KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400
3050 K STREET, NW
WASHINGTON, D.C. 20007-5108

(202) 342-8400

NEW YORK, NY
LOS ANGELES, CA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

FACSIMILE
(202) 342-8451
www.kelleydrye.com

DIRECT LINE: (202) 342-8544
EMAIL: jheitmann@kelleydrye.com

April 8, 2013

VIA ECFS

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

Re: Head Start Telecom, Inc. Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On June 27, 2012, Head Start Telecom, Inc. ("Head Start Telecom" or "Company") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.[1] Head Start Telecom submitted a revised version of its Compliance Plan on February 15, 2013.

Head Start Telecom has further revised its Compliance Plan to: (a) provide further details regarding the Company's exclusive relationship with its agents in Section I.B.; (b) provide details regarding the Company's customer service contact information and availability (pp. 10-11); (c) provide details regarding Head Start Telecom's ownership and financial capabilities in Section III; and (d) make minor revisions to Head Start Telecom's Lifeline application/certification form (Exhibit B).

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

---

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).

This letter and revised Compliance Plan are 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 Head Start Telecom, Inc.

cc: Jonathan Lechter
Alexander Minard
Michelle Schaefer

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
Head Start Telecom, Inc.	

HEAD START TELECOM, INC. COMPLIANCE PLAN

Head Start Telecom, Inc. dba dartphone ("Head Start Telecom" or the "Company"),[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]

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

[1] The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Head Start Telecom's trade name or d/b/a is dartphone. It has no holding company or communications-related affiliates.

[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).

is submitting this 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]

Head Start Telecom 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 the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows 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 the Company offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

---

[3] *See Lifeline Reform Order*, ¶ 368. Although the Company qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company 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. The Company will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that Head Start Telecom 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.

ACCESS TO 911 AND E911 SERVICES[5]

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (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] The Company complied with these conditions before the effective date of the *Lifeline Reform Order*.

Head Start Telecom will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company 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 Company handsets, even if the account associated with the handset has no minutes remaining.

The Company's existing practices currently provide access to 911 and E911 services for all customers. The Company uses the Sprint and Verizon Wireless networks as its underlying network providers/carriers for its wireless service[7] and AT&T as its underlying carrier for its wireline service. Sprint and Verizon Wireless, and AT&T, route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers. To the extent that Sprint, Verizon Wireless or AT&T is certified in a given PSAP territory, this 911 capability will function the same for the Company. The Company also currently enables 911 emergency calling

---

5 *See* Compliance Plan Public Notice at 3.

6 *See Lifeline Reform Order*, ¶ 373.

7 Head Start Telecom purchases wireless services from several intermediary companies (including Telecom Service Bureau and Telispire), which, in turn, purchase services from Sprint (TSB) and Verizon Wireless (Telispire).

services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. The Company will ensure that all handsets used in connection with the wireless Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. The Company uses phones from various wholesalers, including Telecom Service Bureau, that have been through a stringent certification process with the respective network provider/carrier, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. 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.

COMPLIANCE PLAN

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

A. Policy

The Company complies 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 the Company 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% 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

[8] *See* Compliance Plan Public Notice at 3.

sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company 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

Head Start Telecom enrolls customers through several different marketing channels: 1) in-person, through company owned or affiliated retail outlets; 2) in-person, through field representatives; 3) over the telephone; and 4) through online sales over the Internet. The majority of enrollments are currently completed in-person at events or the Company's retail location, which is a Head Start Telecom affiliated store.

Head Start Telecom's previous grant of forbearance from the requirement that it provide services, at least in part, over its own facilities was conditioned on the Company "dealing directly with the customer to certify and verify the customer's Lifeline eligibility."[9] The origin of this requirement is the TracFone grant of forbearance, which sought to address "concerns about the fact that TracFone distributes its service through retail outlets."[10] The TracFone order granting forbearance rejected the specific point of sale procedures proposed by TracFone that would have allowed it to provide enrollment forms to retailers such as Wal-Mart and RadioShack in various states for Lifeline enrollments.[11] These concerns related to the specific situations at non-TracFone retail outlets (like Wal-Mart and RadioShack), as opposed to Lifeline enrollments

---

9 *Head Start Petition for Forbearance*, WC Docket No. 09-197, CC Docket No. 96-45, Order, FCC 10-134, ¶16 (2010).

10 Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket no. 96-45, Order, FCC 05-165, ¶19 (2005).

11 *See id*. (citing TracFone Wireless, Inc. Notice of Ex Parte Presentation, CC Docket No. 96-45 at 2-3 (filed July 13, 2005)).

conducted by an ETC's agents. Head Start Telecom's previous grant of forbearance included this same condition regarding direct enrollments.

Head Start Telecom complies with the condition because a Head Start Telecom employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement. In addition, Head Start Telecom does not distribute Lifeline application/certification forms to big box or other specialty retail vendors with employees who do not have an agent relationship with Head Start Telecom. Rather, Head Start Telecom enrolls Lifeline customers through the use of employees and exclusive agents that all sign agency agreements and training certifications with Head Start Telecom. All agents that enroll Lifeline customers for Head Start Telecom are exclusive, meaning that, pursuant to their contract with Head Start Telecom, they are not permitted to enroll Lifeline customers for any other ETC in the same state. Specifically, Head Start Telecom's agent agreements state, "We hereby engage You as an Independent Merchant to sell the third party products and services offered through Dartphone. This engagement requires You to exclusively offer Dartphone services. In the event You offer services from a competitor without written approval from Dartphone You will be in breach of this Agreement." Head Start Telecom's affiliated retail store is branded as a Head Start Telecom retailer and acts as an exclusive agent and retailer for Head Start Telecom, and the Company plans to expand its affiliated retail locations under the same agent relationship model. The staff at the retail stores are and will be Head Start Telecom employees or exclusive agents.

The Commission determined in the *Lifeline Reform Order* that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[l]icensees and other Commission regulatees are

responsible for the acts and omissions of their employees and independent contractors.'"[12] Because Head Start Telecom is responsible for the actions of all of its employees and agents, including those enrolling customers in Head Start Telecom affiliated retail locations, and a Head Start Telecom employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, the Company "deals directly" with its customers to certify and verify the customer's Lifeline eligibility.

Regardless of how a customer applies, each customer will provide the same information via Head Start Telecom's standard customer application/certification form discussed further below. The Company operates an electronic enrollment process supported by BeQuick Software, Inc. whereby applicants provide information and make the required certification on a tablet computer. Head Start Telecom checks each customer's government-issued identification or with government benefits administrators for identity verification and address normalization, which is entered into the enrollment application. The address is checked against the USPS database and the customer's information is checked against the Company's own list of existing wireline and wireless customers to ensure it is not a duplicate. If the address is verified and the customer passes the internal duplicate check, they can proceed with the enrollment process whereby the applicant provides the required information, receives the required disclosures and makes the required certifications for enrollment, as discussed further below.

Additionally, Head Start Telecom has adopted a new eligibility certification practice in order to comply with the Commission's new rules designed to protect the integrity of the Low-Income Fund. Once it is available, Head Start Telecom will first check the National Lifeline

---

[12] *Lifeline Reform Order*, ¶ 110.

Accountability Database to determine that the customer's household is not already receiving a Lifeline-supported service. In the meantime, the Company will continue to use (where available) required state eligibility databases. If the Company cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, the Company's employees or agents ("Company personnel") will review documentation establishing eligibility pursuant to the Lifeline rules and as discussed further below.[13]

As discussed in further detail in Section I.F. below, all Company personnel 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 personnel 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.

Customers can also apply for, and obtain, Lifeline services from Head Start Telecom either over the phone or through the Internet. Customers choosing to obtain service through these channels must either fill out an application online, or provide the relevant information to the customer sales representative over the telephone. In these cases, Head Start Telecom will verify eligibility via a state database, state administrator, or by reviewing documentation of eligibility submitted by the applicant in advance of receiving service. The applicant can submit documentation of eligibility via fax, email or regular mail. Head Start Telecom will not ship a phone to a customer until it has successfully verified the customer's proof of eligibility.

---

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

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.[14] Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.[15]

Acceptable documentation of income eligibility includes 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 decree, child support award, or other official document containing income information for at least three months time.[16] If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.[17]

Company personnel 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

---

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

15 *Id*. and section 54.410(c)(1)(i)(B).

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

17 *See id*.

checking the appropriate box on the application form.[18] In addition, Company personnel will fill in, 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. Head Start Telecom will not retain a copy of this documentation, except where state rules require such retention.[19]

Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company 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 Head Start Telecom's corporate headquarters.

<u>De-Enrollment for Ineligibility</u>. If Head Start Telecom has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber 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.[20] 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 certification form. If a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within five business days. Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Customers can call

---

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

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

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

customer service by dialing 611 from their Head Start Telecom handset and no minutes will be used or decremented for the call, or they can call 1-888-360-2030 from any phone. Live customer service operators can currently be reached from 8am to 8pm Monday through Friday, 9am to 6pm on Saturday and 1pm to 5pm on Sunday (all times Central).

C. Subscriber Certifications for Enrollment

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.[21] The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such 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.[22] Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.[23] Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.[24]

---

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

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

23 *See* Income Eligibility Worksheet, included as Exhibit B.

24 *See Lifeline Reform Order*, ¶ 123.

Disclosures. The Company's application and 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.[25]

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.[26]

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.[27]

Information Collection. The Company 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[28]); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different

---

25 *See Lifeline Reform Order*, ¶ 121; section 54.410(d)(1).

26 *See* section 54.405(c).

27 *See Lifeline Reform Order*, ¶ 257.

28 *See id.*, ¶ 87.

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.[29]

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,[30] the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company 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, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, 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 certification form is true and

---

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

30 *See Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

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 the Company to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.[31]

D. Annual Verification Procedures

Head Start Telecom will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed[32] 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.[33] Every Lifeline subscriber should receive (through

---

31 *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*.

32 The Commission has stated that ETCs may rely on electronic signatures, including IVR recordings, that meet the requirements of the E-Sign Act, 44 U.S.C. §§ 7001-7004 (2006). *See Lifeline Reform Order*, ¶¶ 167-169.

33 *See id.*, ¶ 120.

multiple channels) an advance reminder that they must re-certify annually to confirm his or her eligibility in accordance with the applicable requirements. In addition, they will receive an explanation of the many convenient ways that Head Start Telecom offers customers to re-certify. Head Start Telecom allows customers to re-certify via dialing a toll free number (IVR), return text, email, regular mail, and online through Head Start Telecom's website. 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 and if the subscriber fails to respond, he or she will be de-enrolled in the program.[34]

2012 Verification. The Company engaged in a process to re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and reported the results to USAC by January 31, 2013.[35] The Company contacted its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice explained the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

Verification De-Enrollment. Head Start Telecom will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.[36] The Company will send a single written notice explaining that failure to respond to the re-certification request within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the 30 days, the Company will de-enroll the subscriber within five business days.

---

34 *See id.*, ¶ 145.

35 *See id.*, ¶ 130.

36 *See Lifeline Reform Order*, ¶ 142; section 54.405(e)(4).

E. Activation and Non-Usage

Head Start Telecom will not consider a prepaid[37] subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by completing an outbound call. Customers that enroll in person at either a retail store or through a field representative will receive their phone at the time of enrollment, which will be activated after it is issued to the customer and the customer completes an outbound call.

Customers who enroll through other means, such as over the phone or through the Internet, will be mailed a phone upon approval and the customer can personally activate their service by calling 611 customer service. The customer then has to provide identification information to activate the phone. For purposes of "enrollment" in the Lifeline program, Head Start Telecom will use the date of this first completed outbound call as the customer's effective start date.[38]

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.[39] Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct

---

37 By "prepaid" the Company means those customers from whom it does not assess and collect a monthly charge, as described in the *Lifeline Reform Order*, ¶ 257, n.697.

38 *See Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

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

contact from the Company and confirming that the subscriber wants to continue receiving the service.[40]

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[41]

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company 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 database when it becomes available, Company personnel will emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction.[42] All Company personnel interacting with existing and potential Lifeline customers will undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. All Company personnel will be trained upon hire and at least annually. Each employee and agent will sign a statement attesting to their training and understanding of

---

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

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

42 *See id*.

the eligibility requirements. In addition, all Company personnel will be provided with state specific checklists and examples of acceptable documentation of eligibility. The Company maintains an open door policy and encourages employees to ask questions or seek clarification from their supervisor or a member of management. Head Start Telecom has auditing procedures in place to ensure employees are properly trained and following all established procedures.

Furthermore, Head Start Telecom has created a Compliance Department to maintain strict adherence with this Compliance Plan and the *Lifeline Reform Order*. Head Start Telecom operates an in-house call center for customer service. Any complaints of fraud or abuse are taken very seriously and will be promptly investigated by our Compliance Department. Any instances of fraud will result in disciplinary action, up to or including termination and/or prosecution.

Database. When the National Lifeline Accountability Database ("National Database") becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.[43]

One-Per-Household. The Company will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household[44] through the use

---

43 *See Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. *See Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, Company 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).

44 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

of its application and certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, Head Start Telecom will search its own internal records to ensure that it does not already provide Lifeline-supported service, either wireless or wireline, to someone at the same residential address.[45] If so, and the applicant lives at an address with multiple households, the Company 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 consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).[46] Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.[47]

Finally, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of

---

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

45 *See Lifeline Reform Order*, ¶ 78.

46 *Id*. The USAC worksheet is available at http://www.usac.org/li/tools/news/default.aspx#582.

47 *See Lifeline Reform Order*, ¶ 89.

what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. Head Start Telecom 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).

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, the Company 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) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) Head Start Telecom's name (the ETC).[48] These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.[49] This specifically includes the Company's website (www.dartphone.com) and outdoor signage.[50] A sample of the Company's marketing materials is included as Exhibit C. In addition, the Company's application/certification form will state that 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.

---

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

49 *Id*.

50 *Id*.

G. Company Reimbursements From the Fund

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, the Company 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.[51] In addition, the Company will keep accurate records as directed by USAC[52] and as required by new section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;[53] (2) is in compliance with all federal Lifeline certification procedures;[54] and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.[55]

In addition, the Company 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).[56]

---

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

52 *See* section 54.407(e).

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

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

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

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

Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.[57]

The Company 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,[58] the company name, names of the company'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.[59] The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically 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 and/or toll calls.[60] Finally, the Company 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 consumer protection rules, as well as a certification that the Company is able to function in emergency situations.[61]

I. Cooperation with State and Federal Regulators

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

---

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

58 *See* section 54.422(c).

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

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

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

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;[62]

- 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 subscriber whom the Company has a reasonable basis to believe[63] 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[64]

The Company will offer its Lifeline service in the states where it is designated as an ETC[65] and throughout the coverage area of its underlying provider(s). Head Start Telecom currently offers one wireline Lifeline plan and two basic Lifeline wireless service packages that are only available to Oklahoma residents. Once ETC designation has been granted in additional states, Head Start Telecom will offer the Lifeline 250 Plan, which will not be offered in Oklahoma. These plans, which may change due to regulatory or market developments, are listed below.

---

62 The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

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

64 *See* Compliance Plan Public Notice at 3.

65 The Company is designated as an ETC in Oklahoma and will be submitting a petition to the Commission for ETC designation in the federal jurisdiction states. The Company received an ETC designation for its wireline services in Oklahoma on November 13, 2008 (Order No. 562387) and for its wireless services on September 8, 2011 (Order No. 589302).

Oklahoma Lifeline Unlimited Plan

This plan provides Lifeline customers with unlimited anytime prepaid minutes for between $4.58 per month after Lifeline subsidies are applied plus fees and taxes. Text messaging is not available with the unlimited talk plan. There are no rollover minutes with this plan. Unused minutes will expire each month on the service expiration date. This plan is only available to Oklahoma residents.

Oklahoma Lifeline 1000 Plan

This plan provides Lifeline customers with 1000 voice minutes or 2000 text messages for $1.00 per month plus fees and taxes. Text messaging is assessed at a rate of 0.5 minutes per text message for sending and 0.5 minutes per text message for receiving text messages. There are no rollover minutes with this plan. Unused minutes will expire each month on the service expiration date. This plan is only available to Oklahoma residents.

Lifeline Free 250 Plan

This plan will provide Lifeline customers with 250 free voice minutes per month. Text messaging will be assessed at a rate of 1 minute per text message for sending and 1 minute per text message for receiving. There will be no rollover minutes with this plan. Unused minutes will expire each month on the service expiration date. This plan will be available in all states where Head Start Telecom offers Lifeline service except in the tribal areas of Oklahoma.

Lifeline customers can purchase additional bundles of minutes for as low as $0.05/minute. This low per minute rate can be obtained with a purchase of only 200 additional minutes for $10.00. The lowest incremental purchase of minutes is 60 minutes for $5.00. Airtime "top-up" minutes are available for purchase through the Company's toll free number (IVR), at the Company's retail locations and on its website. In the near future, additional

information regarding the Company's plans, rates and services can be found on its website www.dartphone.com.

In addition to voice services, Company's Lifeline plans include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, 3-Way Calling, and Voicemail. All wireless plans include domestic long-distance at no extra per minute charge. Calls to Customer Service (611) or 911 emergency services are always free, regardless of service activation or availability of minutes, and do not count against the customer's minutes. Calls to Directory Assistance (411) are free, however, applicable airtime charges are assessed as minutes of usage.

Wireline Lifeline Plan

The Company currently offers a single wireline Lifeline plan in Oklahoma, which provides basic local service for $1.00 ($31.12 for non-Lifeline eligible customers). Head Start Telecom previously offered two other wireline plans, which are being phased out and are not available to new customers at this time. Domestic long distance can be purchased on a prepaid basis in increments of 100, 200 or 500 minutes. Head Start Telecom does not presently plan to provide wireline service in additional states other than Oklahoma, but rather will focus on the wireless service, but it may reassess in the future.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation[66]

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

[66] *See* Compliance Plan Public Notice at 3.

technical capability to comply with the Commission's Lifeline service requirements.[67] The 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.

Head Start Telecom can demonstrate that it is financially and technically capable of providing both wireless and wireline Lifeline service, because it is already successfully providing both services as a designed Lifeline ETC in the state of Oklahoma. Head Start Telecom is owned by Chad Hoecker and has been providing wireline Lifeline service since 2008 and wireless Lifeline service since September, 2011. The Company is growing its customer base, has no disproportionate consumer complaints, and offers high quality service at affordable rates to all its customers.

Head Start Telecom's business model is to serve low-income customers, who may or may not be eligible to receive Lifeline-supported services. Therefore, Head Start Telecom does not, and does not intend to, offer exclusively Lifeline-supported services – and is therefore not exclusively dependent on the Lifeline program for its revenues. Head Start Telecom has been in service since 2008 and has generated substantial non-Lifeline revenues from selling top-up minutes and accessories, in addition to the financial capabilities of its owner.

Head Start Telecom is a profitable firm, is in good standing with all its vendors so as to ensure its ability to provide customers with safe and reliable service, and has been providing

---

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

telecommunications services to its customers, in compliance with applicable federal and state regulations, since 2008. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."[68] The Company certifies that it will comply with the service requirements applicable to the support the Company receives.[69] The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company 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, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS") to its wireless customers. The Company, 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*

---

68 Compliance Plan Public Notice at 3.

69 47 C.F.R. § 54.202(a)(1).

Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.[70] Head Start Telecom provides TLS to its wireline Lifeline customers at no cost, which allows low-income consumers to avoid unexpected toll charges.[71] The Company's wireline Lifeline offering includes unlimited local calling, but no long distance. All customers can purchase domestic long distance on a prepaid basis. Customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Head Start Telecom's long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service. The long distance vendor charges Head Start Telecom for TLS, and Head Start Telecom seeks reimbursement for TLS from USAC.

IV. Conclusion

The Company 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, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

---

70 *See Lifeline Reform Order*, ¶ 230.

71 *See id*.

Respectfully submitted,

John J. Heitmann
Joshua T. Guyan
Kelley Drye & Warren LLP
3050 K Street, NW
Suite 400
Washington, D.C. 20007
(202) 342-8544

Counsel to Head Start Telecom, Inc. dba dartphone

April 8, 2013

EXHIBIT A

Head Start Telecom, Inc. dba dartphone
Oklahoma Wireless Lifeline Service Application and Certification

Mail or fax form completed and signed form to:
PO Box 2504
Stillwater, OK 74076
Fax 405-533-5290/ Customer Service: 1-888-360-2030

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Head Start Telecom, Inc. dba dartphone's ("the Company's") Lifeline service program in your state. This Certification is for the purpose of verifying your eligibility for Lifeline service. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service 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 discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

□ **I hereby certify under penalty of perjury that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.**

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs **(check one)**:

- ❑ Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
- ❑ Section 8 Federal Public Housing Assistance (FPHA)
- ❑ SoonerCare/Medicaid (not Medicare)
- ❑ Supplemental Security Income (SSI)
- ❑ Temporary Assistance for Needy Families (TANF)
- ❑ Low Income Home Energy Assistance Program (LIHEAP)
- ❑ National School Lunch Program's free lunch program
- ❑ Income at or below 135% of Federal Poverty Guidelines
- ❑ Food Distribution Program on Indian Reservations (FDPIR)
- ❑ Bureau of Indian Affairs General Assistance (BIA)
- ❑ Tribally Administered TANF (TATNF)
- ❑ Head Start (meeting income qualifying standards) (Tribal)
- ❑ Oklahoma Sales Tax Relief

Tribal eligibility:
□ I hereby certify that I reside on Federally-recognized Tribal lands.

Customer Application Information:
First Name:_____ Middle Name: _____ Last Name: _____
Date of Birth: Month: ___ Day: ___ Year: _____ Last Four Digits of Social Security Number (or Tribal ID Number): _____
If Qualifying for Lifeline by Income, number of Individuals in Household: _____
Home Telephone Number (if available): _____

Residential Address (P.O. Box NOT sufficient)
Number: _____ Apt: _____ Street_____ City _____
State: _____ Zip Code: _____
Address is (choose one): □ Permanent □ Temporary

Billing Address (if different from Residential Address) (P.O. Box IS sufficient)
Number: _____ Apt: _____ Street_____ City _____
State: _____ Zip Code: _____

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

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling customer service. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing

an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

□ **I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.**

Authorizations:

□ I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (name, telephone number, address, date of birth, last four digits of SSN, amount of support being sought, means of qualification for support, and dates of service initiation and termination), 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.

Additional certifications: I hereby certify, under penalty of perjury, that (check each box):

□ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required

□ I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement

□ I am head of my household and not listed as a dependent on another person's tax return (unless over the age of 60)

□ The address listed below is my primary residence, not a second home or business

□ If I move to a new address, I will provide that new address to the Company within 30 days

□ If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days

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

□ I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits

□ The information contained in this certification form is true and correct to the best of my knowledge

Applicant's Signature: _____ **Date:** _____

For Agent Use Only **(check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):**

Documents Acceptable Proof for Income-Eligibility (check 1):

☐ 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 decree, child support award, or other official document.

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

☐ Supplemental Nutrition Assistance Program (SNAP)
☐ Medicaid
☐ Section 8 Federal Public Housing Assistance (FPHA)
☐ Supplemental Security Income (SSI)
☐ Temporary Assistance for Needy Families (TANF)
☐ Low Income Home Energy Assistance Program (LIHEAP)
☐ National School Lunch Program's free lunch program
☐ Food Distribution Program on Indian Reservations (FDPIR)
☐ Bureau of Indian Affairs General Assistance (BIA)
☐ Tribally Administered TANF (TATNF)
☐ Head Start (meeting income qualifying standards)
☐ Oklahoma Sales Tax Relief

List B - Choose 1:

☐ Program participation card/document
☐ Prior year's statement of benefits
☐ Notice letter of participation
☐ Other official document evidencing participation

_____

Last 4 digits of Document from List B_____

Date of Proof Document: _____/_____/_____

Expiration Date of Proof Document: _____/_____/_____

Applicant Account Number	Agent/Dealer Number

EXHIBIT B

dartphone 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 income 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	$15,512
2	$20,939
3	$26,366
4	$31,793
5	$37,220
6	$42,647
7	$48,074
8	$53,501
For each additional person	Add $5,427

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

If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months.

This is a Lifeline service provided by Head Start Telecom, Inc. 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 wireline. 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 C

- Free Wireless Phone
- Free Voicemail
- Free Long Distance
- Free Call Waiting
- Free Caller ID

No Deposit!
No Contract!
No Credit Check!

Do you participate in food stamps, Medicaid or another government assistance program?

THEN YOU MAY QUALIFY FOR DISCOUNTED WIRELESS PHONE SERVICE THROUGH LIFELINE, A GOVERNMENT ASSISTANCE PROGRAM.

Apply online at www.dartphone.com or call 888.360.2030

Lifeline is a government assistance program. Only eligible customers may participate in the Lifeline program and participation is limited to one benefit per household consisting of either wireline or wireless service. Documented proof of participation in a government assisted program or income qualification is required for enrollment. Lifeline service is non-transferrable. Consumers who willfully make a false statement in order to obtain Lifeline benefits can be punished by fine or imprisonment or can be barred from the program.

dartphone

dartphone

YOU HAVE THE RIGHT TO REMAIN CONNECTED.

FREE WIRELESS PHONE

AND

1000 FREE minutes every month*
OR unlimited packages available

*Wireless coverage and availability not guaranteed. Service not available in all areas. Free wireless devices require activation at the time of receiving equipment. Deferred installation fees may apply. Wireless refills expire 30 days after activation. Other terms, conditions & restrictions apply. Service provided by Head Start Telecom, Inc. For complete wireless terms and conditions, please visit www.dartphone.com