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December 17, 2012

VIA ECFS

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

Re: Meggatel Corporation Revised Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On October 12, 2012, Meggatel Corporation ("Meggatel") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.[1]

Meggatel has revised its Compliance Plan to: (1) describe its company mission, relationships with Tribal organizations and unique approach to customer service (pp. 2-3); (2) identify the underlying providers associated with each of Meggatel's intermediate service providers (p. 4); (3) describe Meggatel's proprietary Tribal land residence verification mapping database (p. 6); (4) further explain its intended enrollment methods and processes in Section I.B.; (5) confirm that only Meggatel employees will enroll Lifeline applicants (p. 7); (6) describe Meggatel's proposed outreach to customers regarding continuing eligibility for Lifeline service (p.15); (7) clarify Meggatel's proposed service activation processes in Section I.E.; (8) describe the locations where Meggatel will offer non-Lifeline services in Section II.; and (9) provide further details regarding the launch of Meggatel's non-Lifeline retail services and confirm that

[1] *See 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 (Feb. 6, 2012).

Meggatel will follow the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service in Section III.

Meggatel hereby re-submits its complete Compliance Plan with the above revisions. Meggatel reiterates its request for expeditious approval of its Compliance Plan.

This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,

John J. Heitmann
Joshua T. Guyan

Counsel to Meggatel Corporation

cc: Kim Scardino
Divya Shenoy
Michele Schaefer
David Bradford

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Meggatel Corporation	

MEGGATEL CORPORATION COMPLIANCE PLAN

Meggatel Corporation ("Meggatel"),[1] through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.[2]

Meggatel commends the Commission's commitment to a nationwide communication system that promotes the safety and welfare of all Americans, including Lifeline customers. Meggatel will comply with 911 requirements as described below and it is submitting this

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[1] Meggatel Corporation hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: "Mega-Mobile" (affiliate).

[2] *See 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 (Feb. 6, 2012) ("*Lifeline Reform Order*"). The Company herein submits the information required by the Compliance Plan Public Notice. *See Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier ("ETC") in the Lifeline program.[3]

Meggatel will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission's Lifeline rules and policies more generally.[4] This Compliance Plan describes the specific measures that Meggatel intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that Meggatel will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures Meggatel will follow in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Meggatel will offer Lifeline services, the geographic areas in which it will offer services, and a detailed description of Meggatel Lifeline service plan offerings.

Meggatel is committed to providing quality prepaid wireless services to value-conscious customers with a particular focus on serving Tribal lands. Meggatel has forged relationships

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[3] *See Lifeline Reform Order*, ¶ 368. Although Meggatel Corporation qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, Meggatel Corporation reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Meggatel Corporation 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, including in any state where the public utilities commission determines that Meggatel Corporation provides service using its own facilities for purposes of a state universal service program.

[4] In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. *See* Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. *See* Public Notice, DA 12-828.

with churches and Tribal organizations to positively impact communities located on Tribal lands, which includes bringing low cost communications services to those areas, as well as reinvestment in the community. Meggatel has committed to reinvest some of its profits from non-Lifeline and Lifeline prepaid wireless services back into the Tribal communities that it serves by building food banks, job and digital literacy training centers and public use improvements such as daycare facilities, as well as investing in local businesses such as tourism.

Further, Meggatel will enroll and provide ongoing customer service to its Lifeline customers through local Meggatel employees that typically will also be members of the tribes in their coverage area. All such employees will be trained at a central facility on Tribal lands in Oklahoma, but they will serve a limited number of customers in their local area so that they can provide hands-on customer service. Calls to customer service can be routed directly to the local customer service employee in real-time.

ACCESS TO 911 AND E911 SERVICES[5]

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon Meggatel (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) 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.[6] Meggatel will comply with these conditions on the first day that it begins providing service.

Meggatel will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and customers are hereby assured that

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5 *See* Compliance Plan Public Notice at 3.

6 *See Lifeline Reform Order*, ¶ 373.

all Meggatel 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 Meggatel handsets, even if the account associated with the handset has no minutes remaining.

Meggatel is a Texas based ("MVNO"). Meggatel will use available providers such as AT&T, Verizon Wireless, Sprint and T-Mobile as its underlying wireless network providers/carriers through Liberty Wireless (Sprint and T-Mobile) and Reunion Wireless Services, LLC (Verizon Wireless and Sprint).[7] AT&T, Verizon Wireless, Sprint or T-Mobile will route 911 calls from Meggatel customers in the same manner as 911 calls from their own retail customers. To the extent that these underlying wireless network providers/carriers are certified in a given PSAP territory, this 911 capability will operate the same for Meggatel. Meggatel will also enable 911 emergency calling services for all activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, Meggatel will transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Meggatel will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. All of Meggatel phones will be E911-capable handsets. Meggatel will use phones from suppliers such as Liberty Wireless and Reunion Wireless Services, LLC that have been through a stringent certification process to ensure that the handset models used meet all 911 and E911 requirements. As a result, any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

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[7] Meggatel currently plans to use Liberty Wireless and Reunion Wireless Services, LLC, but may use other intermediary providers.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE[8]

A. Policy

Meggatel will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where Meggatel is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% (except where state jurisdiction requires otherwise) 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 sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, Meggatel will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination[9]

Meggatel will enroll its Lifeline customer's in-person, at events, at brick and mortar stores, via the Internet, direct mail, paper application[10] and/or by phone. Meggatel's electronic enrollment process will use laptops, tablets and/or other forms of electronic media to complete enrollment in real-time. Meggatel will be using Veri-Fly Data Corporation's enrollment

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8 *See* Compliance Plan Public Notice at 3.

8 *See* Veri-Fly's CompleteID™ Lifeline Enrollment Platform, included as Exhibit A.

9 *See* Model Application/Certification Form, included as Exhibit B. *See* Compliance Plan Public Notice at 3.

processing and database search engine services along with the CGM, LLC enrollment application. The electronic order process will provide Meggatel the opportunity to perform several database checks in real-time during the enrollment process as discussed below. Meggatel employees must log in to the software so that the customer enrollment is automatically tagged to a particular employee. Meggatel employees must sign his or her agreement not to take part in any fraud with respect to Lifeline enrollment.

The employee then advances through the electronic windows with the prospective customer to provide disclosures, collect information and elicit certifications as detailed below, which must be read and checked by the applicant. The customer signs the electronic/paper application and the information collected is sent through multiple database checks, including an address verification, a geographic footprint match to the ETC's authorization to provide Lifeline service in the area, an internal duplicate check and a state database eligibility check (if available) and identity verification check. Applicants that certify that they are residents of Tribal lands must provide a valid address and Meggatel will confirm that the address is located on federally recognized Tribal lands by checking the address in a proprietary mapping database that Meggatel has created. In addition, Meggatel will check each applicant against a pooled duplicate database established by Veri-Fly Data Corporation's multi database search engine along with CGM, LLC.

The electronic enrollment process includes the ability to scan customers' government-issued identification, proof of residence (if necessary because the address cannot be verified) and proof of eligibility. As discussed further below, the proof will only be retained for a short period of time for verification and then deleted. All transfers of information and scans collected electronically are transmitted in encrypted form. When the checks described herein are

completed in real-time, approved customers are enrolled and receive a handset to be activated as discussed below.

For any customers that Meggatel enrolls over the phone and online, customers will be required to submit copies of their government-issued identification and proof of eligibility to Meggatel by regular mail, fax or electronic mail (scanned version). Meggatel will use kiosks located in bodegas and convenience stores to provide information about Meggatel's Lifeline services and take customer information, however, customers will not be enrolled in Lifeline service at the kiosks. Customers will be contacted by a customer service representative for enrollment and then shipped a phone to activate service.

As discussed in further detail in Section I paragraph F below ("Additional Measures to Prevent Fraud, Waste and Abuse"), all Meggatel employees that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. All Meggatel employees, regardless of where they will work, will undergo a mandatory training session at a central Oklahoma facility where they are given training materials to review and understand. Meggatel does not plan to use agents to enroll Lifeline customers; rather, Meggatel's Lifeline enrollments will be conducted by trained Meggatel employees that are not compensated on a commission basis. Employees will be paid the same regardless of how many Lifeline enrollments they conduct in a particular day, week or month.

If Meggatel cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, a Meggatel employee will review

documentation establishing eligibility pursuant to the Lifeline rules.[11] All employees who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These employees will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Meggatel employees will be trained on acceptable documentation required to establish income-based or program-based eligibility.[12] 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 customer's Supplemental Nutrition Assistance Program (SNAP); electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the customer's participation in a qualifying state, federal or Tribal program.[13]

Acceptable documentation of income or program eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce

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[11] *See Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

[12] *See Lifeline Reform Order*, ¶ 101. *See also* USAC Guidance available at http://www.usac.org/li/telecom-carriers/step06/default.aspx.

[13] *Id*. and section 54.410(c)(1)(i)(B).

decree, child support award, or other official document containing income information for at least three consecutive months' time.[14]

Meggatel employees will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income or program based criteria by checking the appropriate box on the application form.[15] In addition, Meggatel employees will fill in at least one of the following three, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. Meggatel will not retain a copy of this documentation, except where state rules require such retention.[16] For customers enrolled via the Internet, KIOSK (customer must scan their documentation demonstrating eligibility into the kiosk), Toll-Free Facsimile, USPS Mail, or Voice/IVR, the customer will be required to fax, transmit by web cam, scan or e-mail proof of eligibility documentation to Meggatel. Proof will be reviewed by Meggatel personnel only prior to service activation and then deleted. Where Meggatel personnel conclude that proffered documentation is insufficient to establish such eligibility, Meggatel will deny the associated application and inform the applicant of the reason for such rejection. In the event that Meggatel personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at Meggatel's corporate headquarters in Southlake, Texas for resolution.[17]

De-Enrollment for Ineligibility. If Meggatel has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, Meggatel will notify the subscriber

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[14] *See Lifeline Reform Order*, ¶101; section 54.410(b)(1)(i)(B).

[15] *See Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

[16] *See Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

[17] *See id*.

of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.[18] A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a completed and signed certification form. If a customer contacts Meggatel and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, Meggatel will de-enroll the customer within five business days. Customers can make this request by calling Meggatel's customer service number (855-488-1936) and will not be required to submit any documents.

C. Subscriber Certifications for Enrollment

Meggatel will implement certification policies and procedures that enable customers to demonstrate their eligibility for Lifeline assistance to Meggatel employees as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.[19] Meggatel shares the Commission's concern about fraud, waste and abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent Meggatel's customers and employees from engaging in such fraud, waste and abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.[20] Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.[21]

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18 *See Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

19 *See Lifeline Reform Order*, ¶ 61; section 54.410(a).

19 *See* Model Application/Certification Form, included as Exhibit B. *See* Compliance Plan Public Notice at 3.

20 *See* Income Eligibility Worksheet, included as Exhibit C.

Applicants that do not complete the form in person will be required to submit a completed and signed application/certification to Meggatel by mail, facsimile, electronic mail or other electronic transmission, inclusive of the required proof of eligibility. Any evidentiary documentation submitted with the application/certification is used strictly to verify a customer's eligibility to participate in the Lifeline program. Upon approval of the customer's application/certification, such proof of eligibility is either returned to the customer or destroyed, and is not retained by Meggatel, as previously stated in section I paragraph B above ("Eligibility Determination"). In addition to acknowledgment by the applicant that the information provided is true and accurate, Meggatel employees will verbally explain the "one-per-household requirement" certification to customers when they are enrolling in person or over the phone.[22]

Disclosures. Meggatel application/certification forms will include the following disclosures: (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 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 applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.[23]

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21 *See Lifeline Reform Order*, ¶ 123.

22 *See id*. ¶ 121; section 54.410(d)(1).

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.[24]

In addition, Meggatel will notify the applicant that the Lifeline service must be personally activated by the applicant/subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.[25]

Information Collection. Meggatel will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient);[26] (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.[27]

Applicant Certification. Consistent with new rule section 54.410(d)(3), Meggatel will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or

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24 *See* section 54.405(c).

24 *See Lifeline Reform Order*, ¶ 257.

25 *See id.*, ¶ 87.

26 *See* section 54.410(d)(2).

interactive voice response recording,[28] the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify Meggatel 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 applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, that he or she lives on Tribal lands; (4) if the applicant moves to a new address, that he or she will provide that new address to Meggatel within 30 days; (5) if the applicant provided a temporary residential address to Meggatel, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's application/certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Meggatel to access any records required to verify the applicant's statements on the application/certification form and to confirm

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[27] *See Lifeline Reform Order*, ¶¶ 168-169; section 54.419.

the applicant's eligibility for the Lifeline credit. The applicant must also authorize Meggatel to release any records required for the administration of the Lifeline credit program, including to USAC to be used in a Lifeline program database. [29]

D. Annual Verification Procedures

Meggatel will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.[30] Meggatel will notify each participating Lifeline customer annually that he or she must confirm his or her continued eligibility in accordance with the applicable requirements. Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline service and if the subscriber fails to respond, he or she will be de-enrolled from the program.[31]

Verification De-Enrollment. Meggatel will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.[32] Meggatel will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, Meggatel will send a separate written notice explaining that failure to respond within 30

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28 *See* Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. *See id.*

29 *See Lifeline Reform Order*, ¶ 120.

30 *See id.*, ¶ 145.

31 *See id.*, ¶ 142; section 54.405(e)(4).

days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, Meggatel will de-enroll the subscriber within five business days.

In addition to the annual verification procedures outlined above, Meggatel will regularly check in with its Lifeline customers to confirm that they remain eligible for a Lifeline discount. Meggatel will do this for two reasons. First, Meggatel wants its Lifeline customers to become accustomed to regularly re-confirming their eligibility for Lifeline discounts, which will aid the Company in its annual verification efforts. Second, it is Meggatel's goal to transition its Lifeline customers that are no longer eligible for Lifeline because their financial situation has improved to its Mega-Mobile non-Lifeline prepaid wireless service. Meggatel intends to serve its customers on a long-term basis, even through transitions in Lifeline eligibility.

E. Activation and Non-Usage

Meggatel will not consider a Lifeline subscriber activated, and will not seek reimbursement for Lifeline service for that subscriber; until the subscriber activates Meggatel Lifeline service by affirmatively acknowledging that they are the applicant and that they have applied for and wish to receive Lifeline service from Meggatel. For customers that enroll in person with a Meggatel employee, the phone will be activated by making an outbound call. For customers that enroll online or over the phone and are mailed a phone, the customer must call Meggatel customer service and provide identification information to activate the phone.

After service activation, if during any 30 days of non-use, Meggatel will provide notice to the subscriber that failure to use the Lifeline service or provide other confirmation directly to Meggatel 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 at the end of

60 days of non-activity.[33] Customers will have the option to retain the service by: (1) making a monthly payment; (2) completing an outbound call; (3) purchasing minutes from Meggatel to add to the subscriber's plan; (4) answering an incoming call from a party other than Meggatel; or (5) responding to a direct contact from Meggatel confirming that the subscriber wants to continue receiving the service.[34]

If the subscriber does not respond to the notice as provided above, the subscriber will be de-enrolled from the Lifeline program and Meggatel will not request further Lifeline reimbursement for the subscriber. Meggatel will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[35]

F. Additional Measures to Prevent Fraud, Waste and Abuse

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

In addition to checking the National Lifeline Accountability Database contemplated in the *Lifeline Reform Order* (the "Database") when it becomes available, Meggatel employees shall emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this

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32 *See Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

33 *See Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

34 *See Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

restriction. All Meggatel employees interacting with existing and potential Lifeline customers undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. All employees of Meggatel must sign and return to Meggatel the "Acknowledgement of Receipt" of the training manual that they receive as part of their training.

Each employee must have a signed copy of the Code of Conduct on file with Meggatel in order to enroll customers for Meggatel. All employees will have access to customer service and/or corporate personnel for any issues or questions regarding Lifeline eligibility.

National Lifeline Accountability Database. When the Database becomes available, Meggatel will comply with the requirements of new rule section 54.404. Meggatel will query the Database to determine whether an applicant is currently receiving Lifeline service from another ETC and whether anyone else living at the applicant's residence is currently receiving Lifeline service.[36]

One-Per-Household. Meggatel will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household[37] through the use of its

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35 *See Lifeline Reform Order,* ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. *See id*., ¶¶ 189-195; section 54.404(b)(6). Further, Meggatel will update each subscriber's information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

36 A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to

application/certification forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for Lifeline service, Meggatel will search its own internal records to ensure that it does not already provide Lifeline supported service to someone at the same residential address.[38] If so, and the applicant lives at an address with multiple households, Meggatel will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a customer's failure to make the required one-per-household certification (i.e., de-enrollment).[39] Further, if an applicant provides a temporary address on his or her application/certification form collected as described above, Meggatel will verify with the applicant/subscriber every 90 days that the address provided in the application/certification remains valid.[40]

In addition, Meggatel employees will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and assist in determining whether he or she is

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be part of the same household as their parents or guardians. *See Lifeline Reform Order*, ¶ 74; section 54.400(h).

[37] *See Lifeline Reform Order*, ¶ 78.

[38] *See id.* The USAC worksheet is available at *http://www.usac.org/li/tools/news/default.aspx#582*.

[40] *See Lifeline Reform Order*, ¶ 89.

already benefiting from Lifeline support, by informing the customer that not all Lifeline services are currently marketed under the name Lifeline. Meggatel will also ask each customer whether they are receiving Lifeline service from one of the other major Lifeline providers in the state (e.g., SafeLink, Assurance).

Further, at the time of enrollment, Meggatel will check each applicant against a pooled duplicates database established by Veri-Fly Data Corporation, a multi data base search engine along with CGM, LLC. Meggatel's subscriber list will be in the pooled database for other ETCs to check against and Meggatel is building the systems necessary to interface with the pooled database and check for duplicates. Finally, Meggatel will participate in the In-Depth Validation process with the Commission and USAC to locate and address duplicates between ETCs in various states.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, Meggatel will include the following information regarding its Lifeline service on all marketing materials describing the service; (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) Lifeline service is non-transferable, (4) only eligible customers may enroll in the Lifeline program, (5) the Lifeline program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Meggatel's name (the ETC).[41] These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in Meggatel's Lifeline service offering, as well as Meggatel's application/certification forms and annual re-certification forms.[42] This

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40 *See Lifeline Reform Order*, ¶ 275; section 54.405(c).

41 *Id.*

specifically includes Meggatel's website (www.meggatel.com) and any outdoor signage.[43] Samples of Meggatel's marketing materials are included in Exhibit E. In addition, Meggatel's application/certification form will state that customers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine, imprisonment or being barred from the program.

G. Meggatel Reimbursements from the Fund

To ensure that Meggatel does not seek reimbursement from the Fund without a subscriber's consent, Meggatel will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.[44] Further, Meggatel will submit its FCC Forms 497 & 498 from the second to the eighth day of each month in order to be reimbursed the same month.[45] In addition, Meggatel will keep accurate records as directed by USAC[46] and as required by new section 54.417 of the Commission's rules.

For example, Meggatel will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that Meggatel queried the duplicates database; 2) date and information that Meggatel transmitted to the duplicates database; 3) date of transmission of updated customer information to database; 4) date and database upon which the ETC determined income-based eligibility where available; 5) date

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42 *Id.*

43 *See Lifeline Reform Order*, ¶ 128; section 54.407(d).

44 *See Lifeline Reform Order*, ¶¶ 302-306.

45 *See* section 54.407(e).

and documentation/data source used to determine income-based eligibility if no database was available to determine subscriber eligibility;[47] 6) date, database, and program on which ETC determined subscriber eligibility; 7) date and records detailing the documentation a subscriber provided to demonstrate Lifeline eligibility; 8) state Lifeline administrator documentation of customer eligibility, and subscriber's certification of eligibility; 9) date of customer service activation; 10) application/certification and annual re-certification forms for each subscriber associated with a date and time of signature; and 11) date of transmission of customer de-enrollment to database.

H. Annual Meggatel Certifications

Meggatel will submit an annual certification to USAC, signed by a Meggatel officer under penalty of perjury, that Meggatel: (1) has policies and procedures in place to review customers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;[48] (2) is in compliance with all federal Lifeline certification procedures;[49] and (3) has obtained a valid certification form for each customer for whom the carrier seeks Lifeline reimbursement.[50]

In addition, Meggatel will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).[51] Further, as discussed above,

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46 Such documentation includes the documentation listed in Section I.B. *supra*.

48 *See Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

49 *See Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

50 *See* section 54.416(a)(3).

51 *See Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

Meggatel will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[52]

Meggatel will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,[53] the company name, names of Meggatel's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.[54] Meggatel will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income customers during the previous year, including the number of minutes provided and whether there are additional charges to the customer for service, including minutes of use and/or toll calls.[55] Finally, Meggatel will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and customer protection rules, as well as a certification that Meggatel is able to function in emergency situations.[56]

I. Cooperation with State and Federal Regulators

Meggatel has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, Meggatel will:

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities

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52 *See Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

53 *See Lifeline Reform Order*, section 54.422(c).

54 *See Lifeline Reform Order*, ¶¶ 296,390; section 54.422(a).

55 *See Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

56 *See Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

commission where Meggatel operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;[57]

- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;

- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

- Immediately de-enroll any customer whom Meggatel has a reasonable basis to believe[58] is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

II. Description of Lifeline Service Offerings[59]

Meggatel will offer its non-Lifeline Mega-Mobile prepaid wireless services in all areas where it provides Lifeline service. Meggatel will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying provider(s) AT&T, Verizon Wireless, Sprint and/or T-Mobile. Meggatel's Lifeline offering will provide customers not residing on tribal lands with 250 anytime talk and text messaging at a rate of 3 texts per voice minute per month at no charge without rollover. Customers residing on federally-recognized tribal lands can purchase a plan with 1,000 minutes and up to 3,000 text messages for $1.00 or a plan with unlimited talk and text for $4.75.

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57 Meggatel anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

58 *See* section 54.405(e)(1).

59 *See* Compliance Plan Public Notice at 3.

Lifeline customers will be able to purchase additional bundles of minutes, available in 30 day increments, including text messaging or data service. Standard replenishment plan pricing and terms are as follows for residents on tribal and non-tribal land:

Reload Minutes

- 100 minutes, up to 300 text messages or 5MB data for $7.00
- 500 minutes, up to 1,500 text messages or 20MB data for $20.00
- 1,000 minutes, up to 3,000 text messages or 30MB data for $35.25
- Unlimited Talk and Text $39.00

Meggatel's replenishment plans can be purchased in-person, at events, at brick and mortar stores, via the Internet, direct mail and by phone. Additional information regarding Meggatel's plans, rates and services can be found on its website www.meggatel.com.

In addition to free voice services, Meggatel's Lifeline plan will include a compliant 911 and E911 handset and custom calling features at no charge, including Caller ID, Call Waiting, Call Forwarding, 3-Way Calling and Voicemail. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation[60]

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.[61] The

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60 *See* Compliance Plan Public Notice at 3.

61 *See Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Meggatel also operates a retail business named, "Mega-Mobile" that provides multiple plans to non-Lifeline customers. Meggatel opened its first Mega-Mobile store in Bedford, Texas on November 28, 2012 and will be opening its second store in San Antonio shortly. Meggatel will not be relying exclusively on Lifeline reimbursement for Meggatel's operating revenues. Meggatel will receive revenues from Mega-Mobile and also has access to other financial resources including substantial cash reserves of its owners. Meggatel has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

Service Requirements Applicable to Meggatel's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."[62] Meggatel certifies that it will comply with the service requirements applicable to the support Meggatel receives.[63] Meggatel will provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified customers throughout the states in which it is designated as an ETC. Meggatel's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, Meggatel's service offerings will

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62 Compliance Plan Public Notice at 3.

63 47 C.F.R. § 54.202(a)(1).

provide its customers with a set number of minutes of use for local service at no charge to the customer.

Meggatel also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, Meggatel will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Meggatel will not provide toll limitation service ("TLS"). Meggatel, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.[64]

Finally, Section 54.202(a)(3) of the Commission's rules states that a wireless applicant's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this consumer protection and service quality requirement. Meggatel intends to fully comply with applicable consumer protection requirements and commits to comply with the CTIA Consumer Code. Meggatel agrees to comply with the CTIA Consumer Code to ensure it offers its subscribers the highest level of protection and quality service.[65] Meggatel's pledge to provide quality service and voluntarily to comply with this code evidences its commitment to satisfying all of the applicable consumer protection and service quality standards.

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64 *See Lifeline Reform Order*, ¶ 230.

65 *See* 47 C.F.R. § 54.202(a)(3).

IV. Conclusion

Meggatel submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, Meggatel respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,

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Counsel to Meggatel Corporation

December 17, 2012

EXHIBIT A

Veri-Fly's CompleteID™ Lifeline Enrollment Platform

Meggatel Corporation will make use of the ***CompleteID™ Lifeline Enrollment Platform*** provided by Veri-Fly Data Corporation (Veri-Fly) in order to comply with the Commission's Rule significant and will offer eligible Consumers Lifeline service through the following methods.

Veri-Fly's CompleteID™ Lifeline Enrollment

1. Store/Facility Enrollment
2. Community Event Enrollment
3. Direct/Return Mail Enrollment
4. Toll-Free Fax Enrollment - 877-932-4933 Meggatel
5. Toll-Free IVR Enrollment – 855-488-1936 Meggatel
6. Web Enrollment – www.meggatel.com
7. Kiosk Enrollment - Tablet
8. Field Enrollment - Tablet

In use of this real-time Lifeline Enrollment Platform, Meggatel will subscribe to the following validation procedures.

Veri-Fly's CompleteID™ Lifeline Validation Services

1. Service Availability Validation
    a. Meggatel will verify that only eligible Consumers within its approved ILEC footprint are offered Enrollment through a correlation of geo-spatial address data and NPA/NXX databases.
2. Tribal Availability Validation
    a. Meggatel will verify that only eligible Consumers within its approved Tribal Lands are offered Enhanced/Tribal Lifeline Enrollment through a correlation of geo-spatial address data and Bureau of Indian Affairs (BIA) data subsets.

3. Address Validation

    a. Meggatel will verify that only eligible Consumers who have a verifiable and normalized Postal Address are offered Enrollment through the use of Melissa Data's address Validation databases.

4. Subsidy Validation

    a. Meggatel will verify that only eligible Consumers with acceptable Proof of Program or Income Qualification are offered Enrollment through:

        i. Where available, through the use of State, Federal, or Program Administrator databases.

        ii. Review and documentation of Consumer Proof Qualifications by Meggatel Employees and/or Agents.

5. Duplicate Address Validation

    a. Meggatel will verify that only eligible Consumers who reside at addresses with Multiple Households and fulfill the Multi-Household Worksheet requirements are offered Enrollment through the use of its internal Subscriber databases.

6. Duplicate Identity Validation

    a. Meggatel will verify that only eligible Consumers who have not received Lifeline service from Meggatel previously are offered Enrollment through the use of Veri-Fly's identity databases.

7. Identity Validation

    a. Meggatel will verify that only eligible Consumers who have a verifiable identity are offered Lifeline service through the use of LexisNexis' aggregate identity databases.

8. External Pooled Database Validation

    a. Meggatel intends to verify that only eligible Consumers who are not presently receiving service from other ETC carriers participating in the External Pooled Database are offered Enrollment through the use of CGM, LLC's pooled Subscriber databases.

9. Lifeline Accountability Database (LAD) Validation

    a. When available, Meggatel will verify that only eligible Consumers who are not presently receiving Lifeline service from any other ETC are offered Enrollment through the Lifeline Accountability Database.

EXHIBIT B

Application/Certification Form

Texas Wireless Lifeline Service Application

When completed, mail or fax form to:
520 Silicon Drive, Suite 110
Southlake, TX 76092
Service: 1-855-488-1936 Fax 1-877-932-4933

A complete and signed Lifeline Application and Certification Form ("Application") is required to enroll your household in Meggatel Corporation ("Meggatel") Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated by Meggatel. Applicants must personally activate Meggatel's Lifeline service by calling 1-855-488-1936.

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

I (Applicant) participate in at least one of the following programs, and am able to verify my identity and participation as required.

Qualifying Program Code: ☐ I am an eligible resident of Tribal Lands.

If Qualifying for Lifeline by **Income** (codes 301 or 303) :

Number of Individuals in My Household:

Household Annual Income $ .00

Subsidy Program Codes	
441	Medicaid (**not** Medicare)
443	Supplemental Nutrition Assistance Program (SNAP)
444	Supplemental Security Income (SSI)
445	National School Lunch Program (NSL)
446	Temporary Assistance for Needy Families (TANF)
447	Tribally Administered TANF (TATANF)
448	Federal Public Housing Assistance (FPHA)
449	Low Income Home Energy Assistance Program (LIHEAP)
450	Bureau of Indian Affairs General Assistance (BIA)
451	Food Distribution Program on Indian Reservations (FDPIR)
452	Children's Health Insurance Program (CHIP)
301	Head Start (meeting **income** qualifying standards)
303	Household **income** is at or below 135% of the Federal Poverty Guidelines (FPG)

First Name (required) M.I.

Last Name (required)

☐ **The address provided below is a temporary address.**

☐ **The address provided below is a Multi-Household residence. (requires worksheet)**

Residing Address (No P.O. Boxes; Must be your principal address): (required) Apt/Floor/Suite/Other

City (req'd) State (req'd) Zip (req'd)

Shipping Address ☐ Shipping address same as above Apt/Floor/Suite/Other

City State Zip

Contact Telephone Number (Including Area Code) - - Date of Birth (MM-DD-YYYY) (required) - - Last 4 Digits of SSN (required)

Driver's License or State ID Card Number DL or ID State

I (Applicant) certify, under penalty of perjury, that [check ALL boxes to qualify]:

- ☐ I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I futher understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligbility criteria for Lifeline service or program-based eligibility criteria for Lifeline service and will notify Meggatel within thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required. I realize that this certification is made under penalty of perjury and I may be subject to penalties for failure to comply with this requirement.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify Meggatel of my new address within 30 days.
- ☐ If I provided a temporary residential address to Meggatel, I will verify my temporary residential address every 90 days.
- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of re-certification as are applicable to the initial application.
- ☐ I authorize Meggatel to access any records required to verify my statements on this form and to confirm my eligibility for the Meggatel Lifeline credit. I give permission to the duly authorized officials administering the above programs to provide to Meggatel my participation status in any of the above programs. I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by Meggatel as confidential customer account information.
- ☐ I authorize Meggatel to release any records required for the administration of the Meggatel Lifeline credit program (including my name, telephone number and address), 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 denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, **my household is not currently receiving a Lifeline-supported service from any other provider.**
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).
- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct to the best of my knowledge and belief.

Applicant's Signature (required)

Date MM-DD-YYYY ☐☐ - ☐☐ - ☐☐☐☐

I hereby attest that the Applicant's ID and supporting documentation checked below were presented.

Agent Signature (required)

Each household will be required to verify continued eligibility for Lifeline program participation on at least an annual basis. Where such eligibility cannot be validated through a state and/or federal database or other alternative means, customer will be required to submit an annual re-certification form.

All Fields Below are Required

Agent Name: (e.g. BILL SMITH)

Agent Username (e.g. BSMITH)

Corp ID/Dealer Number (e.g. 1002)

For Agent Use Only (check only 1 box below; do not retain documentation):

Documents Acceptable as Proof for Program-Eligibility:

- ☐ Program participation documents (e.g., the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card or copy thereof)
  - ☐ The current or prior year's statement of benefits from a qualifying state, federal, or Tribal Program
- ☐ A notice of participation in a qualifying state, federal or Tribal program
  - ☐ Other official document evidencing participation: _____

For Subsidy proof document: (1 of 3 Proof Fields Required)

Effective: MM-DD-YYYY ☐☐ - ☐☐ - ☐☐☐☐

Expires: MM-DD-YYYY ☐☐ - ☐☐ - ☐☐☐☐

Documents Acceptable as Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return
- ☐ Current income statement from an employer or paycheck stub
  - ☐ A Social Security statement of benefits
- ☐ A Veteran's Administration statement of benefits
  - ☐ A retirement/pension statement of benefits
- ☐ An Unemployment/Workmen's Compensation statement of benefits
  - ☐ Federal or Tribal notice of participation in General Assistance
- ☐ A divorce decree, child support award, or other official document containing income information for at least three consecutive month's time.

Last 4 digits of proof

Qualifying Program Code of Document Reviewed by Agent (From Page 1) _____

In order for your Lifeline account to remain active, we require that you use your Lifeline supported wireless service at least once per month.

Lifeline Multi-Household Worksheet

Answer the questions below to determine whether there is more than one household residing at your address.

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

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you) .

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household **expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income** includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

1. Does your spouse or registered domestic partner (that is, someone you are married to or in a legally-recognized relationship with) already receive a Lifeline-discounted phone? (check "NO" if you do not have a spouse or partner) **(Required)**

☐ **YES** ☐ **NO**

► If you checked **YES**, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.

► If you checked **NO**, please answer question #2 below.

2. Other than a spouse or domestic partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

A. A parent	☐ **YES**	☐ **NO**	D. An adult roommate	☐ **YES**	☐ **NO**
B. An adult son or daughter	☐ **YES**	☐ **NO**	E. Other _____	☐ **YES**	☐ **NO**
C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.)	☐ **YES**	☐ **NO**			

► If you checked **NO** for each statement above, you do not need to answer the remaining questions. Please initial line "B" below and sign & date this worksheet.

► If you checked **YES**, please answer question #3 below.

3. Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?

☐ **YES** ☐ **NO**

► If you checked **NO**, then your address includes **more than one household**. Please initial lines "A" and "B" below, and sign & date the worksheet.

► If you checked **YES**, then your address includes only **one household**. You may not sign up for Lifeline because someone in your household already receives Lifeline.

Please initial the certifications below and sign and date this worksheet. Submit this worksheet to Meggatel along with your Lifeline application.

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

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

Signature _____ Date _____

EXHIBIT C

Income Eligibility

Meggatel Corporation Lifeline Service Application Income Eligibility Worksheet

Individuals in all states are able to enroll in the Lifeline program by demonstrating that their household's annual is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

HOUSEHOLD SIZE	INCOME LEVEL
1	$15,080
2	$20,426
3	$25,772
4	$31,118
5	$36,464
6	$41,810
7	$47,156
8	$52,502
For each additional person	Add $5,346

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- the prior year's state, federal or Tribal tax return
- current income statement from an employer or paycheck stub
- a Social Security statement of benefits
- a Veterans Administration statement of benefits
- a retirement/pension statement of benefits
- an Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- a divorce decree, child support award, or other official document containing income information for at least three consecutive months' time

This is a Lifeline service provided by Meggatel Corporation. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wire line. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.

EXHIBIT D

Marketing Material

FREE
CELLPHONE & MINUTES

SIGN UP TODAY AT

WWW.MEGGATEL.COM

- ✓ FREE WIRELESS PHONE
- ✓ FREE VOICEMAIL
- ✓ FREE LONG DISTANCE
- ✓ FREE 411

✗ NO DEPOSIT ✗ NO CREDIT CHECKS ✗ NO CONTRACT

250 FREE
MINUTES EVERY MONTH
500 & 1000 MINUTE PLANS
ALSO AVAILABLE

MUST BE ELIGIBLE TO QUALIFY

•THIS IS A LIFELINE SERVICE PROVIDED BY MEGGATEL CORPORATION, WHICH IS AN ELIGIBLE TELECOMMUNICATIONS CARRIER. • LIFELINE IS A GOVERNMENT ASSISTANCE PROGRAM. • SERVICE IS NON-TRANSFERABLE. • ONLY ONE LIFELINE DISCOUNT MAY BE RECEIVED PER HOUSEHOLD. • ONLY ELIGIBLE CONSUMERS MAY ENROLL IN THE PROGRAM. • CONSUMERS WHO WILLFULLY MAKE A FALSE STATEMENT IN ORDER TO OBTAIN THE LIFELINE BENEFIT CAN BE PUNISHED BY FINE OR IMPRISONMENT OR CAN BE BARRED FROM THE PROGRAM. • CUSTOMERS MUST PRESENT PROPER DOCUMENTATION CONFIRMING ELIGIBILITY FOR THE LIFELINE PROGRAM THROUGH PARTICIPATION IN FEDERAL PUBLIC HOUSING ASSISTANCE, FOOD STAMPS, LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP), INCOME BELOW 135% OF THE FEDERAL POVERTY GUIDELINES, MEDICAID, NATIONAL SCHOOL LUNCH'S FREE LUNCH PROGRAM, SUPPLEMENTAL SECURITY INCOME (SSI), TEMPORARY ASSISTANCE TO NEEDY FAMILIES (TANF), ADDITIONAL PROGRAM BASED ELIGIBILITY CRITERIA VARIES BY STATE. PROOF OF ELIGIBILITY INCLUDES AN ELIGIBLE PROGRAM CARD OR STATEMENT OF BENEFITS.