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
	)	
Federal-State Joint Board on Universal Service	)	WC Docket No. 11-42
	)	
Prepaid Wireless Retail, LLC Compliance Plan	)	

PREPAID WIRELESS RETAIL, LLC'S COMPLIANCE PLAN

Prepaid Wireless Retail, LLC, dba Odin Wireless, hereby files its Compliance Plan providing specific information regarding Odin Wireless' service offerings and outlining the measures it has taken to implement the obligations contained in the *Lifeline Modernization Order*.[1] Pursuant to the *Lifeline Modernization Order*, the Federal Communications Commission (the "Commission") decided to forbear from applying the facilities requirement of section 214(e)(1)(A) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the "Act"), to telecommunications carriers seeking limited

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[1] *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42; WC Docket No. 03-109; CC Docket No. 96-45; WC Docket No. 12-23 (rel. February 6, 2012) ("*Lifeline Modernization Order*").

designation as a Lifeline-only eligible telecommunications carrier ("ETC"), subject to the following conditions: (1) the carrier must comply with certain 911 requirements; and (2) the Commission must approve the telecommunication carrier's compliance plan.[2]

Further the Commission explained that neither state commissions nor the Commission may grant additional Lifeline-only ETC applications after December 29, 2011, until the Bureau approves the telecommunications carrier's compliance plan.[3] ETCs, however, may continue to receive reimbursement for Lifeline service "pending approval of their compliance plans in the states in which they currently serve Lifeline subscribers."[4] The instant Compliance Plan is intended to satisfy the Commission's requirement that Odin Wireless file, and the Commission approve, a compliance plan in order for the Commission to forbear from applying the facilities requirement of section 214(e)(1) of the Act with respect to Odin Wireless. This Compliance Plan includes all of the elements required by the Commission's Public Notice, dated February 29, 2012.

I. BACKGROUND

Odin Wireless' mission is to provide unprecedented levels of service and value to persons who are blind and visually impaired. This mission is unique in the wireless industry. To the extent that any carrier makes an effort to address the needs of this community, it is as an afterthought. Odin Wireless, on the other hand, will make accessibility its primary mission.

Odin Wireless will implement its mission in a number of ways, including selling handsets with the very best accessibility features, insuring that its website is fully accessible, describing in

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2 *See id.* at ¶ 368.
3 *See id.* at ¶ 380.
4 *See id.*

detail on its website the accessibility features of its handsets so that its customers have the required information to make informed decisions, and providing its customer service representatives with the unique skills and knowledge required to serve the needs of its customers.

Moreover, Odin Wireless will not passively accept and sell handsets that are already sold in the market. It will work tirelessly with manufacturers to innovate and develop new handsets, including smart phones, that improve ease-of-use, offer applications and digital content that benefit the blind and visually impaired and expand accessibility. Further, Odin Wireless will operate on T-Mobile's GSM network, which will provide the company a much larger pool of handsets and manufacturers from which to select and develop devices that are accessible.

Odin Wireless was formed on September 14, 2012. Its holding company is Prepaid Wireless Group, LLC ("PWG"). PWG is owned, either directly or indirectly primarily by four individuals, none of whom hold a majority interest in PWG.[5] In addition, Odin Wireless has a sister company, Prepaid Wireless Wholesale, LLC ("PWW"). PWW offers wholesale GSM services on T-Mobile's network. Its customers include providers that offer both Lifeline and non-Lifeline services. Moreover, Odin Wireless has the following additional affiliates: (1) Cintex Group, LLC ("Cintex Group"), and (2) Cintex Wireless, LLC ("Cintex Wireless"). Cintex Wireless provides retail services on Sprint's CDMA network, while Cintex Group provides wholesale services on Sprint's CDMA network. Cintex Wireless and Cintex Group are affiliated with Odin Wireless by virtue of the fact that they have common ownership as set forth in Section 3(1) of the Communications Act of 1934, as Amended.[6]

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[5] In addition, a small number of employees will receive minor equity interests in PWG.

[6] 47 U.S.C. § 153(1).

Odin Wireless is both financially and technically capable of providing Lifeline service.[7] In the first instance, Odin Wireless anticipates that the significant majority of its revenue will be generated from non-lifeline sources. To be clear, Odin Wireless' service is a non-lifeline service. Lifeline will simply make the service more affordable to lower income individuals. In the second instance, Odin Wireless' affiliates will generate substantial revenue from sources other than reimbursements from the Universal Service Administrative Company. Specifically, both Cintex Group and PWW will generate substantial revenue from wholesale services. Technical capability is demonstrated by the fact that (i) its executives have many years of experience in the telecommunications industry, (ii) BeQuick Software, Inc. provides its back-end support, and (iii) CGM, LLC will provide it with compliance services.

On December 7, 2012, Odin Wireless filed with the Commission, a Petition of Prepaid Wireless Retail, LLC for Designation as an Eligible Telecommunications Carrier on a Wireless Basis in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, Texas and Virginia. Odin Wireless has not yet filed petitions to be designated an ETC with any state commission but will do so in the near future.

II. CERTIFICATION OF LIFELINE APPLICANTS' ELIGIBILITY

A. Policy

Odin Wireless will seek reimbursement for Lifeline service only for those consumers who qualify for Lifeline service pursuant to Commission rule 54.409, or who qualify under additional program or income criteria adopted by the states. In addition, Odin Wireless will comply with the Commission's requirements for initial eligibility certification and annual eligibility re-certification.

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[7] 47 C.F.R. § 54.202(a)(4).

B. Initial Eligibility Certification Procedures

Odin Wireless is committed to the integrity of the Lifeline program and will implement certification procedures consistent with Commission rule 54.410 to ensure that its subscribers qualify for Lifeline.

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

Therefore, all subscribers will be required 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 Commission rule 54.409(a)(2) or 54.409(a)(3). The manner in which each subscriber is eligible is captured by Odin Wireless in two locations: (1) on the application forms for Lifeline services; and (2) in Odin Wireless's back-end system, called "Fusion," which was developed, and is managed, by BeQuick Software, Inc. ("BeQuick"). In addition, through the certification requirements and other policies described below, Odin Wireless 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.

Marketing material. Odin Wireless marketing material, including its website, will include detailed information regarding its Lifeline plans and eligibility criteria. Eligibility criteria will reflect those set forth in the *Lifeline Modernization Order*, and may also include eligibility criteria established by the states, if applicable. All Odin Wireless employees and representatives who are involved in enrolling Lifeline subscribers, will undergo training

regarding the eligibility criteria. In addition, all documentation, including marketing material, sales scripts, websites and applications, will reflect the eligibility criteria.

All Odin Wireless marketing material will also explain in easily understood language that the offering is a Lifeline supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and that the program is limited to one benefit per household, consisting of either wireline or wireless service. The marketing material will also explain that Lifeline is a government benefit program and that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Additionally, Odin Wireless marketing material will disclose the details of its Lifeline offering, as well as always make it clear that Odin Wireless is the carrier that will provide the Lifeline service. Odin Wireless' marketing group will be trained regarding these marketing disclosure requirements.

Odin Wireless marketing material, as well as its communications with its customers generally, will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service. All Odin Wireless marketing material will be reviewed by its attorney prior to use.

Certification form and supporting documentation. Attached as Exhibit 1 is a copy of the Odin Wireless certification form. Every applicant will be required to complete a certification form[8] or enroll over the phone. Applicants that do not complete the form in person will be required to submit a completed and signed certification form to Odin Wireless by mail, facsimile,

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[8] Odin Wireless uses certification forms in both paper and electronic form. Electronic certification forms are presented to applicants on tablets during the in-person sales process. The forms were developed by CGM, LLC ("CGM") and are fully integrated into Fusion, Odin Wireless' back-end system. The tablet also allows the sales person to do a real time duplicate check, as well as verify applicant eligibility with certain state databases.

electronic mail or other electronic transmission, inclusive of the documentation. If an applicant enrolls over the phone, the applicant will be led through the same certification process that is present on the certification form. Odin Wireless will use the documentation to verify a consumer's eligibility to receive Odin Wireless's lifeline service, unless a state database or state agency verifies eligibility.

Odin Wireless' certification form provides information, requests information and requires that each applicant make certain certifications, consistent with Commission rule 54.410(d). The certifications will be explained to consumers when they enroll in person or over the phone.

All certification forms will be reviewed by Odin Wireless employees, who will also be trained to review and determine whether the supporting documentation is sufficient to establish income-based qualification or program-based qualification. The supporting documentation must be of a type identified in Commission rule 54.410(c)(1)(i)(B) or 54.410(c)(1)(iii). Odin Wireless will not provide Lifeline service to consumers who have not provided such documentation, unless their eligibility has been confirmed by a federal or state database or by a state agency. Odin Wireless will not retain the documentation.

Odin Wireless anticipates that because its customers are blind, the large majority of applicants will certify over the phone. The calls will be recorded and the recordings attached to each applicant's account so that they can be retrieved easily in the event of an audit.

For applications in which Odin Wireless receives documentation proving eligibility, Odin Wireless captures certain information related to that documentation in order to demonstrate, in the event of an audit, that it has reviewed the documentation. Specifically, Odin Wireless captures the following: (i) the type of documentation reviewed, (ii) the date or expiration date of the documentation (where available), (iii) the date the documentation was reviewed, (iv) the

manner in which the documentation was provided (e.g., in person, fax . . . etc), (v) the ID of the employee who reviewed the documentation, and (vi) the name on the documentation. Significantly, all documentation is reviewed by Odin Wireless employees who are compensated on an hourly basis. Accordingly, the employees are not rewarded in any way for approving more applications.

Face-to-face sales and inquiries to Odin Wireless customer care. In the case of face-to-face sales and inquiries to Odin Wireless customer care regarding the Odin Wireless Lifeline service and applicable eligibility criteria, all Odin Wireless representatives will be trained to assist Lifeline applicants determine whether they are eligible to participate in Lifeline. These persons will be trained to answer questions regarding eligibility criteria and the definition of a "household" (i.e., what constitutes a "household"). All documentation collected by Odin Wireless representatives engaged in face-to-face sales will be reviewed at Odin Wireless headquarters to double check its validity. Odin Wireless does not rely on agents or contractors to perform this review on its behalf. Notwithstanding the above, however, Odin Wireless does not anticipate acquiring many customers through face-to-face sales. Rather, most of its customers will be acquired through highly respected associations such as the congressionally chartered Blinded Veterans Association.

In addition, Odin Wireless representatives will verbally ask each applicant whether they or anyone else in their household currently receive Lifeline support from any other telephone provider. If the applicant answers in the affirmative, the applicant will be informed that they are not eligible for the Odin Wireless Lifeline offering. Odin Wireless representatives will also explain to applicants that if they do not use their Lifeline service for 60 consecutive days, their service may be deactivated and that customers must recertify their eligibility each year. As noted

previously, the certification process followed for in-person sales will include a tablet application developed by CGM.

Eligibility database or state agency. Where available, Odin Wireless will verify a subscriber's eligibility by accessing a federal or state database or through a state agency. In these cases, Fusion will dip into the relevant database real time in order to confirm eligibility. If eligibility cannot be confirmed by the database, an error message is generated and the applicant cannot be enrolled in Lifeline. Further, if a state or federal database is used, Fusion will capture the following information for each customer: (i) the name of the database queried, (ii) the date the database was queried, and (iii) confirmation by our employee that the database confirmed eligibility. Alternately, if a state agency confirmed eligibility, Fusion will capture the following: (i) the name of the agency consulted, (ii) the agency contact, and (iii) a copy of the notice provided by the agency that confirms eligibility.

If a database or state agency is not available to confirm eligibility, Odin Wireless will require the consumer to provide documentation proving eligibility. Odin Wireless will not provide Lifeline service or seek reimbursement from the USAC for ineligible applicants.

De-enrollment for ineligibility. If Odin Wireless has a reasonable basis to believe that one of its Lifeline customers no longer meets the eligibility criteria, Odin Wireless will notify the customer of impending termination in writing via email or letter and provide the subscriber 30 days to demonstrate continued eligibility. The message will include the following language: "URGENT: we have reason to believe that you no longer qualify for your Odin Wireless Lifeline service. If you do not contact Odin Wireless at 877-304-9183, and confirm your eligibility, your Lifeline service will be terminated in 30 days." A demonstration of eligibility must comply with

the annual verification procedures found in new rule 54.410(f), including the submission of a completed and signed certification form.

Furthermore, in the event that a customer requests that Odin Wireless deactivate their Lifeline service, Odin Wireless will do so immediately. The 30-day notice period will not apply to such requests.

C. Annual Eligibility Re-Certification

Odin Wireless will attempt to re-certify all subscribers enrolled in its Lifeline program on an annual basis. For 2013, Odin Wireless may elect to have USAC administer the re-certification process on its behalf. If Odin Wireless recertifies its customers itself, it will do so by accessing a federal or state database, if available. If a database is not available, Odin Wireless will obtain from the consumer a signed certification, consistent with Commission rule 54.410(d). The re-certification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline service and that if the customer fails to respond, he or she will be de-enrolled from the program. Odin Wireless anticipates that the majority of its subscribers will recertify by IVR or through recorded calls from Odin Wireless customer service. The IVR "results" will be passed into fusion, and recordings of phone calls will be attached as WAV files to each customer's account. Odin Wireless will also provide its subscribers the option of recertifying via the web.

Odin Wireless will make applicants aware of the re-certification requirement (i) at the point of sale, (ii) on the certification form, (iii) on its website, and (iv) on telephone calls used to certify customers. With respect to the point of sale, Odin Wireless will train its representatives who perform face-to-face sales to make applicants aware of the re-certification requirement.

Odin Wireless will initiate a de-enrollment process for those subscribers that it or USAC is unable to re-certify. Pursuant to this process, Odin Wireless will send subscribers, via postcards or email, notification of impending termination. Odin Wireless will provide subscribers 30 days following the date of the written notification, in which to demonstrate ongoing eligibility for Lifeline. If the customer fails to demonstrate eligibility within this time frame, Odin Wireless will de-enroll the customer within five business days after expiration of the subscriber's time to respond to the re-certification efforts.

If Odin Wireless cannot verify addresses via a state or federal database, Odin Wireless will contact each subscriber to obtain a valid address; Odin Wireless will do so during the annual certification process.

III. MEASURES TO PREVENT DUPLICATE LIFELINE BENEFITS

Odin Wireless is committed to minimizing waste, fraud and abuse in the Lifeline program. Accordingly, in order to prevent duplicate Lifeline benefits, Odin Wireless will, consistent with Commission rule 54.404, query either the National Lifeline Accountability Database or a state database that has been approved by the Commission. Such queries will determine whether a subscriber, or someone else at his or her residential address, is currently receiving a Lifeline benefit. If the applicant is already receiving a Lifeline benefit at that address, Odin Wireless will not seek Lifeline benefits for that applicant unless and until the consumer de-enrolls from the ETC from whom they are receiving service. If another person at the applicant's residential address is currently receiving Lifeline supported service, Odin Wireless will require the applicant to complete a "separate -household" document in order to demonstrate that the applicant and the current subscriber are part of separate households. Similar to proof of eligibility, the worksheet can be sent to Odin Wireless via fax, email or mail.

Significantly, even after the National Lifeline Accountability Database is operational, Odin Wireless will continue to implement a multi-faceted approach to minimizing duplicate Lifeline service. Odin Wireless' certification form, marketing material and in-person contacts will all emphasize the one per-household requirement. In addition, Odin Wireless will continue its internal database checks, even as it uses the National Lifeline Accountability Database.

In order to minimize duplicate Lifeline benefits prior to when the federal or state databases become available, Odin Wireless will implement **four** measures.

First, each applicant will be required to certify under penalty of perjury that the subscriber's household will receive only one Lifeline benefit and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline benefit.

Second, in face-to-face sales, as well as during phone calls, Odin Wireless representatives will ask the applicant the following: "Do you or anyone else in your household currently receive Lifeline support from any other telephone provider?" If the applicant answers "yes," he or she will not receive Lifeline service from Odin Wireless.

Third, all certification forms received by Odin Wireless will be reviewed to verify whether the applicant, or whether anyone at the applicant's address, is currently receiving Lifeline benefits from Odin Wireless or another ETC that is a client of CGM.

All Odin Wireless representatives who perform face-to-face sales will have tablets or computers on site and will check Odin Wireless's internal database, as well as CGM's database, to identify duplicate certifications on a real-time basis. If the applicant is already receiving a Lifeline benefit at that address he or she will not be enrolled in Lifeline, and Odin Wireless will not seek an additional Lifeline benefit for that applicant. If another person at the applicant's

residential address is currently receiving Lifeline supported service, Odin Wireless will require the applicant to complete a "separate household" worksheet in order to demonstrate that the applicant and the current subscriber are part of separate households.

Fourth, as explained above, Odin Wireless's marketing material will reinforce the limitation of one Lifeline phone per household. The following language will appear on the Odin Wireless website and in marketing materials in bold and in an offsetting color to ensure that it is not overlooked:

Note: By law, the Lifeline program is only available for one phone per household.

In the event that Odin Wireless learns from the National Lifeline Accountability Database, USAC, the Commission, a state commission, the customer, or through its own database, that a household is receiving more than one Lifeline benefit, the affected customer will be de-enrolled within five business days and Odin Wireless will not seek Lifeline reimbursement for service provided following the date of that customer's de-enrollment.

IV. COOPERATION WITH STATE AND FEDERAL REGULATORS

Odin Wireless will cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, Odin Wireless will:

- Make available subscriber data to USAC in order to help it create and maintain the National Lifeline Accountability Database;
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing 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 subscribers already receives Lifeline service from another carrier; and
- De-enroll within the applicable time period, any subscriber whom Odin Wireless has a reasonable basis to believe is receiving Lifeline-supported service from another ETC or knows is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

Odin Wireless will do everything possible to maintain good relations with state commissions. For example, the company will respond timely to customer complaints and to any inquiries by the state commissions.

V. NON-USAGE REQUIREMENTS

If a subscriber fails to "use" an Odin Wireless Lifeline plan for 60 consecutive days, Odin Wireless will provide the subscriber 30 days' written notice via text message, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within a 30-day notice period will result in termination of lifeline service. The text messages are sent out daily. A subscriber will be considered to have used the Lifeline service if he or she (i) completed an outbound call, (ii) purchased minutes from Odin Wireless to add to the subscriber's service plan, (iii) answered an incoming call from a party other than Odin Wireless or Odin Wireless' agent or representative; or (iv) responded to direct contact from Odin Wireless and confirms that he or she wants to continue receiving Lifeline service. If the subscriber uses the Lifeline service within 30 days of the Odin Wireless notice, Odin Wireless will not terminate the subscriber's Lifeline service. To avoid waste, Odin Wireless will not seek Lifeline support for subscribers who have not used the service for a consecutive 60-day period, unless the subscriber uses the

service within 30 days of the carrier providing notice of de-enrollment. This usage requirement, however, will not apply to customers who make a monthly payment; Odin Wireless anticipates that the majority of its customers, including its Lifeline customers, will make monthly payments.

Odin Wireless will make subscribers aware of this usage requirement and its impact on their Lifeline service, if any, in marketing material, its website, its certification, when subscribers call customer service for information on the Odin Wireless Lifeline program and in face-to-face sales.

In addition, Odin Wireless will not seek Lifeline support for a customer unless and until the subscriber activates the service and/or completes an outgoing call.

VI. ACCESS TO 911 AND E911 SERVICES

Odin Wireless will provide its Lifeline subscribers with access to 911 and E911 services inasmuch as these services have been deployed by its underlying carriers. Further, Odin Wireless will transmit a Lifeline subscriber's wireless 911 call, regardless of whether the subscriber has failed to satisfy the usage requirements and regardless of whether the account associated with the handset has been terminated. Odin Wireless will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service.

Odin Wireless will provide its Lifeline subscribers with E911-compliant handsets and replace, at no additional charge to its subscribers, noncompliant handsets of Lifeline-eligible customers.

Odin Wireless has the same ability to remain functional in emergency situations as its underlying carriers.

VII. ODIN WIRELESS SERVICE OFFERINGS

Odin Wireless will offer a number of rate plans. With one exception discussed in the succeeding paragraph, Lifeline and non-Lifeline customers will have access to the same plans.[9] The Lifeline monthly price will be the standard price, less $9.25. In addition, Odin will not charge its Lifeline customers a number portability charge.[10]

Odin Wireless will also offer a Lifeline-only plan. Eligible customers will receive 250 free anytime local and long distance minutes per month. Each text message will consume one minute. Unused minutes will not roll over from month-to-month. A blind accessible wireless handset will be provided to qualifying Lifeline customers.[11] The service will include caller ID, call waiting, call forwarding, 3-way calling and voicemail. All plans include domestic long-distance at no extra cost per minute. Calls to 911 emergency services are free, regardless of service activation or availability of minutes.

Odin Wireless certifies that its voice telephony services comply with the requirements of Commission rule 54.101. In particular, Odin Wireless provides voice grade access to the public switched network; minutes of use for local service at no additional charge; and access to emergency services provided by local government or other public organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.

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[9] Odin Wireless' rate plans are available at www.odinwireless.com.
[10] 47 C.F.R. § 54.401(e)(2012).
[11] The details of the Lifeline offering may change depending on the cost of an accessible handset. For example, if Odin Wireless can secure an accessible handset at a sufficiently low price, it will provide the handset to the customer free of charge. On the other hand, if the handset is sufficiently expensive, Odin Wireless may recoup some of the cost from the customer. Odin Wireless may also structure its Lifeline-only plan to require a small monthly fee, as well as a corresponding increase in the number of minutes provided.

The only toll service offered by Odin Wireless is international toll service. Lifeline Customers will have the option to shut off their international service or cap the maximum amount that they can spend at a certain amount. Both of these methods will provide customers control over the amount that they spend on toll service.

The terms and conditions of the Odin Wireless Lifeline service are posted on the Odin Wireless website at www.odinwireless.com.

VIII. REIMBURSEMENT FROM THE FUND

To ensure that Odin Wireless does not seek reimbursement from the Universal Service Fund without a customer's consent, Odin Wireless 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 customers for whom it is seeking reimbursement. In addition, Odin Wireless will keep accurate records as directed by USAC and as required by Commission rule 54.417.

IX. ANNUAL COMPANY CERTIFICATIONS

Odin Wireless will submit an annual certification to USAC, signed by a company officer under penalty of perjury, that Odin Wireless: (1) has policies and procedures in place to review consumers' proof of eligibility documentation and ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) is in compliance with all federal lifeline certification procedures; and (3) has obtained a valid certification form for each subscriber for whom Odin Wireless seeks Lifeline reimbursement.

In addition, Odin Wireless will provide the results of its annual recertification/verifications to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands) on an annual basis.

Further, as discussed above, Odin Wireless will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.

To the extent required, Odin Wireless will also annually report to the Commission, USAC, and the relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate, the company name, holding company, operating companies and affiliates, and any branding (such as a "dba") as well as relevant universal service identifiers for each entity in the Study Area Code. Odin Wireless will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use/or toll calls. Finally, Odin Wireless will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certifications of compliance with applicable service quality standards and consumer protection rules, as well as a certification that Odin Wireless is able to function in emergency situations.

Odin Wireless submits that its Compliance Plan fully satisfies the requirements set forth in the *Lifeline Modernization Order*. Accordingly, Odin Wireless respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,

PREPAID WIRELESS RETAIL, LLC

By: Robert Felgar

Robert Felgar
General Counsel
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Rockville, Maryland 20852

January 11, 2013

Exhibit 1

cintex wireless

Rhode Island Application

This signed authorization is required in order to enroll you in the Lifeline Program in your state. The information contained in this application may be provided to a government agency or another telephone company to confirm your right to participate in the Lifeline Program.

Things to know about the Lifeline Program:

(1) Lifeline is a federal benefit.
(2) Willfully making false statements to obtain Lifeline benefits can result in fines, imprisonment, de-enrollment or being barred from the program.
(3) Lifeline service is available for only one line per household.
(4) 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.
(5) Households are not permitted to receive benefits from multiple providers.
(6) Violation of the one-per-household limitation violates the law and will result in your de-enrollment from the program.
(7) I understand Lifeline service is a non-transferable service, and that I may not transfer my service to any other individual, including another eligible low-income consumer.

Applicant Information

First Name:_____ MI: _____ Last Name: _____

Social Security Number (last 4 digits): _____ Contact Telephone Number: _____ Date of Birth: _____

Physical Address (*no P.O. Boxes, Must be your prinicpal address*): Is this a temporary address? Yes: _____ No: _____ Email Address: _____

Street Address: _____ APT/Floor: _____ City: _____

State: _____ ZIP Code: _____

*_____ I hereby certify that I participate in at least one of the following programs:
Initial Here

Is this a mutiple household address? ____ Yes _____ No

_____Medicaid (not Medicare)
_____Federal Public Housing Assistance (Section 8)
_____Low-Income Home Energy Assistance Program (LIHEAP)
_____National School Lunch Program (Free Program Only)
_____Temporary Assistance For Needy Families (TANF)
_____Supplemental Security Income (SSI)
_____Aid to Families with Dependent Children (AFDC)
_____General Public Assistance (GPA)
_____Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
_____Rhode Island Pharmaceutical Assistance Program

_____ **OR** _____

_____ I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG). There are_____individuals in my household.
Initial Here

_____ **OR** _____

I live on Tribal Lands and participate in one of the following programs:

_____Bureau of Indian Affairs General Assistance
_____Tribally Administered Temporary Assistance for Needy Families
_____Head Start (only households meeting its income qualifying standard)
_____Food Distribution Program on Indian Reservations

You must provide documented proof of your participation in the above programs or income.

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

*_____ (1) The information contained in my application is true and correct to the best of my knowledge and I acknowlegde that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.

*_____ (2) That I am a current recipient of the above program, or have an annual household income at or below 135 percent of the Federal Poverty Guidelines.

*_____ (3) If I provided documentation proving eligibility, and the name on the documentation is not mine, I certify that that individual is part of my household.

*_____ (4) I attest to the best of my knowledge **that no one in my household is receiving a Lifeline supported service, and that I understand that I can only receive one Lifeline subsidy.**

*_____ (5) I understand that if I do not use my phone in a sixty (60) day period, I may be de-enrolled from the Lifeline program.

*_____ (6) I will notify Cintex Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:
(1) I cease to participate in the above federal or state program, or my annual household income exceeds 135% Federal Poverty Guidelines.
(2) I am receiving more than one Lifeline supported service.
(3) Another member of my household is receiving a Lifeline benefit.

*_____ (7) I will notify Cintex Wireless within thirty (30) days of moving and provide Cintex Wireless my new address.

*_____ (8) I authorize Cintex Wireless to release any records required for the administration of the Cintex Wireless Lifeline program (including my name, telephone 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.

*_____ (9) I understand that I may be required to re-certify my continued eligibilty for Lifeline at any time, and that my failure to re-certify will result in de-enrollement from the Cintex Wireless Lifeline service.

*_____ (10) I understand that if USAC identifies me as receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other. I further understand that some states may impose more stringent rules including, but not limited to, barring me from re-enrolling in the program.

_____ _____
Applicant's Signature Date