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January 17, 2013

VIA ECFS

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

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

Dear Ms. Dortch:

On Wednesday, January 16, 2013, John Nakahata, Lance Steinhart, and Kasey Chow, on behalf of Vast Companies, LLC dba Vast Communications (“Vast Communications” or the “Company”), as well as Stephen Sherman, President of the Company, Wilma Rickey, Vice President of Sales and Marketing of the Company, Regan Williams, Vice President of Accounting and Finance of the Company, and Patrick McDonough, Vice President of Operations of the Company, met with Alexander Minard, Jonathan Lechter, Michelle Schaefer, Garnet Hanley, and David Bradford of the Telecommunications Access Policy Division. We discussed Vast Communications’ Compliance Plan as filed on December 5, 2013.

Patrick McDonough gave an overview of the Company, including details regarding the Company’s goals, intended operations, and financial and technical capability. Wilma Rickey elaborated on the Company’s marketing and outreach plans regarding provision of service to customers on Tribal lands; Mrs. Rickey particularly noted difficulties facing Tribal members, for example that they may not have access to resources that would allow them to physically get to existing wireless Lifeline service providers.

We discussed requested additions and changes to the Company’s compliance plan and certification form. Finally, Vast Communications agreed to file a revised Compliance Plan with all suggested additions and changes.

Ms. Marlene H. Dortch

January 17, 2013

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Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey Chow

Associate at Lance J.M. Steinhart, P.C.

Attorneys for Vast Companies, LLC dba Vast Communications

Attachment

cc: Stephen Sherman
Wilma Rickey
Regan Williams
Patrick McDonough
John Nakahata
Alexander Minard
Jonathan Lechter
Michelle Schaefer
Garnet Hanley
David Bradford



***Vast
Communications***

FCC Company Overview Meeting

January 16, 2013

Agenda

- Introduction to Vast Communications
- Financial and Technical Capability
- Lifeline and Retail Product Offerings
- Marketing/ Advertising Compliance
- End User Enrollment
- Annual Certification
- Procedures Addressing Waste, Fraud, and Abuse
- Questions



Vast Communications

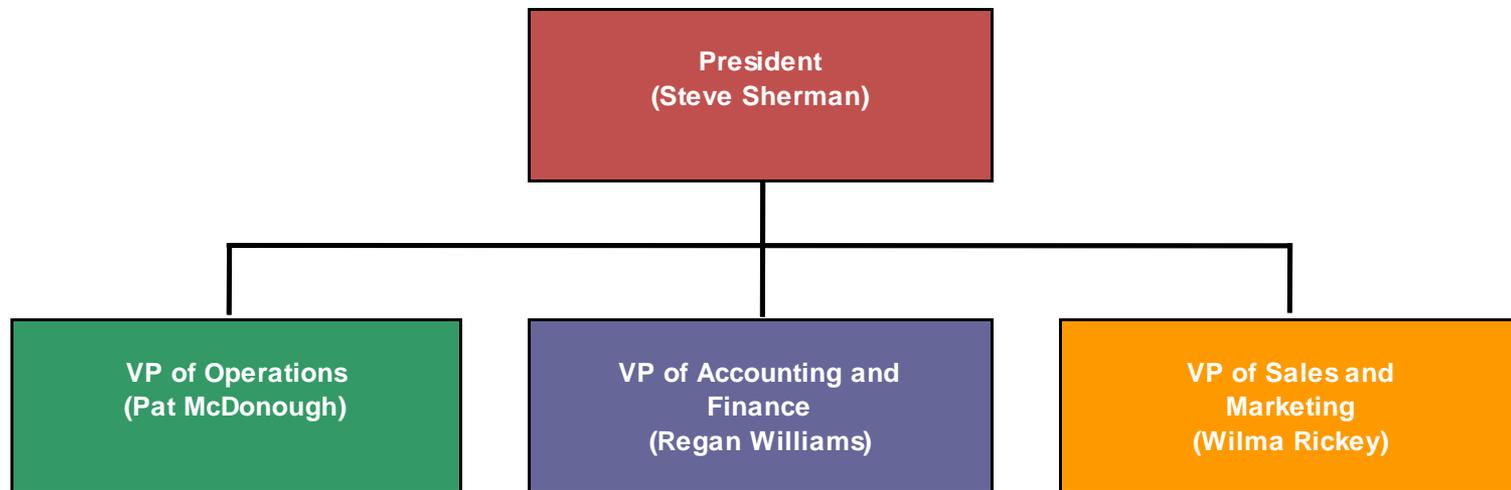
Introduction of Company - Overview

- Vast Communications is a DBA of Vast Companies, LLC
- Starting with a clean slate, Vast Communications was organized in October of 2012
- Web presence: www.vastphone.com



Vast Communications

Introduction of Company – Key Staff



**Functional/
Vendor Responsibility:**

- Carrier/MVNE
- Billing/CRM
- Call Center
- Logistics/Distribution

- Accounting / Financial Reporting
- Bank/Merchant Processing
- Tax/Regulatory Fee Processing
- Payroll Processing

- Bureau of Indian Affairs
- Outreach Partners
- Distribution Partners
- Field Sales
- Design/Printing



Vast Communications

Financial and Technical Capabilities

- Vast Communications has the financial capability to provide the supported Lifeline service:
 - ❖ Initial investment funds to launch service
 - ❖ Both Lifeline and Retail service revenue for sustainability
- Staff with deep expertise in key areas
- Partnering with exceptional wireless and Lifeline service providers



Vast Communications

Product Offering - Overview

- Vast Communications is partnering with a veteran, multi-carrier MVNE
- AT&T or Verizon network coverage is required to provide coverage to our target market
- Offering to cover retail (non-Lifeline), Non-Tribal Lifeline and Tribal Lifeline markets



Vast Communications

Product Offering – Quality & Compliance Commitment

Vast Communications:

- will comply with the service requirements applicable to the support that it receives;
- has the ability to remain functional in emergency situations;
- will satisfy applicable consumer protection and service quality standards (including the 11 point CTIA *Consumer Code for Wireless Service*); and
- is financially and technically capable of providing Lifeline service.



Vast Communications

Product Offering – Rate Plan Packages

Rate Plans	Monthly Fee (if any)		
	Retail	Non-Tribal Lifeline	Tribal Lifeline
Unlimited Voice & Text	\$40.00	\$30.00	\$5.00
Unlimited Voice & Text with 100 MB Data	\$45.00	\$35.00	\$10.00
Unlimited Voice & Text with 500 MB Data	\$50.00	\$40.00	\$15.00

* All rate Lifeline rate plans include: a free phone, free calls to 911, customer care and the IVR (for inquiries), free voice mail, caller ID and call waiting, and free domestic long distance calling.



Vast Communications

Product Offering – Public Safety

Vast Communications:

- will ensure that all handsets used in connection with its Lifeline service are E911- compliant and hearing aid compatible.
- will provide its Lifeline customers with access to 911 and E911 services:
 - ❖ through its underlying carrier(s), AT&T, Verizon (currently in discussions)
 - ❖ irrespective of customer status (active, suspended or deactivated)



Vast Communications

Marketing & Advertising Compliance

Complying with the marketing & disclosure requirements, all Vast Communications' marketing materials will include:

- Disclose company name under which it does business;
- Explain in clear, easily understood language the following:
 - ❖ The service is a Lifeline service, Lifeline is a government benefit program, 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;
 - ❖ Only eligible consumers may enroll in the program and that proper program documentation is required; and
 - ❖ The program is limited to one benefit per household, consisting of either wireline or wireless service and that Lifeline is non-transferrable



Vast Communications

End User Enrollment – Sales Methods

Direct Sales – Electronic: Typically a face-to-face enrollment transaction occurring in retail store or at a sponsored location. All documentation can be witnessed, real-time electronic validation occurs and the customer walks away with phone.

Direct Sales – Paper: Face-to-face enrollment in which enroller does not have access to real-time electronic validation. As such, phone must be shipped to end user after the application and documented proof are validated.

Phone Sales: Real-time, but proof of identity, program eligibility and completed self-certification form must be mailed or faxed and phone is shipped to validated address.



Vast Communications

End User Enrollment - Validation

Company's Enrollment Process requires confirmation of the following 5 items:

1. Confirm Applicant's Identity (via government issued, current picture ID).
2. Confirm program or income eligibility (via database, proof of program participation or proof of annual household income).
3. Confirm valid residential address and whether the address is permanent, temporary or multi-household (validate address via Melissa Data).
4. Confirm applicant is not currently receiving a subsidy from another carrier (specifically mentions other providers in certification). Applicant Certifies under penalty of perjury. Company Perform Duplicate Check into an internal & pooled external database.
5. Confirm applicant receives handset and personally activates or uses the phone prior to seeking reimbursement from Universal Service Fund.



Vast Communications

Annual Recertification

- Vast Communications will annually re-certify all subscribers except for subscribers in states where a state Lifeline administrator or other state agency is responsible for re-certification of subscribers' Lifeline eligibility. The results of the recertification will be sent to USAC.
- Vast Communications will continue to re-certify each lifeline end user annually.
- All customers who fail to respond to recertification attempts within 30 days will be given an written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program.
- Additionally, Vast Communications will follow any state-specific recertification requirements that are applicable.



Vast Communications

Procedures Addressing Waste, Fraud, and Abuse

Vast Communications:

- supports current and future regulations, requirements and policies to prevent, identify and eliminate waste, fraud and abuse.
- will provide customer data to PUCs, FCC, and USAC, as required.
- will adhere to 60-day non-usage requirements
- will prevent, detect and resolve duplicates.
- has volunteered to use a pooled database (CGM, Inc.) to prevent duplicates and will utilize the National Database when available.
- will have an independent audit done when it reaches the required threshold.



***Vast
Communications***

QUESTIONS?