



Suite 800
1919 Pennsylvania Avenue NW
Washington, D.C. 20006-3401

Danielle Frappier
202.973.4242 tel.
daniellefrappier@dwt.com

VIA ECFS

November 19, 2013

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

Re: Ex Parte Communication in WC Dockets 11-42, 09-197, and 03-109

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, the undersigned counsel hereby provides notice that on November 15, 2013, Stanley McCright, CEO of Executone of Chattanooga, LLC, d/b/a Concentric Network Solutions, LLC ("Concentric"), Deborah Taylor-Tate, Adam Shoemaker, and I of Davis Wright Tremaine, had four separate meetings with (1) Commissioner Rosenworcel and Christianna Barnhart, Legal Advisor to Commissioner Rosenworcel; (2) Nicolas Degani, Legal Advisor, Wireline in Commissioner Pai's office; (3) Trent Harkrader, Kimberly Scardino, Jonathan Lechter, and Chris Cook of the Wireline Competition Bureau; and (4) Commissioner Clyburn and Rebecca Goodheart, Legal Advisor, Wireline in Commissioner Clyburn's office. During our conversations we discussed Concentric's pending Lifeline Compliance Plan and its proposal to become a Lifeline Eligible Telecommunications Carrier. A copy of the public version of Concentric's plan is attached hereto for convenience. We also discussed the role that Mr. McCright, through an affiliated company, has played as an agent for the local agencies that work with the Department of Housing and Urban Development ("HUD") to determine the eligibility of citizens for government-supported housing programs. Concentric provided the attached slides to provide background information on Mr. McCright's experience working with low income participants in HUD housing. Mr. McCright and Deborah Taylor Tate also met Commissioner Michael O'Rielly and Daniel Alvarez, Advisor to the Chairman and discussed the same.

Please contact me should you have any questions.

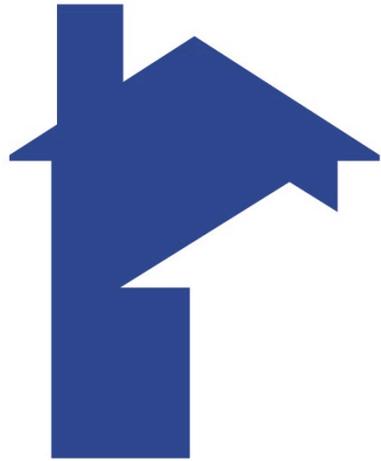
Respectfully submitted,

/s/ Danielle Frappier

Danielle Frappier
*Counsel to Concentric
Network Solutions, LLC*

Cc: Commissioner Clyburn
Commissioner Rosenworcel
Commissioner O'Rielly
Rebecca Goodheart
Daniel Alvarez
Christianna Barnhart
Nicolas Degani
Trent Harkrader
Kim Scardino
Jonathan Lechter
Chris Cook

Attachment 1



McCright
& Associates

**The Nation's Leader in Public
Housing Authority Support**

Who we are:

- ◆ McCright & Associates for more than 25 years has been the trusted partner of choice for public housing authorities who demand product and service excellence.
- ◆ Conducted over 1,500,000 inspections across the nation.
- ◆ Focus on compliance, customer care and cost-efficiency.

McCright data solutions:

- ◆ More than a decade of service
- ◆ Ease of use, able to verify results
- ◆ Adaptable to delivery devices: handhelds, computers, smart phones
- ◆ 6th generation product that is road tested and data stable

Created system in 1999 to readily confirm public housing eligibility and to annually re-certify

Back To Schedules

| General Inspection Information | | | |
|---|--------------------------|---|---|
| Tenant Name ELAINE MORROW | | Event ID C86HLK | |
| Property Address 123 Somewhere St Unit # 0 | | Housing Authority Housing Authority of Cook County | |
| City Country Club Hills | State IL | Zip 60478 | Phone Number <small>(Please enter a 10 digit number. No dashes or spaces)</small> 5554496345 |
| Scheduled Start Time 08:00 | End Time 05:00 | Inspection Type Initial/RFTA | |
| General Property Information | | | |
| Structure Type Single Family | Other: Specify | SQ Footage 1100 | |
| # of Bedrooms 2 | # of Sleeping Rooms 3 | # of Bathrooms 1.5 | # of Residents 2 |
| TN Monthly Rent 400 | Additional Fees 0 | Fee Description | |

Save

Designed for HUD verification:

- ◆ System set up in 1999, 6th generation product, road tested, data stability
- ◆ Recertify eligibility annually
- ◆ Standardized form on handheld device
- ◆ Easy to modify fields

- ◆ Via satellite, verification of time and date inspection
- ◆ Extract database of information, bring into system, enter facility-specific variables using specific event I.D.
- ◆ Secure information using an event I.D.
- ◆ Electronic signature to verify documents

Data updates ensure consistency:

- ◆ 30,000 times a month, McCright puts data into and out of the system real time
- ◆ Every 30 minutes updates are running for the system
- ◆ Able to collect data based on questions for future planning

Schedule page:

Tells inspector where to go, when, and provides contact information for the necessary parties.

This page refreshes automatically every 30 seconds.
 You have 0 completed inspections waiting to be uploaded.
 Your local time: 2013-11-04 11:56:07 EST

Click on Tenant's Address to open an Inspection

| TN Name Phone | TN Addr #bed LBP | LL Name Phone | Insp Type | Sched Time | Comments | Census | Rtd Seq | Followup |
|-------------------------------|---|------------------------------------|---------------------------------|--|---|--------|---------|---|
| ELAINE MORROW 5554496345 | 123 Somewhere St 0 Country Club Hills IL 60478 (BR=) (LBP=N0) 1972 | MR & MRS LANDLORD 5554627819 | Initial/RFTA C86HLK IL025 | November 04, 2013 08:00:00-05:00:00 | Please call LL 30 minutes prior to inspection | | 4 1 | 'Fail--call for followup Inc-call for followup ' |
| MAURICE JOHNSON 5556984167 | 12445 Somewhere St 0 Anywhere US 12345 (BR=) (LBP=N0) 1950 | EQUITY OWNERS 5556345988 | Annual CT3UWW IL025 | November 04, 2013 08:00:00-05:00:00 | | | 4 2 | 'Fail-2013-11-25 Inc-notify by mail ' |
| WILLIAM KATNER 5553158157 | 13 Somewhere St Apt 1B Anywhere US 12345 (BR=) (LBP=N0) 1900 | PROPERTY MANAGEMENT 5556781469 | Annual C5ELDF MA003 | November 04, 2013 08:00:00-05:00:00 | | | 4 3 | 'Fail--call for followup Inc-call for followup ' |
| ANNA STASIA 5557189534 | 6487 Somewhere St Apt 2 Anywhere US 12345 (BR=) (LBP=Und) | REAL ESTATE PARTNERS 5553343303 | Annual CQW8RN MA020 | November 04, 2013 08:00:00-05:00:00 | | | 4 4 | 'Fail-2013-11-11 Inc-2013-11-11 ' |
| SABRINA SMITH 5559712456 | 4201 Somewhere St 0 Anywhere US 12345 (BR=) (LBP=N0) 1965 | SOMEWHERE APTS 5556241567 | Annual CQJZQ TN003 | November 04, 2013 08:00:00-05:00:00 | | | 4 5 | 'Fail-2013-12-04 Inc-notify by mail ' |
| ANNA WILLIAMS 5556417787 | 2647 Somewhere St Apt C Anywhere US 12345 (BR=) (LBP=Und) | ANYWHERE COMPLEX 5553315447 | QA CPGC6Z MA012 | November 04, 2013 08:00:00-05:00:00 | Sandy Haas | | 4 6 | 'Fail-2013-12-09 Inc-call for followup ' |

Amenity information:

00129142000171n3p2y1cm1orderAmenities.php?prop=Search&VehID=C00160&UnitID=077000

Specify Other Amenities

[Back To Schedules](#) [Go To My Rooms](#) [Back To Property Info](#) [Save](#)

Property Amenities

Appliances Supplied By Owner:

| | | | | |
|--|---|------------------------------------|---------------------------------|--------------------------------|
| <input checked="" type="checkbox"/> Refrigerator | <input checked="" type="checkbox"/> Stove | <input type="checkbox"/> Microwave | <input type="checkbox"/> Washer | <input type="checkbox"/> Dryer |
|--|---|------------------------------------|---------------------------------|--------------------------------|

Does Owner Make Repairs When Asked? Yes No

Predominant Flooring:

| | | | |
|---|-------------------------------|--------------------------------|-----------------------------|
| <input checked="" type="radio"/> Carpet | <input type="radio"/> Ceramic | <input type="radio"/> Hardwood | <input type="radio"/> Vinyl |
|---|-------------------------------|--------------------------------|-----------------------------|

In-Unit Laundry: Yes No

| | | | |
|--|---|---|-----------------------------|
| <input type="radio"/> Washer Hookup Only | <input type="radio"/> Dryer Hookup only | <input type="radio"/> Washer and Dryer Hookup | <input type="radio"/> Clear |
|--|---|---|-----------------------------|

Common Laundry Room (not in unit):

Common Laundry Room

Parking:

| | | | |
|------------------------------|-------------------------------|---|---|
| <input type="radio"/> Garage | <input type="radio"/> Carport | <input checked="" type="radio"/> Off Street Parking | <input type="radio"/> On Street Parking |
|------------------------------|-------------------------------|---|---|

Disability Features:

| | | | |
|---|---|----------------------------------|---|
| <input type="checkbox"/> Smoke Detector w/Strobe | <input type="checkbox"/> Flasing Doorbell | <input type="checkbox"/> Braille | <input type="checkbox"/> Hearing Impaired (Visual Aids) |
| <input checked="" type="checkbox"/> Wheelchair Accessible | <input type="checkbox"/> Wheel Chair Lift | | |

Other:

| | | |
|-----------------------------------|--|---------------------------------------|
| <input type="checkbox"/> Elevator | <input type="checkbox"/> Security System | Tenant Comments: <input type="text"/> |
|-----------------------------------|--|---------------------------------------|

Data Capture Screen:

Gives general property information.

[Back To Schedules](#)

| General Inspection Information | | | | Save |
|---|--------------------------|---|---|------|
| Tenant Name ELAINE MORROW | | Event ID C86HLK | | |
| Property Address 123 Somewhere St Unit # 0 | | Housing Authority Housing Authority of Cook County | | |
| City Country Club Hills | State IL | Zip 60478 | Phone Number <small>(Please enter a 10 digit number. No dashes or spaces)</small> 5554496345 | |
| Scheduled Start Time 08:00 | End Time 05:00 | Inspection Type Initial/RFTA | | |
| General Property Information | | | | |
| Structure Type Single Family | Other: Specify | SQ Footage 1100 | | |
| # of Bedrooms 2 | # of Sleeping Rooms 3 | # of Bathrooms 1.5 | # of Residents 2 | |
| TN Monthly Rent 400 | Additional Fees 0 | Fee Description | | |
| Lead Based Paint Information | | | | |
| Year Built 1972 | | Children Under 6 <small>(Please Complete if the house was built before 1978)</small> 0 | | |
| EIBLL Children | | | | |
| Property is the primary residence for Children who qualify as EIBLL | | No | If Yes, number of EIBLL Children? | |

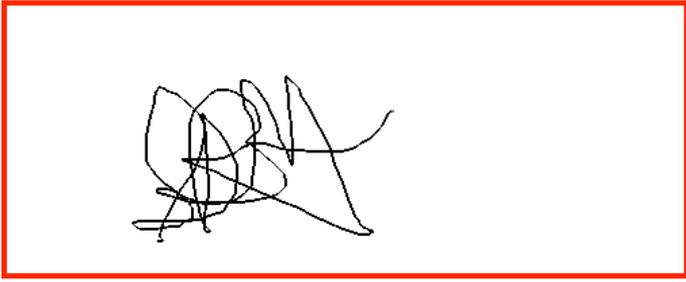
[Save](#)

Signature capabilities:

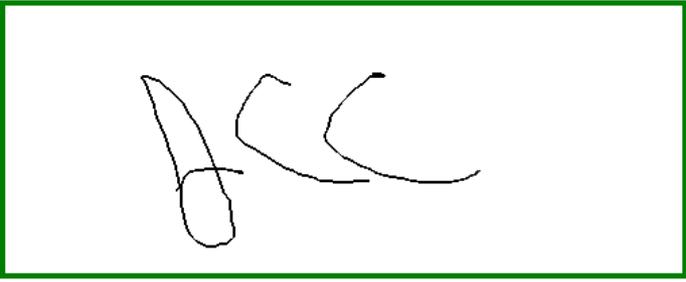
Enter your comments here...

Comments specific to unit inspection

Inspector, please sign in red box



LL/TN, please sign in green box



The system is adaptable to multiple programs and devices:

| Item # | 9. HQS Addendum | Decision | Comment |
|--------|--|---|---------------------------------------|
| | | Pass All <input type="button" value="v"/> | |
| 9.1 | Screen on windows - at least one per room, except for central air or rooms with air conditioners | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.2 | Fire extinguisher in apts. | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.3 | Written verification from qualified electrical or mechanical peronnel if problems are found or suspected | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.4 | Door on bedroom entrances | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.5 | Lock on bathroom door | Fail <input type="button" value="v"/> | lock removed |
| 9.6 | Ample closet space | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.7 | Reasonable clean appliances | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.8 | Painting required if walls are heavily marred or soiled | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.9 | Dumpster: One per building for each building containing over four apartments and if refuse disposal facilities are determined inadequate | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.10 | Heat must maintain 70 degrees during cold weather | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.11 | Storm doors must be in good condition with closer, handle, glass, and/or screen | Fail <input type="button" value="v"/> | glass broken |
| 9.12 | Storm windows cannot be used as primary windows and must have at least a screen and glass or two of either one | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.13 | No bars on at least one window per room; if bar are present remove one | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.14 | Minimum bedroom size - 70 square feet (7 x 10) | Pass <input type="button" value="v"/> | <input type="text"/> |
| | | | <input type="button" value="Finish"/> |

Transfers to other services:

- ◆ Program updates could be displayed on the phone
- ◆ Recertification of phones using current database
- ◆ Information fields adaptable to events and agencies
- ◆ Ability to:
 - ❖ qualify, recertify and de-enroll
 - ❖ build state specific information
 - ❖ create data reports for federal, state agencies

Customer Specific Survey Forms:

UNIT ANALYSIS

Unit Address: 123 Somewhere St.0, Country Club Hills, 60478 Owner/Agent: MR & MRS LANDLOED
 Phone #: 5554627819 Date: 11/04/2013

Utilities and Services Paid
 (Note if Gas, Electric, Oil, or Other):

Electricity: T F Cooking Fuel: T Gas Heat: T Electric Hot Water: T Gas
 Trash Collection: T F Water and Sewer: T F Stove: T F Refrigerator: T F

| Estimated Square Footage: | | | | | Approximate Date Built or Completely Renovated: | |
|--|-----------|-----------|-----------|------------|---|---|
| | 0-1 BR | 2 BR | 3 BR | 4 BR | | |
| <input type="radio"/> Small | Up to 500 | Up to 700 | Up to 900 | Up to 1100 | <input checked="" type="radio"/> Built Before 1978 | <input type="radio"/> 1978 to 5 years ago |
| <input type="radio"/> Average | 501-700 | 701-900 | 901-1100 | 1101-1300 | <input type="radio"/> Under 5 years ago OR completely renovated | |
| <input checked="" type="radio"/> Large | 701+ | 901+ | 1101+ | 1301+ | | |

Bedrooms: # Baths: Total Square Footage: Quality of Unit:

Parking Facilities:

Garage Carport Off Street On Street

Amenities:

Washer Provided by LL Dryer Provided by LL In Complex Other:

Premium Amenities:

Pool Playground Clubhouse Weight Room
 Other:

On-Site Manager/Maintenance Accessible Walk to Public Transportation (Within a Mile) Walk to Schools

Special Feature of Unit:

Final Rating of Unit:

Newly Constructed or Completely Renovated Well Maintained or Partially Renovated Average, But Some Repairs May Be Needed Soon

Section 8 HCV Worksheet:

Section 8 HCV Unit Quality Rating & Rent Reasonableness Worksheet

Unit Address: Unit Type: # Bedrooms: Date:
 Owner/Manager: Address: Phone #:
 Census Tract: Total Unit Quality & Value Rating:
 Actual Square Footage: Initial Annual

| Location, Structure, & Basic Features | | | | |
|--|--|--|--|---|
| Square Footage <small>(rated by type & condition)</small> <input type="text" value="751-1200 sq. ft."/> | Location by Zip Code <small>(rated by type & condition)</small> <input type="text" value="East"/> | Date Built/Remodeled <small>(rated by remodeled date if applicable)</small> <input type="text" value="1960-1969"/> | Unit Type: <input type="text" value="House"/> | Structure Foundation <small>(rated by type & condition)</small> <input type="text" value="Brick/block"/> |
| Structure Shell <small>(rated by type & condition)</small> <input type="text" value="Wood Siding"/> | Roof <small>(rated by condition)</small> <input type="text" value="Fair"/> | Guttering & Downspouts <small>(rated by condition)</small> <input type="text" value="Good"/> | Private Patio/Deck/Balcony <small>(rated by condition)</small> <input type="text" value="No Patio/Deck/Balcony"/> | Parking <small>(rated by type & condition)</small> <input type="text" value="Carport"/> |
| Heating & Air Conditioning Equipment <input type="checkbox"/> Ceiling Heat <input type="checkbox"/> BaseBoard/Wall Heat <input checked="" type="checkbox"/> Central <input checked="" type="checkbox"/> Window AC/HVAC <input type="checkbox"/> Programmable Thermostat | | Appliances <small>(rated by condition & type)</small> <input type="radio"/> Refrigerator (manual defrost) <input checked="" type="radio"/> Refrigerator (frost free only) <input type="radio"/> Refrigerator (Energy Star or Equivalent) <input type="radio"/> Refrigerator not provided <input checked="" type="checkbox"/> Range | | |

Section 8 HCV Worksheet:

| Item # | 9. HQS Addendum | Decision | Comment |
|--------|--|---|---------------------------------------|
| | | Pass All <input type="button" value="v"/> | |
| 9.1 | Screen on windows - at least one per room, except for central air or rooms with air conditioners | Pass <input type="button" value="v"/> | <input type="text"/> |
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| 9.4 | Door on bedroom entrances | Pass <input type="button" value="v"/> | <input type="text"/> |
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| 9.11 | Storm doors must be in good condition with closer, handle, glass, and/or screen | Fail <input type="button" value="v"/> | glass broken |
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| 9.13 | No bars on at least one window per room; if bar are present remove one | Pass <input type="button" value="v"/> | <input type="text"/> |
| 9.14 | Minimum bedroom size - 70 square feet (7 x 10) | Pass <input type="button" value="v"/> | <input type="text"/> |
| | | | <input type="button" value="Finish"/> |

Adaptive solutions:

- ◆ Using our winning formula that has been refined over more than 25 years, able to apply our unique, successful identification re-certification process to other government programs.
- ◆ Transfer re-certification expertise to Lifeline program.
- ◆ Use our stakeholder organizations in every community and apply our initial and re-certification success to assure 1 Lifeline phone per household.
- ◆ Clear, distinct verification of Lifeline phone subscribers.

Making a difference:

- ◆ A winning formula, refined over 25 years of service.
- ◆ 100% HUD certification for a family to enroll; 100% HUD re-certification.
- ◆ Improve the 30-40% Lifeline phone compliance using the proven 100% HUD performance record.
- ◆ Connect subscribers to the community services more efficiently and more effectively.

Contact us:

McCright & Associates
928 McCallie Ave.
Chattanooga, TN 37403
www.McCright.com

Stan McCright
Chief Operating Officer
mccright@mccright.com

423-468-1620 Office
423-265-6222 Fax
423-280-5133 Cell

Appendix: QA questionnaire

Inspector Ratings/Safety

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Inspector Customer Service Ratings [Save](#)

| | |
|---|--|
| Promptness: (Was The Inspector on Time?) <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input checked="" type="radio"/> 5 | Professionalism: (Was The Inspector Professional, Thorough and Knowledgeable?) <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input checked="" type="radio"/> 5 |
| Courtesy: (Was The Inspector Courteous and Polite?) <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input checked="" type="radio"/> 5 | Appearance: (Was The Inspector Properly Dressed and Groomed?) <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input checked="" type="radio"/> 5 |
| Responsiveness: (Did the Inspector explain the process and answer any questions?) <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input checked="" type="radio"/> 4 <input type="radio"/> 5 | Overall Impression: (What was the overall impression of the Inspector and Inspection?) <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input checked="" type="radio"/> 5 |

Rating / Safety

| | |
|---|---|
| Electricity In Service: <input checked="" type="radio"/> Yes <input type="radio"/> No | Pays Electric: <input checked="" type="radio"/> Tenant <input type="radio"/> Owner <input type="radio"/> Clear |
| Water In Service: <input checked="" type="radio"/> Yes <input type="radio"/> No | Pays Water: <input type="radio"/> Tenant <input checked="" type="radio"/> Owner <input type="radio"/> Clear |
| Gas In Service: <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A | Pays Gas: <input checked="" type="radio"/> Tenant <input type="radio"/> Owner <input type="radio"/> Clear |
| Working Smoke Detector on Every Floor? <input checked="" type="radio"/> Yes <input type="radio"/> No | CMOX Sensors Installed?(Gas Utility Homes Only) <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A |

Appendix: Certificate of Occupancy

Form displays based on specific criteria such as inspection type, city name, zip code, and inspection type .

Certificate of Occupancy Requirement

Valid Until: EACH NEW TENANT

Valid For Current Resident Only?

Allow Bed in Basement?

Bed in Basement Notes:

Codes Used:

Contact:

Phone:

Notes:

CO found in eMIMS warehouse?

Inspector, have you seen a Certificate of Occupancy that meets the above requirements?

Yes No N/A

Appendix: Ratings and safety

| Rating/Safety | | | |
|--|--|---|--|
| <u>Unit HQS Rating:</u> | | | |
| <input type="radio"/> Excellent (Greatly Exceeds Min. HQS) | <input checked="" type="radio"/> Sound (Somewhat Exceeds Min. HQS) | <input type="radio"/> Average (Barely Meets Min. HQS) | <input type="radio"/> Poor |
| <u>Neighborhood Rating:</u> | | | |
| <input type="radio"/> Excellent (HQ Neighborhood) | <input type="radio"/> Above Average (Residential) | <input checked="" type="radio"/> Average (Mixed Commercial) | <input type="radio"/> Below Average (Industrial) |
| <u>Working Smoke Detector on Every Floor?</u> | | | |
| <input checked="" type="radio"/> Yes | <input type="radio"/> No | | |
| <u>CMOX Sensors Installed?(Gas Utility Homes Only)</u> | | | |
| <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> N/A | |
| <input type="button" value="Save"/> | | | |

Appendix: Utility information

| | | | | |
|---|---|---|-----------------------------|-----------------------------|
| Property Utilities & Responsibilities | | | | |
| <u>Heating System:</u> | | | | |
| <input checked="" type="radio"/> Central / Building Wide | <input type="radio"/> Baseboard | <input type="radio"/> Window | <input type="radio"/> Wall | <input type="radio"/> Other |
| <u>Air Conditioning:</u> | | | | |
| <input type="radio"/> Central | <input checked="" type="radio"/> Owner's Window / Wall Unit(s) | <input type="radio"/> Tenant's Window Unit(s) | <input type="radio"/> Clear | |
| <u>Heating Fuel:</u> | | | | |
| <input checked="" type="radio"/> Electric | <input type="radio"/> Natural Gas | <input type="radio"/> LP Gas | <input type="radio"/> Oil | <input type="radio"/> Other |
| <u>Cooking Fuel:</u> | | | | |
| <input type="radio"/> Electric | <input checked="" type="radio"/> Natural Gas | <input type="radio"/> LP Gas | <input type="radio"/> Other | |
| <u>Water Heating Fuel:</u> | | | | |
| <input type="radio"/> Electric | <input checked="" type="radio"/> Natural Gas | <input type="radio"/> LP Gas | <input type="radio"/> Other | |
| <u>Electricity In Service:</u> | | <u>Pays Electric:</u> | | |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | <input checked="" type="radio"/> Tenant <input type="radio"/> Owner <input type="radio"/> Clear | | | |
| <u>Water In Service:</u> | | <u>Pays Water:</u> | | |
| <input checked="" type="radio"/> Yes <input type="radio"/> No | <input type="radio"/> Tenant <input checked="" type="radio"/> Owner <input type="radio"/> Clear | | | |
| <u>Gas In Service:</u> | | <u>Pays Gas:</u> | | |
| <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A | <input checked="" type="radio"/> Tenant <input type="radio"/> Owner <input type="radio"/> Clear | | | |
| <u>Sewer Type:</u> | | <u>Pays Sewer:</u> | | |
| <input type="radio"/> City <input checked="" type="radio"/> Septic <input type="radio"/> Well Water | <input type="radio"/> Tenant <input checked="" type="radio"/> Owner <input type="radio"/> Clear | | | |
| <u>Who Pays Trash:</u> | | <u># Water Meters:</u> | <u># Electric Meters:</u> | |
| <input checked="" type="radio"/> Tenant <input type="radio"/> Owner <input type="radio"/> Clear | 1 | 1 | | |

Appendix: Example HCV unit information

| HCV Unit Information Cambridge Housing Authority | | | |
|--|--|---|--|
| Requested Rent: 400.00 | Building Type: Single Family/Detached | Condition Rating (Exterior) Average | Condition Rating (Interior) Average |
| # of Units in the Bldg: 1 | Construction Type: Siding | Private Outdoor Space: Private Patio | |
| Check all that Apply: | | | |
| <input checked="" type="checkbox"/> Cable Ready <input type="checkbox"/> Furnished <input checked="" type="checkbox"/> Ceiling Fan <input type="checkbox"/> Fireplace <input type="checkbox"/> Lawn Maintenance Service <input type="checkbox"/> Gated Community <input type="checkbox"/> Elevator <input type="checkbox"/> Playground <input type="checkbox"/> Gym/RecRoom in Bldg <input type="checkbox"/> Pool/Spa in Bldg <input checked="" type="checkbox"/> Building Security System <input type="checkbox"/> Commercial on 1st Floor | | | |
| Comments: | | | |
| Additional unit analysis comments here. | | | |
| <input type="button" value="Submit"/> | | | |

Appendix: Disposition of inspection

Inspection Summary

<< Schedules
<< Start Page
<< My Rooms

Number of Fail Routine Deficiencies: 6
Number of Fail Emergency Deficiencies: 0
Number of Pass With Comment Deficiencies: 0

Physical Reinspection will be required.

| Floor/Room/Location | Deficiency Detail | Comments | Severity | Responsible |
|--------------------------------|------------------------|---------------------------|--------------|-------------|
| 1 / Living Room / Center Front | Int Wall Plg Pnt Major | all walls | Fail Routine | Owner |
| 1 / Living Room / Center Front | Int Lead Assess | | Fail Routine | Owner |
| Site/Ext | Ext Wall Plg Pnt Major | | Fail Routine | Owner |
| Site/Ext | Ext Lead Assess | | Fail Routine | Owner |
| Bldg Systems | No Access | no access to water heater | Fail Routine | Owner |
| Site/Ext | CO Permit Rqd | | Fail Routine | Owner |

Fail Routine

Attachment 2

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Received & Inspected

AUG 19 2013

FCC Mail Room

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

August 16, 2013

VIA OVERNIGHT DELIVERY

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

Re: Executone of Chattanooga, L.L.C. d/b/a Concentric Network Solutions, L.L.C.
d/b/a HUDconnect's Compliance Plan
WC Docket No. 09-197 & WC Docket No. 11-42

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission Order *In the Matter of Lifeline and Link Up Reform and Modernization* released February 6, 2012, attached please find an original and four (4) copies of Executone of Chattanooga, L.L.C. d/b/a Concentric Network Solutions, L.L.C. d/b/a HUDconnect's ("Concentric" or the "Company") Compliance Plan. A redacted version is being filed electronically.

Confidential treatment is requested for data provided in Exhibits C and E, pursuant to Section 0.459 of the Commission's rules.¹ The confidential material is clearly marked and is being filed in a separate envelope. The marked information is sensitive company information not available to the public, including competitively sensitive information about the Company's financials.

As required by Section 0.459(b) of the Commission's rules, Concentric provides the following information regarding its request for confidential treatment:

1. Confidential treatment is requested for Concentric's sensitive enrollment information as well as financial information.
2. Sensitive enrollment information is contained in Exhibit C of the enclosed Compliance Plan, and Financial information is contained in Exhibit E of the enclosed Compliance Plan.
3. The information regarding Concentric's sensitive enrollment processes and financials is commercially and financially sensitive and is privileged. The information is not generally publicly available.

¹ 47 C.F.R. § 0.459.

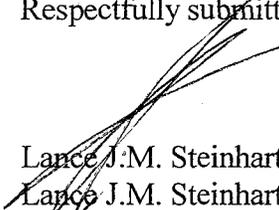
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4. The wireless telecommunications industry is highly competitive.² There is competition in the provision of wireless Lifeline service from standard wireless ETCs and the special Lifeline ETCs that have already been designated.
5. The release of this information will cause substantial competitive harm to Concentric. Disclosure would give competitors access to privileged information that may affect the actions of those competitors. Competitors could utilize such information to extrapolate sensitive data regarding Concentric's future operations and financial condition.
6. Concentric considers this information to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
7. This information is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel.
8. The information should not be released for public inspection, as it contains proprietary company information that is competitively and financially sensitive. At some point, however, this information will become stale. At minimum, the information should be protected for not less than three years.

For the foregoing reasons, Concentric respectfully requests that the Commission provide confidential treatment for the identified information.

I have enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,


Lance J.M. Steinhart

Lance J.M. Steinhart, P.C.

Attorneys for Executone of Chattanooga, L.L.C. d/b/a
Concentric Network Solutions, L.L.C. d/b/a HUDconnect

Enclosures

cc: Norman Klugman

² See generally *Thirteenth Annual CMRS Competition Report*, 24 FCC Rcd 6185 (2009).

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

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| In the Matter of the |) | |
| |) | |
| Telecommunications Carriers Eligible for |) | WC Docket No. 09-197 |
| Universal Service Support |) | |
| |) | WC Docket No. 11-42 |
| Lifeline and Link Up Reform and Modernization |) | |
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| Executone of Chattanooga, L.L.C. d/b/a Concentric |) | |
| Network Solutions, L.L.C. d/b/a HUDconnect |) | |
| Compliance Plan |) | |

**EXECUTONE OF CHATTANOOGA, L.L.C. D/B/A CONCENTRIC NETWORK
SOLUTIONS, L.L.C. D/B/A HUDCONNECT'S COMPLIANCE PLAN**

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for Executone of Chattanooga,
L.L.C. d/b/a Concentric Network Solutions,
L.L.C. d/b/a HUDconnect*

August 16, 2013

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| Compliance Plan |) | |

**EXECUTONE OF CHATTANOOGA, L.L.C. D/B/A CONCENTRIC NETWORK
SOLUTIONS, L.L.C. D/B/A HUDCONNECT'S COMPLIANCE PLAN**

I. INTRODUCTION

Executone of Chattanooga, L.L.C. d/b/a Concentric Network Solutions, L.L.C. d/b/a HUDconnect (“Concentric” or the “Company”) is a prepaid wireless telecommunications carrier seeking designation as an Eligible Telecommunications Carrier (“ETC”) solely for the purpose of participating in the Lifeline program. Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission (“FCC” or “Commission”) has forbore from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.¹ Concentric will avail itself of the FCC’s conditional grant of forbearance and, by its attorney, hereby files its Compliance Plan outlining the measures it will take

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*, 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 (rel. Feb. 6, 2012) (“*Order*”).

to implement the conditions of forbearance outlined in the *Order*.² Given the severe economic environment that is forcing many low-income customers to forego wireless service, Concentric respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

II. BACKGROUND

In the *Order*, the Commission granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:³

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) 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; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier’s various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

III. CONCENTRIC WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER

Concentric will comply with all conditions set forth in the *Order*, the provision of this

² 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), the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state, particularly 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.

³ See *Order* at ¶¶ 368, 373 and 379.

Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.⁴

A. Access to 911 and E911 Services

In the *Order*, the Commission requires Concentric to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.⁵ The Commission and consumers are hereby assured that all Concentric 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 Concentric handsets even if the account associated with the handset has no minutes remaining.

B. E911-Compliant Handsets

The Commission also conditioned its grant of forbearance determination on Concentric providing only E911-compliant handsets to its Lifeline customers.⁶ Concentric will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing Concentric customer does not have an E911-compliant handset, the Company will replace it with a 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well.

C. Consumer Eligibility and Enrollment

Concentric will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility,

⁴ To the extent that future changes in federal regulations render the commitments herein invalid, the Company reserves the right to modify its operations in accordance with federal regulations in effect at that time.

⁵ See *Order* at ¶ 373.

⁶ See *id.*

Concentric will rely on the state identification or database.⁷ In instances where Concentric is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

1. One-Per-Household

Concentric understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as “any individual or group of individuals who are living together at the same address as one economic unit.”⁸ Upon receiving an application for Lifeline support, Concentric will check the National Lifeline Accountability Database (“NLAD”), once in place, to determine whether an individual at the applicant’s residential address is currently receiving Lifeline-supported service. Concentric will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If Concentric determines that an individual at the applicant’s address is currently receiving Lifeline-supported service, Concentric will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, Concentric will require applicants to complete and submit to the Company USAC’s one-per-household template.⁹ Concentric will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

On its certification forms, a draft sample of which is attached,¹⁰ Concentric will obtain a consumer’s permanent residential address (which cannot be a P.O. Box or General Delivery

⁷ See Order at ¶ 98.

⁸ See Order at ¶ 74.

⁹ See Order at ¶ 78.

¹⁰ See Exhibit A. The draft form remains subject to change, but substantially reflects the content of the Company’s application.

address), unless they only have a temporary address, and a billing address for the service, if different (which may include a P.O Box or General Delivery address).¹¹ Concentric will inquire on its certification forms whether or not the applicant's address is a temporary one.¹² If and when the 90-day verification rules become effective, Concentric will notify the consumer that if they have a temporary address, the Company will contact the consumer every 90 days, by phone or text, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of Concentric's attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program.¹³ Also on its certification forms, Concentric will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.¹⁴ If the subscriber has moved, Concentric will update the NLAD, once in place, with the information within 10 business days of receipt of the information.¹⁵

As detailed below, Concentric's certification form will clearly explain the one-per-household requirement and all consumers must certify that they receive Lifeline support for a single subscription per household.

2. Initial and Annual Certification

Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company website, which will provide information regarding the Company's Lifeline service plans, including a detailed description of the program and eligibility criteria. Concentric's application form will identify that it is a "Lifeline" application. Concentric's initial and annual certification forms will conform to the list of

¹¹ See Order at ¶ 85.

¹² See Order at ¶ 89.

¹³ See *id.* As of the date of filing of this Compliance Plan, this requirement has not been approved pursuant to the Paperwork Reduction Act.

¹⁴ See Order at ¶ 85.

¹⁵ See *id.*

requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. Concentric's Lifeline certification forms, a draft sample of which is attached as Exhibit A, will require each prospective subscriber to provide the following information:

- (i) The subscriber's full name;
- (ii) The subscriber's full residential address;
- (iii) Whether the subscriber's residential address is permanent or temporary;
- (iv) The subscriber's billing address, if different from the subscriber's residential address;
- (v) The subscriber's date of birth;
- (vi) The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
- (vii) If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
- (viii) If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in § 54.409, the number of individuals in his or her household.

The certification forms will also explain in clear, easily understandable language that:

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) 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;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

Concentric will require all consumers, at sign up and annually thereafter, to certify under penalty of perjury that:

- (i) The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;
- (ii) The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
- (iii) If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal

- lands, he or she lives on Tribal lands, as defined in 54.400(e);
- (iv) If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
 - (v) If the subscriber provided a temporary residential address, he or she will be required to verify his or her temporary residential address every 90 days;
 - (vi) The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
 - (vii) The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
 - (viii) The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
 - (ix) The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements. Consumers who do not complete the application process in person must return the signed application and proof of eligibility to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.¹⁶

Concentric will determine eligibility utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a),(b)), as well as any additional state-specific criteria. Prior to enrolling a new subscriber, Concentric will check the eligibility of low-income consumers first by accessing electronic databases containing information regarding enrollment in qualifying assistance programs ("eligibility database"), where available.¹⁷ If a database is used to establish eligibility, Concentric will not require documentation of the consumer's participation in a qualifying federal program; instead, Concentric or its representative will note in its records

¹⁶ See Order at ¶ 168.

¹⁷ See Order at ¶ 97.

what specific data was relied upon to confirm the consumer's initial eligibility for Lifeline.¹⁸ However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for Concentric to check electronic databases for eligibility, Concentric will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.¹⁹ Concentric will require acceptable documentation both for income eligibility and for program eligibility. Any evidentiary documentation submitted is used strictly to verify a consumer's eligibility to participate in the Lifeline program. After review and documentation of how the consumer demonstrated his or her eligibility, such proof of eligibility is destroyed and is not retained by the Company.²⁰ Concentric understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Concentric remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.²¹

Concentric will provide Lifeline-specific training to all employees, agents or representatives ("personnel") that interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services. Company personnel will be trained to answer questions about Lifeline eligibility and program requirements, and to review customer documentation to determine whether it satisfies eligibility requirements. The training will explain what forms of documentation are acceptable for proof of program or income eligibility in accordance with 47 C.F.R. 54.410. Among other things, the Lifeline program training will discuss the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training will explain what sections of the

¹⁸ See Order at ¶ 98.

¹⁹ See Order at ¶ 99.

²⁰ See Order at ¶ 101.

²¹ See Order at ¶ 110.

form must be completed by the customer and review the form disclosures in detail, to facilitate the ability of personnel to explain each item contained therein and answer any customer questions. Because the Company is responsible for the actions of all its personnel and a Company 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 always “deals directly” with its customers to certify and verify customers’ Lifeline eligibility.

3. Enrollment Methods

In person. Concentric will enroll eligible low-income residents directly, in person, using Company representatives (“Stakeholders”) in each community.²² It is anticipated that 90% of all qualified recipients will be enrolled using this method. Each Stakeholder will be equipped with a wireless pad to enter application information, perform an immediate online search for duplicates, and verify eligibility in real-time prior to obtaining the customer’s signature.

When a prospective customer applies in person, the Stakeholder will ask to see a government issued ID in order to verify the applicant’s identity. Before moving forward with the application process, the Stakeholder will review the one-per-household rule and confirm with the prospective customer that, to the best of their knowledge, neither they nor any of their household members currently receive a Lifeline benefit. Using the information entered on the prospective customer’s application form, the electronic application software will perform the following waste, fraud, and abuse prevention measures immediately, and in real-time: (1) validate the address via a USPS/Melissa Database; (2) query the Company’s own internal database to ensure the applicant’s household is not already receiving a subsidy from the Company; (3) query the NLAD, once it is available, to ensure the applicant’s household is not already receiving a subsidy from any other

²² See attached Exhibit C for additional CONFIDENTIAL information regarding stakeholders and enrollment processes. Stakeholders will not represent any other Lifeline service provider.

service provider; and (4) query an available state or federal eligibility database to determine eligibility. Where eligibility databases are not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. The Stakeholder will verbally review all certifications and disclosures with the applicant before they sign the application form, making sure the applicant verbally acknowledges each required certification before moving on to the next. If the customer indicates on the application form that their address is a multi-household residence, the Stakeholder will require the applicant to complete USAC's one-per-household template as well. Concentric's Lifeline application contains an "Office Use Only" section where Stakeholders must record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID), and sign attesting that they have reviewed sufficient documentation. Eligibility documents are returned to the customer after review. Upon successful completion of the certification process, eligible customers are given their free phone in person and educated on the Company's non-usage policy. Customers will be instructed to call Concentric customer service, where they will be required to verify their identity, in order to activate their phone and initiate their Lifeline service.

Online. Concentric anticipates that the remaining approximate 10% of enrollment will be online.²³ When enrolling via the Internet, prospective customers will be able to fill out an electronic application form on the Company's website and sign electronically. Concentric will highlight the certifications that are required, for example, by requiring consumers to

²³ Concentric will accept phone inquiries where employees can educate prospective customers on the Lifeline program, but Concentric will then facilitate an in-person application appointment with a Stakeholder in the prospective customer's community, when possible, or direct them to complete the application process online.

acknowledge each certification before moving on to the next field.²⁴ If the customer indicates that their address is a multi-household residence, online interface will require the applicant to complete USAC's one-per-household template as well. Using the information entered on the prospective customer's application form, the electronic application software will perform the following waste, fraud, and abuse prevention measures immediately, and in real-time: (1) validate the address via a USPS/Melissa Database; (2) query the Company's own internal database to ensure the applicant's household is not already receiving a subsidy from the Company; (3) query the NLAD, once it is available, to ensure the applicant's household is not already receiving a subsidy from any other service provider; and (4) query an available state or federal eligibility database to determine eligibility. Where eligibility databases are not available, the online interface will advise the applicant that they are required to provide proof of identity and verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company (they will be able to upload copies immediately) as well as what documentation qualifies as proof of benefits. The application will be placed in a "hold" status until the Company receives copies of the applicant's proof documentation, at which point a Company employee will review the documentation and complete the "Office Use Only" section of the application form to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID), and sign attesting that they have reviewed sufficient documentation. Concentric will destroy copies of proof documentation and deliver phones to eligible customers by mail via traceable delivery. Customers will be instructed to call Concentric customer service, where they will be required to verify their identity, in order to activate their phone and initiate their Lifeline service.

²⁴ See *Order* at ¶ 123.

4. Annual Re-Certification

Concentric understands that it must annually re-certify the eligibility of its entire Lifeline subscriber base and report the results to USAC by January 31, and the Company may elect to perform this re-certification on a rolling basis throughout the year.²⁵ By December 31 of each year, Concentric will re-certify the continued eligibility of all of its subscribers. Where an eligibility database is available, Concentric (or state agency or third-party, where applicable) will query the eligibility database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the database, Concentric will contact the subscriber every year during the annual certification process to obtain a valid address.²⁶

Alternatively, when an eligibility database is not available, Concentric will re-certify the continued eligibility of its subscribers by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.²⁷ The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. Concentric will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Concentric understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.²⁸

²⁵ See Order at ¶ 130.

²⁶ See Order at ¶ 131.

²⁷ See *id.*

²⁸ See Order at ¶ 132.

Concentric will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for reimbursement. As part of Concentric's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

(1) that the Company has procedures in place to review consumers' documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on an eligibility database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state, and

(2) that the Company is in compliance with all federal Lifeline certification procedures.²⁹

D. Other Reforms to Eliminate Waste, Fraud and Abuse

Concentric shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Company customers from engaging in such abuse of the program, inadvertently or intentionally. Concentric has implemented enrollment procedures designed to prevent subsidies for duplicate, ineligible, or inactive subscribers. The Company internally edits all subsidy request data to prevent duplicate subsidies (i.e. any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month) and subsidies for inactive lines under the Company's non-usage policy. Through the processes described herein, Concentric ensures that it does not over-request from support funds.

As detailed in section III.C.2, Concentric first validates each applicant's identity via a

²⁹ See Order at ¶ 126-27.

government issued ID card, passport, etc. Additionally, as mentioned above, Concentric requires the applicant to provide their date of birth (DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor a Company representative can forge certification forms based on false names and addresses. Concentric validates the applicant's address via a USPS/Melissa Database to ensure the address is correct. Concentric verifies that the applicant is eligible to receive the Lifeline subsidy by checking an available eligibility database, or, if one is not available, by requiring the applicant to provide proof of eligibility. Concentric details the one-per-household rule with the applicant and requires the applicant to certify that they and their household do not currently receive a Lifeline benefit. Concentric checks against its internal database to ensure the applicant is not already receiving a subsidy from the Company, and will also check the NLAD, once it is available. These processes prevent ineligible applicants or duplicate subscribers from receiving the subsidy.

1. National Lifeline Accountability Database

Concentric will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Concentric will provide to the NLAD subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.³⁰ Concentric will provide the information listed above for existing subscribers within 60 days of Commission notice that the NLAD is capable of accepting subscriber information.³¹

Furthermore, on its certification form, Concentric will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the

³⁰ See *Order* at ¶ 189.

³¹ See *Order* at ¶ 190.

subscriber's name, telephone number, and address will be divulged to USAC (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.³²

Within 30 days following Commission notice that the NLAD is capable of accepting queries, Concentric will query the NLAD to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from the Fund.³³

2. Subscriber Usage

Concentric will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, Concentric will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.³⁴ Concentric will notify its subscribers at service initiation, via the certification form and via script that is reviewed with every customer, about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.³⁵ An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to

³² See Order, Appendix C.

³³ See Order at ¶ 203.

³⁴ See Order at ¶ 257.

³⁵ See *id.*

continue.³⁶ Concentric utilizes tracking software to notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. Furthermore, the Company internally validates its subsidy data to prevent a subsidy request for customers that are inactive under the Company's non-usage policy. After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the procedures outlined in section E below. Concentric will continue to comply with applicable public safety, including transmitting 911 calls to the appropriate PSAP even if the Company is no longer providing Lifeline service to a consumer.³⁷

3. Marketing & Outreach

Concentric will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Concentric will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:³⁸ (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. Concentric's website³⁹ and printed collateral will explain the documentation necessary for enrollment, and the details of

³⁶ See Order at ¶ 261.

³⁷ See Order at ¶ 262. 911 transmission will actually be performed by the Company's underlying facilities-based CMRS provider.

³⁸ See Exhibit B for a sample advertisement. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. See Order at ¶ 275.

³⁹ www.concentricnetworksolutions.net. See Exhibit D for screen shots of the Lifeline sections of Concentric's website which are currently under development.

Concentric's rate plans. Such collateral and website information, as well as its application, will make clear 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.⁴⁰ For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Concentric will include the URL link for its website where disclosures will be listed. Additionally, Concentric will disclose the company name under which it does business.⁴¹

4. Audits

The *Order* requires ETCs that draw \$5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, to hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess the ETC's overall compliance with the program's requirements.⁴² Concentric will comply with this requirement if and when it is approved, including applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.⁴³

E. De-Enrollment

If at any time a Concentric Lifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-enrollment requests. Concentric Lifeline customers simply call the Company, via 611 or the toll-free customer service number, and they can speak to a live operator to de-enroll from

⁴⁰ See *Order* at ¶ 275.

⁴¹ See *id.*

⁴² See *Order* at ¶ 291.

⁴³ See *Order* at ¶ 294. As of the date of filing of this Compliance Plan, the audit requirement has not been approved pursuant to the Paperwork Reduction Act.

Concentric's Lifeline program. Concentric will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

Ineligibility. Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).⁴⁴

If a customer does not respond to the Company's annual verification survey within 30 days, or if Concentric has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Concentric will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.⁴⁵ Similarly, Concentric will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.⁴⁶

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,⁴⁷ Concentric will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. Concentric will de-enroll any subscriber that has not used the Company's Lifeline service for 60 consecutive days, as discussed in section IV.B above. Concentric will provide the subscriber 30 days' notice, using clear, easily understood language, that the

⁴⁴ See Order at ¶ 122.

⁴⁵ See *id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

⁴⁶ See Order at ¶ 89.

⁴⁷ See Order at ¶ 214-16.

subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be initiated after 30-days of non-usage. Concentric will update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

F. Additional Rule Amendments

1. Terms and Conditions of Service

Concentric's Lifeline offering is summarized in section IV.C below. The Company's terms and conditions are subject to change as needed and will be maintained at www.concentricnetworksolutions.net.

2. Reporting Requirements

Concentric will report all information required by section 54.422, including as it may heretofore be amended. This includes the names of the Company's holding company, operating companies and affiliates, and any branding ("doing-business-as company" or brand designation), and provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline plans for voice telephony service offered specifically for low income consumers through the program offered 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.⁴⁹

3. Reimbursement from USAC

In seeking reimbursement for Lifeline, Concentric will comply with the requirements of

⁴⁸ See Order at ¶ 257.

⁴⁹ See Order at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person."

C.F.R. § 54.407, as revised by the *Order*.⁵⁰ Concentric will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,⁵¹ and the Company will seek reimbursement for actual lines served, not projected lines.⁵²

4. Section 54.202 Certifications

Concentric certifies the following in accordance with newly amended C.F.R. § 54.202: (1) Concentric will comply with the service requirements applicable to the support that it receives; (2) Concentric is able to remain functional in emergency situations; (3) Concentric will satisfy applicable consumer protection and service quality standards.

IV. COMPANY INFORMATION

Concentric is a Tennessee limited liability company. Concentric will provide prepaid wireless telecommunications services to consumers by using the networks of its underlying carrier(s), Sprint PCS and Verizon Wireless (“Sprint/Verizon”). Sprint and Verizon are nationwide carriers that provide wholesale capacity on their wireless networks to resellers like Concentric. Concentric has a contract with Zefcom, LLC d/b/a Telispire PCS (“Telispire”), a Mobile Virtual Network Enabler (“MVNE”), to purchase minutes for re-sale. Through its contract with Telispire, Concentric obtains from Sprint/Verizon the network infrastructure and transmission facilities to allow Concentric to operate as a Mobile Virtual Network Operator (“MVNO”).

A. Operations

Concentric does not have any holding companies or operating companies; see Exhibit E for information on Concentric’s affiliates. Concentric will provide Lifeline service under its d/b/a, HUDconnect. Concentric intends to use Expert Telecom Compliance, Inc. for ETC reporting

⁵⁰ See *Order* page 221.

⁵¹ See *Order* at ¶ 128.

⁵² See *Order* at ¶ 302.

compliance, and will use Telispire for call rating and customer usage services in addition to network access.

B. Financial and Technical Capability

Concentric is financially and technically capable of providing Lifeline-supported services.⁵³ Concentric is an existing, self-supporting business that provides business analysis and technology solutions for businesses, including data storage and network services such as co-location and hosting. Concentric is therefore financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. Concentric intends to offer wireless services to both Lifeline and non-Lifeline customers. In the event that USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. Concentric has not been subject to enforcement action or ETC revocation proceedings in any state. Furthermore, the senior management of Concentric has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.⁵⁴ Concentric will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

C. Customer Service

Concentric is dedicated to quality customer service and care. Lifeline customers can reach the Company by contacting the Stakeholder in their community, or by contacting the Company's Customer Service department via phone, mail, e-mail, or fax. Concentric's Customer Service department is available Monday through Friday 8:30am – 5:30pm EST. The Company has a dedicated in-house Customer Service staff that will handle all service requests, including elective de-enrollments as outlined in Section III.E above.

⁵³ See *Order* at ¶ 387. See financial information in CONFIDENTIAL Exhibit E.

⁵⁴ See Exhibit F for key management bios.

D. Lifeline Offering

Concentric will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, currently Sprint.⁵⁵ Concentric has not yet applied for ETC designation with any state PUCs, but intends to petition with the FCC for ETC designation in Alabama, Connecticut, Delaware, District of Columbia, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, Texas and Virginia. As summarized in Exhibit G attached hereto, Concentric's Lifeline offering will provide customers with a 250 minute anytime talk and text plan, with text messaging at a rate of 1 SMS text per voice minute.⁵⁶

In addition to wholly-supported voice services, Concentric's Lifeline plan will include a free handset and access to Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and Voicemail features at no charge. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes and texts, also referred to as "top ups." Top-ups are currently available in the following bundles: 400 minutes for \$15.00, 500 text messages for \$6.00, and 1000 text messages for \$11.00. Top-ups will be available for purchase at retail distribution partners or from Concentric by phone or online.

E. What Makes Concentric Unique

Concentric is set apart from all other Lifeline companies by the blend of its members' background and experience and Concentric's unique market strategy. The members operating the Company bring a combined 55 years of experience working in the assisted public housing environment and the telecom industry (see Exhibits E, F). This unique blend brings clarity and

⁵⁵ The Company reserves the right to alter the proposed Lifeline rate plans on a state-by-state basis, particularly as required by state public utility commissions (PUC). The Company commits to pass through the entire Lifeline subsidy amount directly to the consumer.

⁵⁶ The Company may alter its Lifeline offering as necessary on a state-by-state basis, particularly as required by state public utility commissions.

understanding to the Lifeline marketplace – in relation to customers’ needs as well as the information needed to ensure program integrity.

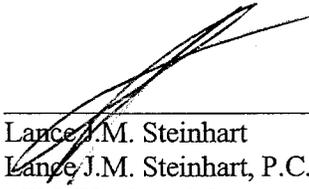
The unique marketing strategy to be employed by Concentric will be to engage “Stakeholders” who are familiar with and have a presence within the communities to which Concentric will market. These Stakeholders will have an existing relationship with the communities and be familiar with the residents, and thus have the ability to approach each resident face to face and will be trained to give a clear and concise explanation of the Lifeline program. Because of the personal, ongoing relationship Concentric will have with its Lifeline customers through its Stakeholders, Concentric anticipates it will have a high customer retention rate and receive quality customer referrals. Through Concentric’s personal, relational approach to marketing combined with its thorough enrollment processes and the effective waste, fraud and abuse prevention mechanisms that the Commission has already put in place, Concentric is confident that it will be able to extend Lifeline benefits to qualified recipients for whom the program was intended, while effectively avoiding misuse of the program.

V. CONCLUSION

Concentric submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, Concentric respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Executive of Chattanooga, L.L.C. d/b/a
Concentric Network Solutions, L.L.C. d/b/a
HUDconnect



Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005
(770) 232-9200

Its Counsel

Dated August 16, 2013

Exhibit A

Sample Lifeline Certification Form

HUDconnect LIFELINE APPLICATION

A Complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you the Lifeline program in your state. The Certification is only for the purpose of verifying your eligibility in the Lifeline service and will not be used for any other purpose other than administration of the program. This service is provided by Concentric Network Solutions, L.L.C. d/b/a HUDconnect. Requests will not be processed until this form has been received, verified and processed by the company.

Things to know about the Lifeline Program:

- (1) Lifeline is a government benefit program.
- (2) Lifeline Service is available for only one line, wireless OR wireline, per household. A household cannot receive benefits from multiple providers; and
- (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.

Applicant Information:

First Name: _____ MI: _____ Last Name: _____ Date of Birth: Month ___ Day ___ Year _____

Social Security Number or Tribal ID Number (last 4 digits): _____ Contact Telephone Number: _____

Residence Address (No P.O. Boxes, Must be your principal address): This address is Permanent Temporary Multi-Household

_____ APT/ Floor/ Other _____ City: _____ State: _____ ZIP Code: _____

Billing Address (May Contain and P.O. Box)

_____ APT/ Floor/ Other _____ City: _____ State: _____ ZIP Code: _____

Initial Here I hereby certify that I participate in at least one of the following programs: (Check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Tribally Administered TANF (TATNF) |
| <input type="checkbox"/> Federal Public Housing Assistance | <input type="checkbox"/> Head Start (Tribal households meeting income qualifying standards) |
| <input type="checkbox"/> Low- Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Food Distribution Program (program on Indian reservations) |
| <input type="checkbox"/> National School Lunch Program | |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | |
| <input type="checkbox"/> Medicaid | |

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

I certify, under penalty of perjury: *(Please certify by checking each Checkbox for each Certification)*

- (1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge 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) I am a current recipient of the program checked above, or have an annual household income at or below 135 percent of the Federal Poverty Guidelines.
- (3) I have provided documentation of eligibility if required to do so.
- (4) I understand that I and my household can only have one Lifeline-supported telephone service. HUDconnect has explained the one-per household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the lifeline program, and could result in criminal prosecution by the United States Government.
- (5) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline supported service from any other land line or wireless company such as Safelink, Assurance, or Reachout Wireless.
- (6) I understand my Lifeline service is a non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- (7) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period which I may use the service or contact HUDconnect to confirm that I want to continue receiving their service.
- (8) I will notify HUDconnect 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 I or my household:
 - (1) cease to participate in the above federal or state program, or my annual household income exceeds 135% FPG.
 - (2) are receiving more than one Lifeline supported service;
 - (3) no longer satisfy the criteria for receiving Lifeline support.
- (9) I will notify HUDconnect within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with HUDconnect every ninety (90) days. If I fail to respond to HUDconnect's address verification attempts within thirty (30) days, my Lifeline service may be terminated.
- (10) HUDconnect has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my HUDconnect Lifeline service.
- (11) I authorize and understand that HUDconnect may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program all the information related to my account including but not limited to my name, date of birth, social security, usage history, address and phone number.
- (12) I understand that my name, telephone number, address, date of birth, last four digits of my Social Security Number or my Tribal ID Number, the date my Lifeline service was initiated, the date my Lifeline service was terminated, if applicable, amount of Lifeline support requested on my behalf and the means through which I qualified for Lifeline will be divulged to the Universal Service Administrative Company (USAC)(the administrator of the program) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy.
- (13) I understand that if USAC identifies I am 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.
- (14) I authorize the company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program.
- (15) I certify that I reside on Federally Recognized Tribal lands (if applicable)

APPLICANT'S SIGNATURE

DATE

HUDconnect LIFELINE APPLICATION

Agent Use Only:

1. Eligibility determination (check only 1 eligibility category and only 1 box under that category; do not copy or retain documentation):

Documents Acceptable Proof Income-Eligibility (if proof does not cover a full year, it must cover 3 consecutive months, same document type, within previous 12-months):

- 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.

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)

Documents Acceptable Proof for Program-Eligibility: List A (Continued)

- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards)

List B - Choose 1

- Program Participation card / document
- Prior year's statement of benefits
- Notice letter of participation
- Other official qualifying document: _____

| | |
|------------------------------|---------------------------------|
| Representative Number | Representative Signature |
|------------------------------|---------------------------------|

Exhibit B

Sample Advertisement



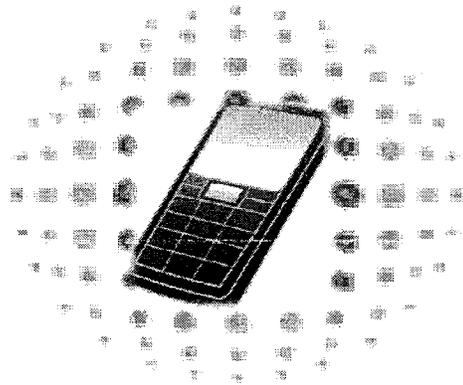
HUDconnect

Now offering Lifeline cell service in your area!

**You may qualify for HUDconnect's Lifeline*
Service if you participate in programs such as
Federal Public Housing Assistance or Medicaid**

**250 FREE MINUTES
every month**

*No contracts.
No Credit Checks.*



*See www.concentricnetworksolutions.net/HUDconnect for details. Lifeline is a government benefit program. Only eligible consumers may enroll. Proof of eligibility is required. Lifeline Service is available for only one phone line per household, consisting of either wireline or wireless service. A household cannot receive benefits from multiple providers. Lifeline service is non-transferable.

For more information, call

800-xxx-xxxx

Or visit us online

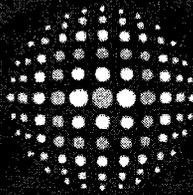
www.concentricnetworksolutions.net/HUDconnect

Exhibit C

CONFIDENTIAL Enrollment Information

Exhibit D

Website Screen Shots



concentric NETWORK SOLUTIONS

Site Search

your complete technology partner

Services

Solutions

HUDConnect

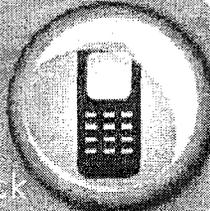
About Us

Contact

HUDConnect provides Lifeline service, a government benefit program supported by the federal Universal Service Fund. Enrollment is available to participants who qualify based on federal or state specific eligibility criteria.

The Lifeline Assistance program is available for one wireless or home phone line account per household. 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. Click [HERE](#) to see if you qualify.

FREE Phone
FREE Minutes
NO Contract
NO Credit Check





voice

Reduce your telecommunication costs.
With over 25 years of experience, Concentric Network Solutions has saved our clients millions of dollars. The majority of our clients save more than 20% on their monthly telecom expenses.
[read more...](#)



data

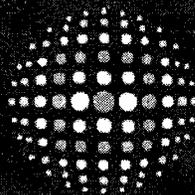
Access to your data, when you need it.
Your ability to access your data is crucial to your company's success. We have solutions for all of your data intensive needs, whether it is storage, recovery, redundancy, or porting to the Cloud.
[read more...](#)



network

Access our high availability data center.
With our access to high-speed, redundant power networks, we can provide connectivity to your mission-critical business applications, and ensure they are online and available at all times.
[read more...](#)

Your south-east leader in data communications



concentric
NETWORK SOLUTIONS

Site Search

your complete technology partner

Services

Solutions

HUDConnect

About Us

Contact

Sign Up Now

Add Minutes

Recertify

Questions

HUDConnect

Since 1985, the Lifeline program has provided a discount on phone service for qualifying low-income consumers to ensure that all Americans have the opportunities and security that phone service brings, including being able to connect to jobs, family and emergency services. In 2005, Lifeline discounts were made available to qualifying low-income consumers on pre-paid wireless service plans in addition to traditional landline service. Lifeline is part of the Universal Service Fund.

The Lifeline program is available to eligible low-income consumers in every state, territory, commonwealth, and on Tribal lands. Consumers with proper proof of eligibility may be qualified to enroll. To participate in the program, consumers must either have an income that is at or below 135% of the federal Poverty Guidelines or participate in one of the following assistance programs:

- Medicaid;
- Supplemental Nutrition Assistance Program (Food Stamps or SNAP);
- Supplemental Security Income (SSI);
- Federal Public House Assistance (Section 8);
- Low-Income Home Energy Assistance Program (LIHEAP);
- Temporary Assistance to Needy Families (TANF);
- National School Lunch Program's Free Lunch Program;
- Bureau of Indian Affairs General Assistance;
- Tribally-Administered Temporary Assistance for Needy Families (TTANF);
- Food Distribution Program on Indian Reservations (FDPIR);

Exhibit E

Organizational Chart & Financial Information

(Contains CONFIDENTIAL)

Exhibit F

Key Management Bios

NORMAN KLUGMAN

A multi-talented leader and visionary, with 30 years of telecommunications experience, who is driven by a passion for excellence utilizing a strong combination of operational skills and financial acumen.

CAREER OVERVIEW

COO, Concentric Network Solutions, LLC June 2013 – Present. Manage operations for and initiate launch of Concentric's HUDconnect wireless service and Lifeline offering.

COO, Covista Communications May 2012 – March 2013. Covista is a CLEC operating in 32 states providing a full range of communication services. Positioned company to enter into a sale with a large competitor.

Vice President, Broadvox, Inc. November 2011 – April 2012. Broadvox is a leader in the industry in providing SIP products, hosted and unified communications.

COO, Stargate Mobile, Inc. Marc 2010 to October 2011. Created concept for prepaid mobile service and set company strategic direction. Fully engaged in product development, operations, sales and marketing for roll out of product. \ Company was merged with a sister company.

Managing Partner, Bradmon, LLC (business consulting organization) – 2003 to 2010 & 1996 to 2002. Managing Partner of consulting practice providing services to companies in telecommunications, technology and prepaid mobile industries.

COO / CFO, Net2Phone (\$100M telecommunications company) – February 2002 to May 2003. Net2Phone was the pioneer and leader in VoIP services for USA and international commercial and residential customers.

President / Founder, Trescom International (\$150M provider of telecom services) – 1994 to 1996. Authored comprehensive business plan and raised initial VC funding for new international focused startup. Set company strategic direction and hired senior management. Led company to an IPO. Company sold to Primus in 1997

Chief Operating Officer, WorldCom / ATC (\$1B telecommunications company) – 1989 to 1994. Directed corporate engineering, information technology and systems, customer support and corporate/strategic sales functions. Led ATC team during negotiations and sale to WorldCom.

Exhibit G

Proposed Lifeline Rate Plans

HUDconnect Lifeline

250 Anytime Minutes

(1 SMS text = 1 minute)

Net cost to Lifeline customer - \$0

- Free handset
- Free calls to 911 emergency services
- Free calls to Customer Service
- Free domestic long distance
- Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and Voicemail features
- No rollover

Additional Minutes

400 minutes for \$15.00

500 text messages for \$6.00

1000 text messages for \$11.00