless LLC, which intends to offer international-only calling cards but has not yet begun to provide service.[6]

B. True Wireless' Financial and Technical Capabilities to Provide Lifeline Service

True Wireless has been providing service since mid-2010 and focuses on providing service to low-income consumers. To date, the company has been designated as an ETC in five states: Arkansas, Maryland, Oklahoma, Rhode Island and Texas. True Wireless also has ETC petitions pending with regulatory commissions in sixteen states,[7] and an ETC petition pending with the Commission for ten states.[8] True Wireless does not seek, and will not accept, High Cost support in any of those states, or in the states in which it currently provides service.

True Wireless is successfully providing Lifeline supported services in the various states where it has received ETC designation and has a steadily increasing customer base. True

[6] Other entities that qualify as affiliates of True Wireless due to common ownership interests are: Remax on Track, LLC (real estate), Ox-Kan Arms, LLC (firearm sales), Market Maker, LLC (athletic training facility), Car Haul USA, LLC (wholesale vehicle transport), Creditcardworx, LLC (not yet operational), KLLC, LLC (real estate), Benefits Management, LLC (debt reduction), KCS Performance, LLC (vehicle maintenance and customization), Cardawg, LLC (real estate), EWP, LLC (real estate); EWP Communication, LLC (consulting services), Southeast Equity Alliance, LLC (real estate), Dealer Select LLC (used car sales); blowsafe.com LLC (breathalyzer accuracy agent); Wirelesspins.com LLC (not yet operational, consumer payments for prepaid wireless services); Cox Asset Management, LLC (estate planning) and GSD Asset Management LLC (real estate). None of these entities are telecommunications carriers.

[7] Those states include Georgia, Idaho, Indiana, Kansas, Louisiana, Maine, Michigan, Missouri, North Dakota, South Dakota, Utah, Vermont, Washington, West Virginia, Wisconsin and Wyoming. True Wireless has withdrawn (without prejudice) its petitions in Kentucky and New Jersey. Its petition in Mississippi has been retired without prejudice. Those states have indicated a preference for ETCs to refile their petitions subsequent to Commission approval of their compliance plans.

[8] The states included in True Wireless' petition and subsequent amendments filed with this Commission are: Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia.

Wireless owns and operates its own switching facilities through which operator services and directory assistance calls are routed, back-office and operations support systems ("OSS") that are ideally suited to serve lower revenue subscribers. True Wireless has invested millions of dollars to evaluate, design, develop and integrate these systems, and has a management team with significant experience in the telecommunications industry. Resumes of the top two members of this team are attached hereto as **Exhibit 1**.

True Wireless is financially stable and fully capable of honoring its service obligations to customers as well as federal and state regulatory obligations. Although True Wireless derives the majority of its revenue from the sale of prepaid wireless services, True Wireless does not rely exclusively on USF disbursements to operate. For example, True Wireless derives additional revenue from the sale of wireless services with respect to certain of its wireless plans that are not fully covered by the Lifeline subsidy, the sale of wireless services to non-Lifeline customers, the sale of replenishment airtime minutes, and the sale of optional service packages (*e.g.*, Internet/text services).

Finally, True Wireless has not been subject to any enforcement action or ETC revocation proceeding in any state.

C. Geographic Area of True Wireless' Service Offerings

True Wireless first began providing prepaid wireless ETC service in 2010 and the company now provides this service in the following states: Arkansas, Maryland, Oklahoma, Rhode Island and Texas. The company is poised to rapidly expand its operations once its pending ETC applications are approved by the Commission and various state regulatory commissions.

D. True Wireless' Lifeline Service Plans

In **Arkansas, Maryland, Rhode Island and Texas**, True Wireless is currently offering the following prepaid wireless service plan under the Lifeline program: 90 minutes of nationwide calling for a monthly charge of $9.25 for non-Lifeline subscribers, and no monthly charge for Lifeline subscribers after application of the standard $9.25 discount. Text messages are valued at one talk minute per message sent and/or received. True Wireless is in the process of updating its offerings in these states to include a 250 minute plan that will be the same in all respects to the 90 minute plan with the only difference being that the 250 minute plan will not include texting.[9] The service in these states includes a 911-compliant handset and the following at no additional charge: voicemail, call waiting, caller ID, balance inquiries and calls to emergency 911 services. Unused minutes do not carry over to the following month. Subscribers may purchase additional blocks of minutes in 30, 100, 250 or 400 minute increments for $5, $10, $20 and $30 respectively. Subscribers who use the service outside of True Wireless' service area incur a roaming charge of $0.59 per minute.[10] The rate for directory assistance calls is $2 per request. True Wireless blocks international calls for its Lifeline subscribers at no additional charge.

In **Oklahoma**, True Wireless offers two plans for Lifeline customers in its service territory, which is almost entirely Tribal in nature. The first plan includes an unlimited number

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[9] True Wireless will offer the 90 minute (with text) plan and the 250 minute (no text) plan in all future states in which it receives designation, including the ten states subject to its application pending before the Commission, and is currently updating its pending applications.

[10] Roaming charges are very rarely incurred by True Wireless' Lifeline subscribers because it is True Wireless' policy to prevent or reduce to a minimum the number of instances where its subscribers are provided service through roaming arrangements. Specifically, True Wireless has two underlying carriers to choose from and puts its subscribers on the network that is better suited to avoid roaming charges to the extent possible. Because True Wireless' services are prepaid, customers do not incur out-of-pocket costs in the rare instances where roaming charges would apply. Instead, True Wireless deducts roaming minutes at a higher rate than non-roaming minutes, generally on a twelve to one ratio.

of minutes for a monthly fee of $6.75 after application of the standard $34.25 Tribal Lifeline discount. The second plan includes 1,000 minutes per month and a monthly fee of $1.00 after application of the standard $34.25 discount. All other terms and conditions are identical to those of the 90-minute plan described above.

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

The *Public Notice* requires carriers to include certifications required under recently amended 47 C.F.R. § 54.202. True Wireless hereby certifies that it complies with the service requirements applicable to the support it receives, and will continue to do so.[11] Specifically, True Wireless' 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 (as described above in Section I(D)); (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 True Wireless' service area has implemented 911/E911 systems (as described below in Section III); and (iv) toll limitation for qualifying low-income consumers.[12]

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[11] 47 C.F.R. § 54.202(a)(1).

[12] Toll limitation means both toll blocking and toll control, or, if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control. True Wireless commits to meeting this requirement by offering service on a prepaid, or pay-as-you-go, basis. 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." *In Re 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). Moreover, True Wireless' calling plans do not distinguish between local or toll services, and offer nationwide calling. True Wireless will provide this toll control to qualifying low income consumers at no additional charge.

II. TRUE WIRELESS COMPLIES WITH NEW COMMISSION RULES RELATING TO DETERMINATIONS OF SUBSCRIBER ELIGIBILITY FOR LIFELINE SERVICES

True Wireless complies with the requirements pertaining to Lifeline consumer qualification set forth in new section 54.409 of the Commission's rules.[13] True Wireless also complies with all additional state requirements in those states in which it has been designated an ETC, and will comply with all requirements in states where it is designated an ETC in the future. More specifically, True Wireless requires all subscribers to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new 47 C.F.R. § 54.409(a)(2) or 47 C.F.R. § 54.409(a)(3). True Wireless also confirms that the subscriber is not already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service.[14]

True Wireless has used several forms of marketing for its Lifeline supported services, which include direct mail, Internet advertising, television and radio advertisements, and door-to-door and live events conducted by third party marketing firms, and is now focusing its efforts on live events (except in Oklahoma) and third-party owned retail stores, which makes it easier for prospective subscribers to provide proof of eligibility. These marketing channels are intended to induce potential subscribers to contact True Wireless either in person (at retail locations, door-to-door and at live events), over the Internet or by telephone. Although the logistics of the enrollment process varies somewhat for each marketing channel as is further described below, in all cases, Lifeline applicants are thoroughly screened to ensure that they are qualified before a handset is delivered. True Wireless' call center is monitored by a compliance department. That

[13] 47 C.F.R. § 54.509.
[14] 47 C.F.R. § 54.409(c).

compliance department is monitored by employees at its headquarters. These employees monitor calls on a daily basis to ensure the proper supervision of and compliance by the customer service representatives ("CSRs") with applicable rules and the company's compliance policies. True Wireless utilizes information gathered during this process to continually train its CSRs and call center compliance managers.

Moreover, all third party marketing firms (and all these firms' employees or agents) are contractually obligated to follow all applicable rules and True Wireless' compliance policies, which are embodied in the text of the firms' contracts with True Wireless. Each individual (employee or agent) engaged in selling the services must sign an "Lifeline addendum," which is an addendum to the marketing firm's master service agreement with True Wireless. This Lifeline addendum spells out the Lifeline rules and policies that must be complied with and the consequences for failure to do so. These firms enter orders directly into True Wireless' customer management system, which rejects any order for an address outside of True Wireless' authorized service area. True Wireless is finalizing its contracts with its marketing firms so that it will have exclusive arrangements such that it will only employ one marketing firm per state, which allows for greater control over its marketing channels. In order to incentivize compliance, True Wireless includes in its contracts with these firms that no commission is paid on any sale that fails to be fully compliant with all Lifeline rules. The marketing firm is also responsible for reimbursing True Wireless for any handset distributed for any non-compliant sale.

Finally, in July 2012, True Wireless began beta testing a program of soliciting customers in third-party owned retail stores. True Wireless is now finalizing arrangements with retail stores in Oklahoma, which it intends to replace its use of live events and door-to-door sales agents in Oklahoma. It also plans to expand the use of these retail locations in other states.

These retail stores will also be subject to the same compliance safeguards as the third party marketing firms, including the safeguards of True Wireless' customer management system, and financial and contractual incentives to fully comply with all Lifeline rules.

A. True Wireless' Procedures to Determine Consumer Eligibility for the Lifeline Program

If True Wireless cannot determine an applicant's eligibility for Lifeline by accessing income or program eligibility databases, True Wireless personnel (employees, third party customer service representatives, third party marketing firms at live events, or retail store representatives) review documents to establish eligibility in accordance with the criteria set forth in 47 C.F.R. § 54.409. All True Wireless personnel who interact with existing Lifeline customers or Lifeline applicants are fully trained to understand the Commission's revised Lifeline eligibility rules and True Wireless' practices and policies designed to implement these new rules.

True Wireless follows the Commission's requirements pertaining to acceptable documentation to establish eligibility based either on income level or participation in a qualified government assistance program, unless otherwise established by a state Lifeline administrator or other state agency. Specifically, acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program ("SNAP") electronic benefit transfer card or Medicaid participation card (or copy thereof); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.[15] Acceptable documentation of income eligibility includes: (1)

[15] *Lifeline Reform Order* at ¶ 101.

the prior year's state, federal, or Tribal tax return; (2) current income statement from an employer or paycheck stub; (3) a Social Security statement of benefits; (4) a Veterans Administration statement of benefits; (5) a retirement/pension statement of benefits; (6) an Unemployment/Workers' Compensation statement of benefit; (7) federal or Tribal notice letter of participation in General Assistance; or (8) a divorce decree, child support award, or other official document containing income information. If the prospective subscriber presents True Wireless with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.[16] True Wireless personnel examine and record the type of documentation presented by each prospective Lifeline subscriber, but do not retain copies of these documents.[17] If an applicant is unable to provide documentary proof of eligibility based on either household income level or current participation in a qualified program, True Wireless denies that application.

B. True Wireless' Procedures for Subscriber Certifications

In the *Lifeline Reform Order*, the Commission established a path for a transition to a national database that will be used to confirm the initial and continued eligibility of a Lifeline customer.[18] True Wireless will utilize that database when it becomes operational. Until that time, however, True Wireless will continue to use relevant state databases where available, and otherwise adheres to the following procedures for enrolling prospective customers into the Lifeline program.

True Wireless has implemented certification procedures that enable prospective customers to demonstrate their eligibility by contacting True Wireless either in person or by

[16] 47 C.F.R. § 54.410(b)(1)(i)(B).
[17] 47 C.F.R. § 54.410(b)(1)(ii) - (iii); 47 C.F.R. § 54.410(c)(1)(ii)-(iii).
[18] *See Lifeline Reform Order* at ¶ 403.

telephone, facsimile or over the Internet. Except in states in which applicants are enrolled through a designated state agency, True Wireless has direct contact with all prospective customers applying for Lifeline service, either in person through its employees or third party marketing firms at live events, representatives at third party retail locations, or by telephone, facsimile or over the Internet. At live events and the retail locations, True Wireless representatives examine the qualifying documentation in person or, if the applicant does not have the documentation at the time, direct the applicant to supply the documentation via fax or electronic delivery. Prospective customers who do not complete True Wireless' Lifeline Application in person must return the signed document and eligibility documentation to True Wireless by mail, facsimile, electronic mail or other electronic transmission. True Wireless accepts electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006 and any applicable state laws, and is submitting as **Exhibit 2** a script for oral certifications in which it has drafted consumer-friendly language that captures all information required by the Commission's new certification requirements.[19]

Every prospective subscriber in a non-database state is required to complete True Wireless' "Lifeline Application."[20] True Wireless' Lifeline Applications for the states in which it currently operates is attached hereto at **Exhibit 3**. These Lifeline Applications conform to the requirements of the *Lifeline Reform Order*, 47 C.F.R. § 54.410(d) and 47 C.F.R. § 54.405.

True Wireless collects the following information from prospective subscriber in its Lifeline Application forms: (1) the subscriber's full name; (2) the subscriber's full residential

[19] *See Lifeline Reform Order* at ¶ 168; 47 C.F.R. § 54.419.

[20] In Texas, True Wireless now obtains the Lifeline certification form directly from the consumer, but utilizes the state database to confirm eligibility, per the revised procedures required by the Public Utility Commission of Texas.

address (P.O. Boxes are not permitted); (3) whether the residential address is permanent or temporary; (4) the subscriber's billing address, if different; (5) the subscriber's date of birth; (6) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number[21]); (7) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (8) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.[22] Finally, any prospective subscriber who resides at an address occupied by multiple households must certify as such on True Wireless' Lifeline Application and must complete a separate Lifeline Household Worksheet.[23]

In accordance with 47 C.F.R. § 54.410(d), in its Lifeline Applications, True Wireless requires all Lifeline applicants to certify, under penalty of perjury, that: (1) the subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the subscriber will notify True Wireless within 30 days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant 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; (3) if the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal

[21] True Wireless only includes language regarding a Tribal identification number on forms used in states with Tribal areas. *See* Oklahoma and Rhode Island forms in Exhibit 3. Currently, True Wireless only serves Tribal communities in Oklahoma and Rhode Island.
[22] 47 C.F.R. § 54.410(d)(2).
[23] *See Lifeline Reform Order* at ¶ 79.

lands, that he or she lives on Tribal lands;[24] (4) if the subscriber moves to a new address, that he or she will provide that new address to True Wireless within 30 days; (5) if the subscriber provided a temporary residential address to True Wireless, the subscriber will verify his or her temporary residential address every 90 days upon the final effective date of this rule; (6) the subscriber's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the subscriber's household is not already receiving a Lifeline service; (7) the information contained in the subscriber's application/certification form is true and correct to the best of the subscriber's knowledge; (8) the subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; (9) the subscriber acknowledges that he or she may be required to re-certify his or her continued eligibility for Lifeline at any time, and that his or her failure to re-certify as to continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits; and (10) that True Wireless is authorized to (i) access any records required to verify the subscriber's statements on the form and to confirm eligibility under the Lifeline program and (ii) release any records required for the administration of the Lifeline program (*e.g.*, name, telephone number and address), including to USAC, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program.[25]

In accordance with 47 C.F.R. § 54.410(d)(1), True Wireless' Lifeline Application forms disclose the following information: (1) 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; (2) only one Lifeline service is available per household; (3) a household is

[24] Because True Wireless' designated service areas only include Tribal areas in Oklahoma and Rhode Island, True Wireless' Lifeline Applications for those states include this certification. *See* Oklahoma and Rhode Island forms in Exhibit 3.

[25] *See* Exhibit 3.

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; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.[26]

Finally, in accordance with 47 C.F.R. § 54.405(c), True Wireless' Lifeline Application indicates, using easily understood language, (1) that True Wireless' low income targeted service is a Lifeline service; (2) that Lifeline is a government assistance program; (3) that the service is non-transferrable; (4) that only eligible consumers may enroll in the program; and (5) that the program is limited to one discount per household.[27]

C. True Wireless' Procedures for Annual Verification of Lifeline Customers

In accordance with the requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410(f), True Wireless will annually re-certify all of its Lifeline subscribers by either (1) querying the appropriate eligibility or income databases, confirming that the subscriber continues to meet the program- or income-based eligibility requirements for Lifeline and documenting the results of that review, or (2) obtaining a signed certification from the subscriber that meets the certification requirements set forth in 47 C.F.R. § 54.410(d).

For 2012, True Wireless is in the process of re-certifying the eligibility of its Lifeline subscriber base as of June 1, 2012 on a rolling basis, to be completed by the end of 2012, and report the results to USAC by January 31, 2012.[28] True Wireless is notifying its subscribers in writing that a failure to respond to the recertification request will result in de-enrollment in the

[26] *Id.*
[27] *Id.*
[28] *Lifeline Reform Order* at ¶ 130.

Lifeline program.[29] True Wireless de-enrolls subscribers who do not respond to the annual verification or fail to provide proof of continued eligibility in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(4).

True Wireless permits subscribers to re-certify their eligibility for Lifeline benefits through the following ways: an online form on its website (www.gotruewireless.com); an oral re-certification by calling True Wireless' call center (which are recorded); or a paper form that can be scanned and e-mailed, faxed or handed to a third party marketing firm and forwarded to True Wireless.

III. TRUE WIRELESS' COMPLIANCE WITH THE FORBEARANCE CONDITIONS RELATING TO PUBLIC SAFETY AND 911/E911 ACCESS

True Wireless' existing practices comply with the 911/E911 access conditions set forth in paragraph 373 of the *Lifeline Reform Order*. Specifically, True Wireless currently: (1) provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated, regardless of activation status and availability of minutes, and (2) provides its Lifeline subscribers with E911-compliant handsets and replaces, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services. True Wireless' existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying wireless carrier. True Wireless commits to continue these practices going forward.

IV. TRUE WIRELESS' COMPLIANCE WITH THE COMMISSION'S MARKETING AND DISCLOSURE REQUIREMENTS FOR PARTICIPATION IN THE LIFELINE PROGRAM

True Wireless has incorporated into its marketing materials[30] for its Lifeline services, in clear, easily understood language: (1) that the service is supported by Lifeline, a government

[29] *Id.* at ¶ 142.

program; (2) that only eligible consumers may enroll in the program; (3) that documentation is necessary for enrollment; and (4) that the benefit is limited to one per household and is non-transferrable.[31] True Wireless also discloses its name on all marketing materials.[32] A sample advertisement incorporating this language is attached hereto at **Exhibit 4**.

V. TRUE WIRELESS' PROCEDURES AND EFFORTS TO PREVENT WASTE, FRAUD AND ABUSE IN CONNECTION WITH LIFELINE FUNDS

True Wireless shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, True Wireless has implemented a variety of measures and procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual.

Prevention of Duplicates within True Wireless' Subscriber Base. At the time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the United States Postal Service ("USPS") database and saved in the USPS-approved format, which permits True Wireless' subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. At live events and retail locations, True Wireless' representatives can access the True Wireless database in order to perform these functions remotely. Once the address is validated for accuracy and format, it is checked against addresses for all True Wireless addresses. If an existing True Wireless subscriber is receiving service at the same address, True Wireless' system will not permit any order for Lifeline service to proceed. True Wireless also conducts additional checks to ensure that the same subscriber is not receiving more than one service by checking its

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[30] "Marketing materials" includes, but is 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 Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).
[31] *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).
[32] *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(d).

database for the same subscriber name, date of birth and the last four digits of the person's social security number. Moreover, all orders for Lifeline service are subjected to a secondary USPS accuracy and format check the following day. Any corrections needed as a result of the secondary check, such as correcting address format, are promptly entered into True Wireless' system. True Wireless also conducts real-time scans of its database to flag any duplicate addresses, dates of birth, etc. in addition to conducting manual reviews of its subscriber lists prior to filing its FCC Form 497s in order to ensure that it does not claim subsidies for any duplicate addresses.

Service Activation. True Wireless does not and will not seek reimbursement for Lifeline service for any subscriber until the subscriber uses the service to either activate the service or to complete an outgoing call.[33] Depending on the underlying wireless carrier utilized, True Wireless' subscribers activate their service in one of two ways. If the subscriber's service is provisioned on the network of one underlying carrier, the subscriber may activate the service by making an outbound call. If the subscriber's service is provisioned on the other underlying carrier's network, that subscriber's service may be activated by confirming through an IVR process that he or she wishes to activate the account by entering a number on the key pad. These subscribers are automatically routed to the IVR upon attempting to make a first outbound call. The method utilized is dictated by the particular underlying network to be utilized in the relevant geographic area. In addition, in Texas, the application is not processed until the applicant's name and address are confirmed as being eligible by the state Lifeline database, which is managed by Solix. Only after a Texas applicant's eligibility is confirmed by Solix is the handset

[33] 47 C.F.R. § 54.407(c). True Wireless' Oklahoma subscribers make a monthly out-of-pocket payment for their service, and therefore, the service activation and usage requirements of 47 C.F.R. § 54.407(c) do not apply to True Wireless' Oklahoma operations. Nevertheless, True Wireless' internal policy is to impose the same activation business rules to its Oklahoma subscribers.

provided or shipped out. Thereafter, the Texas subscriber is subject to the same outbound call/IVR process described above.

Non-Usage Policy. Long before the release of the *Lifeline Reform Order*, True Wireless voluntarily adopted a policy whereby a subscriber who has not used his or her handset within 60 days is de-enrolled from the Lifeline program (after a 30-day notice period). Upon de-enrollment, True Wireless ceases seeking Lifeline reimbursements for that subscriber. True Wireless' non-usage policy ensures that only subscribers who actually utilize their wireless service continue to receive Lifeline-subsidized service, and that True Wireless only receives Lifeline support for those subscribers who remain enrolled in the program. True Wireless has continued this practice in strict conformance with the requirements of 47 C.F.R. § 54.407(c) and 54.405(e)(3).[34]

Specifically, after 60 days of non-use,[35] True Wireless provides notice to the subscriber that failure to use the Lifeline service or provide other confirmation to True Wireless that the subscriber wishes to retain their Lifeline service within 30 days from the date of the de-enrollment notice will result in de-enrollment from the Lifeline program.[36] True Wireless does not request further Lifeline reimbursement for any de-enrolled customer and True Wireless will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[37]

One Per Household Rule. True Wireless has implemented policies and practices in accordance with the Commission's rules and the *Lifeline Reform Order* to ensure that it provides

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[34] *See supra*, footnote 34.

[35] Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from True Wireless to add to the subscriber's plan; (3) answering an incoming call from a party other than True Wireless; or (4) responding to a direct contact from True Wireless confirming that the subscriber wants to continue receiving the service. 47 C.F.R. § 54.407(c)(2).

[36] 47 C.F.R. § 54.405(e)(3).

[37] *Id*.

only one Lifeline service per household. As described above, True Wireless has already implemented procedures to ensure that True Wireless itself only provides one Lifeline service per household. When the National Lifeline Accountability Database becomes available, True Wireless will fully comply with the requirements of 47 C.F.R. § 54.404 and will utilize the database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service. Finally, if True Wireless has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, for example, due to a violation of the one-per-household rule, True Wireless initiates its termination process in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(1).

De-Enrollment and Disconnection. True Wireless' subscribers may easily de-enroll from the Lifeline program or disconnect their service altogether. There is a link on the home page of True Wireless' website (www.gotruewireless.com) for de-enrollments and disconnections. This link permits subscribers to de-enroll from Lifeline and either subscribe to a non-Lifeline service or cancel their service altogether. Subscribers may also de-enroll or disconnect their service by calling True Wireless' customer service call center.

VI. CONCLUSION

True Wireless submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*, the *Public Notice* and the Commission's rules pertaining to Lifeline. Accordingly, True Wireless respectfully requests expeditious approval of its pending ETC Petition and this Compliance Plan so that True Wireless may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been

designated an ETC and may provide service to additional eligible low income consumers in the various states for which it has pending ETC petitions.

Respectfully submitted,

Danielle Frappier
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Counsel to True Wireless, LLC

December 7, 2012

Exhibit 1
Resumes of Key Personnel

Exhibit 1
Resumes of Brian Cox and Danny Michael

Brian Cox – Owner and CEO

Brian Cox is the owner and CEO of True Wireless, where he is responsible for the company's strategic planning and overall operations. Mr. Cox has owned True Wireless since January 2011 and has overseen the company's success and the expansion of its operating service area and subscriber base. Mr. Cox is a successful entrepreneur with over ten years' experience in the telecommunications industry, including a particular emphasis on serving low income consumers as a competitive service provider. Presently, Mr. Cox owns an interest in 321 Communications, Inc., a CLEC and interexchange services provider, and a majority interest in Prepaidworx, LLC, which facilitates consumer payments for prepaid services at retail establishments through payment terminals. Finally, Mr. Cox owns a number of successful, non-telecommunications related businesses.

Mr. Cox's experience in the telecommunications industry dates to 2002, when he began supervising the installation of inside wiring. He then directed the company's expansion as a provider of resold wireline and wireless telecommunications services to commercial accounts. For instance, Mr. Cox's company resold the wireline services of XO Communications and the wireless services of Sprint/Nextel Corp. Several years later, Mr. Cox founded a CLEC that focused on providing competitive telecommunications services to residential subscribers. That company eventually focused on serving low-income consumers, and Mr. Cox gained critical first-hand experience delivering telecommunications to this underserved group of consumers. Mr. Cox sold that company in 2009 and now devotes his time to overseeing the operations and expansion of True Wireless.

Danny Michael – Vice President

Danny Michael is True Wireless' Vice President, where his primary responsibility is oversight of the day-to-day operations of the company. Mr. Michael has been with True Wireless since January 2011 and has been an integral part of the company's growth and success since that time. In particular, Mr. Michael oversees True Wireless' business systems and its relationships with third-party marketing firms.

Mr. Michael has ten years' experience in the telecommunications industry, with experience in both wireline and wireless services. Mr. Michael began his career in the telecommunications industry in the sale of wireless services at Sprint/Nextel and later transitioned to sales and account management for enterprise customers (business-grade Internet access services and complex telephone systems). Mr. Michael's experience also includes providing competitive telecommunications services to residential subscribers, including low-income consumers.

Exhibit 2
Script for Oral Certifications

Verbal Certification Script for True Wireless Call Center

1. Good afternoon Mr./Mrs. Let me confirm your information, and we will be done here and able to mail your phone out.

2. Would you kindly state your first and last name for our records?

3. Is the following information correct?
    a. Your [permanent—state if applicable] physical address is _____.
        i. [If address temporary, note in file]
        ii. [If multiple "households" at same physical address MUST complete "Lifeline Household Worksheet."
            1. Household = any individual or group of individuals who are living together at the same address as one economic unit.
            2. Economic unit = all adult individuals contributing to and/or sharing in the income and expenses of a household.
    b. The last four digits of your social security number are ____.
    c. Your date of birth is _____.

    d. IF PROGRAM-BASED
        i. The government assistance you are on is _____.
    e. IF INCOME BASED
        i. The number of persons in your household is ___ and your [annual or monthly—state one] income is $_____.

4. Very Good. Now if you will confirm you qualify for Lifeline by answering yes or no to each of these statements under penalty of perjury:
    a. IF TRIBAL: You certify that you live on Tribal land. **[yes or no]**
    b. You are aware that Lifeline is a federal government assistance program, that you may not transfer your service to anyone, and only one Lifeline discount per household is allowed. If you currently receive Lifeline from another phone company, you will notify them that you are no longer qualify for their Lifeline service. **[yes or no]**
    c. You are qualified to receive Lifeline and will notify True Wireless within 30 days if you no longer receive _____ government assistance or someone else in your household receives Lifeline. **[yes or no]**
    d. You understand that if you move, you will need to provide us with your new address within 30 days. I understand that if I fail to do this I may be subject to penalties. **[yes or no]**
    e. True Wireless will contact you once per year to verify that you remain eligible, and you understand that if you do not respond or are no longer eligible, you will lose your Lifeline benefits. **[yes or no]**

f. You authorize True Wireless to verify your eligibility with, and release your personal information (such as name, qualifying program, income level) to entities and databases that manage the Lifeline program, including the Universal Service Administrative Company. **[yes or no]**

g. You understand that providing false information to receive Lifeline benefits can result in fines, imprisonment or denial of benefits, and certify that all the information you have provided is true and correct to the best of your knowledge. **[yes or no]**

[The applicant MUST say "yes" to EACH of the questions or the application MUST be denied.]

5. Mr./Mrs. ____Thank you and your order is now complete. Thank you for calling True Wireless and have a great day!

Exhibit 3
Lifeline Certification Forms

☐ 90 mins. FREE (funded by Lifeline)

Arkansas Lifeline Application Form

TRUE™ WIRELESS LLC

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security Number

Residential Address (No P.O Boxes for res. Address) | Apt: | City | State | Zip Code

This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

Multiple households sharing an address: ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

Lifeline Application

I certify that I participate in one of the following programs (check one):
You must provide documentation demonstrating your current participation in the program checked below.

- ☐ Federal Public Housing Assistance (Section 8)
- ☐ Supplemental Nutrition Assistance Program
- ☐ Medicaid
- ☐ Supplemental Security Income
- ☐ Temporary Assistance to Needy Families
- ☐ Low-Income Home Energy Assistance Program
- ☐ National School Lunch Program's free lunch program

If you wish to qualify based on income, a different form is required.

Certification Under Penalty of Perjury

I certify under **penalty of perjury** that (check or initial):

___ I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

___ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

___ I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.

___ I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.

___ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

___ I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.

___ I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.

___ If I move to a new address, I will provide the new address to True Wireless within 30 days.

___ If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.

___ I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.

___ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature | **Date**

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010

Customer Service: 877-412-1919 **Fax: 1-855-254-4611** **www.gotruewireless.com**

TRUE WIRELESS LLC

☐ 90 mins. FREE (funded by Lifeline)

Arkansas Lifeline Application Form

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security Number

Residential Address | Apt: | City | State | Zip Code

(No P.O Boxes for res. Address) This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

Multiple households sharing an address: ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:

- Last year's federal or state tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workers' Compensation statement of benefit
- Federal notice letter of participation in General Assistance
- Divorce decree, child support award or other official document containing income information

Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months

Check or complete	Persons in Household	Annual Income	Monthly Income
	1	$15,079	$1,257
	2	$20,425	$1,702
	3	$25,771	$2,148
	4	$31,117	$2,593
	5	$36,463	$3,039
	6	$41,809	$3,484
	7	$47,155	$3,930
	8	$52,501	$5,375
___ # in Household	For each add'l person, add:	$5,346	$445

Certification Under Penalty of Perjury

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___ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

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___ I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.

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___ If I move to a new address, I will provide the new address to True Wireless within 30 days.

___ If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.

___ I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.

___ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature **Date**

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010
Customer Service: 877-412-1919 **Fax: 1-855-254-4611** www.gotruewireless.com

☐ 90 mins. FREE (funded by Lifeline)

Maryland Lifeline Application Form

TRUE™ WIRELESS LLC

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security Number

Residential Address (No P.O Boxes for res. Address) | Apt: | City | State | Zip Code

This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

Multiple households sharing an address: ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

Lifeline Application

I certify that I participate in one of the following programs (check one):
You must provide documentation demonstrating your current participation in the program checked below.

- ☐ Federal Public Housing Assistance (Section 8)
- ☐ Supplemental Nutrition Assistance Program
- ☐ Medicaid
- ☐ Low-Income Home Energy Assistance Program
- ☐ Supplemental Security Income
- ☐ Temporary Assistance to Needy Families
- ☐ Medical Assistance (MA) Temporary
- ☐ Cash Assistance (TCA)
- ☐ Public Assistance to Adults
- ☐ Temporary Disability Assistance Program (TDAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Maryland Energy Assistance Program (MEAP)
- ☐ Electric Universal Service Program (EUSP)

Certification Under Penalty of Perjury

I certify under **penalty of perjury** that (check or initial):

___ I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

___ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

___ I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.

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___ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

___ I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.

___ I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.

___ If I move to a new address, I will provide the new address to True Wireless within 30 days.

___ If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.

___ I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.

___ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature | **Date**

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010

Customer Service: 877-412-1919 **Fax: 1-855-254-4611** **www.gotruewireless.com**

TRUE™ WIRELESS LLC

☐ 90 mins. FREE (funded by Lifeline)

Maryland Lifeline Application Form

Customer Account Number

Todays Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security Number

Residential Address | Apt: | City | State | Zip Code

(No P.O Boxes for res. Address) This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

Multiple households sharing an address: ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

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- Last year's federal or state tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workers' Compensation statement of benefit
- Federal notice letter of participation in General Assistance
- Divorce decree, child support award or other official document containing income information

Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months

Check or complete	Persons in Household	Annual Income	Monthly Income
	1	$15,079	$1,257
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	4	$31,117	$2,593
	5	$36,463	$3,039
	6	$41,809	$3,484
	7	$47,155	$3,930
	8	$52,501	$5,375
____# in Household	For each add'l person, add:	$5,346	$445

Certification Under Penalty of Perjury

I certify under **penalty of perjury** that (check or initial):

___ I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

___ I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

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___ I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature | Date

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010

Customer Service: 877-412-1919 **Fax: 1-855-254-4611** www.gotruewireless.com

TRUE WIRELESS LLC

☐ 1000 mins. $1.00 (includes $34.25 in Lifeline Funding)

☐ Unlimited mins. $6.75 (includes $34.25 in Lifeline Funding)

Oklahoma Lifeline Application Form

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security # or Tribal ID

Residential Address | Apt: | City | State | Zip Code

(No P.O Boxes for res. Address) This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

I certify I live on Tribal land: ☐ Yes ☐ No

Multiple households sharing an address: ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

Lifeline Application

I certify that I participate in one of the following programs (check one):
You must provide documentation demonstrating your current participation in the program checked below.

- ☐ Federal Public Housing Assistance (Section 8)
- ☐ Supplemental Nutrition Assistance Program
- ☐ Medicaid
- ☐ Low-Income Home Energy Assistance Program
- ☐ Food Distribution Program on Indian Reservations
- ☐ Supplemental Security Income
- ☐ Temporary Assistance to Needy Families
- ☐ Head Start (only those households meeting its income qualifying standard)
- ☐ Oklahoma Sales Tax Relief
- ☐ Bureau of Indian Affairs general assistance
- ☐ Vocational Rehabilitation (including hearing impaired)
- ☐ National School Lunch Program's free lunch program
- ☐ Tribally administered Temporary Assistance to Needy Families

Certification Under Penalty of Perjury

I certify under **penalty of perjury** that (check or initial):

____I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de- enrollment or being barred from the program.

____I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)

____I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.

____I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.

____I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

____I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.

____I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.

____If I move to a new address, I will provide the new address to True Wireless within 30 days.

____If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de- enrolled from the Lifeline program.

____I authorize True Wireless to retain a copy of my identification document, and access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.

____I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature **Date**

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010
Customer Service: 877-412-1919 **Fax: 1-855-254-4611** www.gotruewireless.com

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Billing Address (if different) | Apt: | City | State | Zip Code

I certify I live on Tribal land: ☐ Yes ☐ No

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Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:

- Last year's federal or state tax return
- Current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A retirement/pension statement of benefits
- An Unemployment/Workers' Compensation statement of benefit
- Federal notice letter of participation in General Assistance
- Divorce decree, child support award or other official document containing income information

Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months

Check or complete	Persons in Household	Annual Income	Monthly Income
	1	$15,079	$1,257
	2	$20,425	$1,702
	3	$25,771	$2,148
	4	$31,117	$2,593
	5	$36,463	$3,039
	6	$41,809	$3,484
	7	$47,155	$3,930
	8	$52,501	$5,375
____# in Household	For each add'l person, add:	$5,346	$445

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☐ 90 mins. FREE (funded by Lifeline)

Rhode Island Lifeline Application Form

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security # or Tribal ID

Residential Address | Apt: | City | State | Zip Code

(No P.O Boxes for res. Address) This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

I certify I live on Tribal land: ☐ Yes ☐ No

Multiple households sharing an address: ☐ I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.

Lifeline Application

I certify that I participate in one of the following programs (check one):
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- ☐ Supplemental Nutrition Assistance Program
- ☐ Medicaid
- ☐ Low-Income Home Energy Assistance Program
- ☐ Food Distribution Program on Indian Reservations
- ☐ Supplemental Security Income
- ☐ Temporary Assistance to Needy Families Program
- ☐ Family Independence Program
- ☐ General Public Assistance
- ☐ Head Start (only those households meeting its income qualifying standard)
- ☐ National School Lunch Program's free lunch program
- ☐ Rhode Island Medical Assistance Program
- ☐ Rhode Island Pharmaceutical Assistance to the Elderly
- ☐ Bureau of Indian Affairs General Assistance
- ☐ Tribally administered Temporary Assistance for Needy Families

If you wish to qualify based on income, a different form is required.

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Customer Account Number

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Birth Date | Contact Phone Number | Last 4 digits of Social Security # or Tribal ID

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☐ 90 Min. FREE (funded by Lifeline)

Texas Lifeline Application Form

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security # or Tribal ID

Residential Address | Apt: | City | State | Zip Code

(No P.O Boxes for res. Address) This is my (check one): ☐ Permanent Address ☐ Temporary Address

Billing Address (if different) | Apt: | City | State | Zip Code

I certify I live on Tribal land: ☐ Yes ☐ No

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Lifeline Application

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You must provide documentation demonstrating your current participation in the program checked below.

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- ☐ Supplemental Nutrition Assistance Program
- ☐ Medicaid
- ☐ Supplemental Security Income
- ☐ Temporary Assistance to Needy Families
- ☐ Low income Housing Assistance Program
- ☐ CHIP
- ☐ National School Lunch Program's free lunch program

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☐ 90 Min. FREE (Funded by Lifeline)

Texas Lifeline Application Form

Customer Account Number

Today's Date:

Fill Out Your Information

Last Name | First Name | Middle Initial

Birth Date | Contact Phone Number | Last 4 digits of Social Security # or Tribal ID

Residential Address | Apt: | City | State | Zip Code

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I certify I live on Tribal land: ☐ Yes ☐ No

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Lifeline Application

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- Divorce decree, child support award or other official document containing income information

Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months

Check or complete	Persons in Household	Annual Income	Monthly Income
	1	$16,755	$1,397
	2	$22,695	$1,892
	3	$28,635	$2,387
	4	$34,575	$2,882
	5	$40,515	$3,377
	6	$46,455	$3,872
	7	$52,395	$4,367
	8	$58,335	$4,862
____# in Household	For each add'l person, add:	$5,730	$477

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Exhibit 4
Sample Marketing

90 FREE Monthly Minutes

FREE Great Phone

ENROLL TODAY!

www.gotruewireless.com

TRUE WIRELESS

Free 90 Monthly Minutes

Free Enrollment
No Contract
No Deposit
No Credit Check

www.gotruewireless.com

TRUE™ WIRELESS

This offering is a Lifeline-supported service. Lifeline is a government assistance program and only eligble consumers may enroll in the program. EBT card or government documentation that clearly shows proof of participation in EBT (food stamps) is required. Please call for other qualifying programs in your state and requirements. Lifeline is limited to one benefit per household, consisting of either wireline or wireless service, and is not transferable.