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May 14, 2014

VIA ECFS

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

Re: Mobile Net POSA, Inc.
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 Mobile Net POSA, Inc.'s Compliance Plan.

Please be advised that Exhibit C is CONFIDENTIAL and PROPRIETARY, and a confidential version is being sent via overnight mail.

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,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
Attorneys for Mobile Net POSA, Inc.

Attachments

cc: Sharoz Yroshalmiane

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

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)	
)	
Mobile Net POSA, Inc.)	
Compliance Plan)	

MOBILE NET POSA, INC.'S COMPLIANCE PLAN

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May 13, 2014

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MOBILE NET POSA, INC.’S COMPLIANCE PLAN

I. INTRODUCTION

Mobile Net POSA, Inc. (“Mobile Net” 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 Mobile Net 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 to implement the conditions of forbearance outlined in the

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*”).

Order.² Given the severe economic environment that is forcing many low-income customers to forego wireless service, Mobile Net 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. MOBILE NET WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER

Mobile Net 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 ETCs to provide 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 Mobile Net 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 Mobile Net 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 an ETC providing only E911-compliant handsets to its Lifeline customers.⁶ Mobile Net will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing Mobile Net 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

Mobile Net 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, Mobile

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.*

Net will rely on the state identification or database.⁷ In instances where Mobile Net 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

Mobile Net 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, Mobile Net will check the National Lifeline Accountability Database (“NLAD”) to determine whether an individual at the applicant’s residential address is currently receiving Lifeline-supported service. Mobile Net 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 Mobile Net determines that an individual at the applicant’s address is currently receiving Lifeline-supported service, Mobile Net 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, Mobile Net will require applicants to complete and submit to the Company USAC’s one-per-household template, which will contain the following: (1) an explanation of the Commission’s one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant’s household and share in the household’s expenses or benefit from the applicant’s income; and (4) the penalty for a

⁷ See Order at ¶ 98.

⁸ See Order at ¶ 74.

consumer's failure to make the required one-per-household certification (i.e., de-enrollment).⁹ Mobile Net 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 Mobile Net will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery 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 Mobile Net 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, Mobile Net 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 Mobile Net's attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program.¹³ Also on its certification forms, Mobile Net 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, Mobile Net will update the NLAD with the information within 10 business days of receipt of the information.¹⁵

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

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.

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.*

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 state-specific eligibility criteria. Mobile Net's application form will identify that it is a "Lifeline" application. Mobile Net will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, that interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services.

Mobile Net's initial and annual certification forms will conform to the list of requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. Mobile Net'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.

Mobile Net 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 support documentation 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

Enrollment in person. The Company will primarily enroll Lifeline applicants in person. Mobile Net anticipates that it will enroll approximately 80% of its subscribers at retail locations using agents, and will potentially enroll 10% at Company events. When the Company hosts an event, it will set up a tent housing a table where customers can apply for Lifeline service, and will place signage around the event for identification; employees of the Company will be present along with agents. Whether at retail locations or Company events, Company employees, agents or representatives (“personnel”) trained in the Lifeline program will be equipped with a computer or tablet to assist potential customers with the application process electronically using CGM, LLC’s Enrollment Application (the “CGM App”).

When a prospective customer applies in person, Company personnel will ask to see a government issued ID and will validate the address via a USPS/Melissa Database. The Company will check the NLAD to confirm that the applicant is not already receiving a Lifeline subsidy from Mobile Net or any other ETC. If the customer indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC’s one-per-household template as well. In cases where an eligibility database exists, personnel will query the database to determine eligibility. In states 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. Mobile Net’s Lifeline application contains an “Office Use Only” section, which must be completely filled out and signed by Company personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food

¹⁶ See *Order* at ¶ 168.

Stamps) and a unique identifier (last 3 digits of document ID). Eligibility documents are returned to the customer after review. Finally, Mobile Net personnel 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. Upon successful completion of the certification process, the customer is allowed to receive their free phone in person. In instances where eligibility databases cannot be accessed in real-time, Mobile Net will mail the phone to eligible customers once verification of eligibility is complete. The customer's account is then activated upon the customer's personal initiation or actual use of the phone. The customer's first phone call will automatically route to the Company for activation purposes; this activation call will capture via IVR the customer's name and last four digits of SSN in order to verify that the person activating the phone is the intended recipient.

Enrollment by phone. Mobile Net will make phone enrollment available, but expects to enroll only a small percentage of subscribers using this method. With respect to those enrolling via the phone, Company personnel are able to verbally explain the Lifeline program and its eligibility requirements, including required information and disclosures, as well as collect and input electronically the application form information and obtain the applicant's signature via IVR. Company personnel will obtain applicant's verbal confirmation of each required certification. If the applicant indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC's one-per-household template as well. If no eligibility database is available, personnel will advise the applicant that they are required to provide proof of identity 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 as well as what documentation qualifies as proof of benefits. The Company will qualify the applicant

by accessing necessary databases (USPS/Melissa, NLAD, eligibility databases). If no eligibility database is available, the application will be placed in a “hold” status until the Company receives copies of the applicant’s proof documentation and government-issued ID, at which point Company personnel will review the documentation and complete the “Office Use Only” section of the application form, which must be completely filled out and signed by personnel in order 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). Mobile Net will destroy copies of proof documentation and deliver phones to eligible customers by mail. The customer’s account is activated upon the customer’s personal initiation or actual use of the phone. The customer’s first phone call will automatically route to the Company for activation purposes; this activation call will capture via IVR the customer’s name and last four digits of SSN in order to verify that the person activating the phone is the intended recipient.

Enrollment online. Mobile Net will make online enrollment available, but expects to enroll only a small percentage of subscribers using this method. When enrolling via the Internet, prospective customers will be able to fill out an application form online and sign electronically. Mobile Net will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.¹⁷ 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. If no eligibility database is available, the online interface will advise the applicant that they are required to provide proof of identity 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 as well as what

¹⁷ See *Order* at ¶ 123.

documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, NLAD, eligibility databases). If no eligibility database is available, the application will be placed in a “hold” status until the Company receives copies of the applicant’s proof documentation and government-issued ID, at which point Company personnel will review the documentation and complete the “Office Use Only” section of the application form, which must be completely filled out and signed by personnel in order 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). Mobile Net will destroy copies of proof documentation and deliver phones to eligible customers by mail. The customer’s account is activated upon the customer’s personal initiation or actual use of the phone. The customer’s first phone call will automatically route to the Company for activation purposes; this activation call will capture via IVR the customer’s name and last four digits of SSN in order to verify that the person activating the phone is the intended recipient.

General Enrollment & Training Procedures. Mobile Net 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, Mobile Net will check the eligibility of low-income consumers first by accessing state or federal social services electronic eligibility databases, where available.¹⁸ If a database is used to establish eligibility, Mobile Net will not require documentation of the consumer’s participation in a qualifying federal program; instead, Mobile Net or its representative will note in its records what specific data was relied upon to confirm the consumer’s initial eligibility for Lifeline.¹⁹

¹⁸ See Order at ¶ 97.

¹⁹ See Order at ¶ 98.

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 Mobile Net to check electronic databases for eligibility, Mobile Net will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.²⁰ Mobile Net will require acceptable documentation both for income eligibility and for program eligibility. The Company will not retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility.²¹ Mobile Net understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Mobile Net remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.²²

Mobile Net will provide Lifeline-specific training to all personnel – employees, agents, and representatives – designed to give them an understanding of Lifeline program requirements and permit them to review customer documentation and determine whether it is sufficient to establish a customer's eligibility to participate in the Lifeline program under the Commission's rules. No Company employee, agent, or representative may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material. Among other things, the Lifeline program training discusses the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training explains what sections of the form must be completed by the customer and reviews the form disclosures in detail, to facilitate the ability of employees, agents, or representatives to explain each item contained therein and answer any customer questions. Because the Company is responsible for the actions of all its personnel,

²⁰ See Order at ¶ 99.

²¹ See Order at ¶ 101.

²² See Order at ¶ 110.

including those enrolling customers in any Company-owned or agent retail locations, 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. Annual Re-Certification

Mobile Net understands that it must annually re-certify the eligibility of its entire Lifeline subscriber base and report the results to USAC by January 31 each year, and the Company may elect to perform this re-certification on a rolling basis throughout the year.²³ Mobile Net will re-certify the continued eligibility of all 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.²⁴ 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. Mobile Net 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. Mobile Net 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.²⁵

Alternatively, where a database containing consumer eligibility data is available, Mobile Net (or state agency or third-party, where applicable) will instead query the 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 state data, Mobile Net will

²³ See *Order* at ¶ 130.

²⁴ See *id.*

²⁵ See *Order* at ¶ 132.

contact the subscriber every year during the annual certification process to obtain a valid address.²⁶ Mobile Net understands that it has the option to elect USAC to administer the self-certification process on the Company's behalf.²⁷

Mobile Net 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 Mobile Net'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 official program eligibility data, such as a state or federal 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.²⁸

D. Other Reforms to Eliminate Waste, Fraud and Abuse

Mobile Net 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.

Mobile Net has implemented enrollment procedures designed to prevent subsidies for duplicate, ineligible, or inactive subscribers. The Company contracts with a third party Lifeline service bureau, currently CGM, LLC of Roswell, Georgia, to edit all subsidy request data. CGM

²⁶ See Order at ¶ 131.

²⁷ See Order at ¶ 133.

²⁸ See Order at ¶ 126-27.

will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): 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 (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described herein, Mobile Net ensures that it does not over-request from support funds.

During the Lifeline application process, the Company details all required disclosures with the applicant, including the one-per-household rule. As detailed in section III.C.2, Mobile Net validates each applicant's identity via a government issued ID card, passport, etc. Additionally, as mentioned above, Mobile Net 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 the Company representative can forge certification forms based on false names and addresses. Mobile Net validates the applicant's address via a USPS/Melissa Database to ensure the address is correct. Once the applicant's identity is confirmed, Mobile Net verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, Mobile Net checks the NLAD and any available eligibility database. If an eligibility database is not available, the applicant is required to provide proof of eligibility. This prevents ineligible applicants or duplicate subscribers from receiving the subsidy.

1. National Lifeline Accountability Database

Mobile Net will participate in the NLAD. Mobile Net 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.²⁹ As required by the *Order*, Mobile Net 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

Furthermore, on its certification form, Mobile Net will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the 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.³¹

2. Subscriber Usage

Mobile Net 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, Mobile Net will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.³² Mobile Net 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.³³ 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

²⁹ See *Order* at ¶ 203.

³⁰ See *Order* at ¶ 189.

³¹ See *Order*, Appendix C.

³² See *Order* at ¶ 257.

³³ See *id.*

affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.³⁴ Mobile Net utilizes tracking software to notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. Furthermore, a third party contractor validates the Company's subsidy data to prevent a subsidy request for customers that are inactive under the Company's non-usage policy.³⁵ After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the procedures outlined in section E below. Mobile Net 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.³⁶

3. Marketing & Outreach

Mobile Net 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. Mobile Net will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:³⁷ (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. Mobile Net's website and printed collateral will explain the documentation necessary for enrollment, and the details of Mobile

³⁴ See *Order* at ¶ 261.

³⁵ CGM, LLC is currently the Company's third party contractor.

³⁶ See *Order* at ¶ 262. 911 transmission will actually be performed by the Company's underlying facilities-based CMRS provider.

³⁷ 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.

Net's 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.³⁸ 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, Mobile Net will include the URL link for its website where disclosures will be listed. Additionally, Mobile Net will disclose the company name under which it does business.³⁹

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.⁴⁰ Mobile Net 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.⁴¹

E. De-Enrollment

If at any time a Mobile Net Lifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-enrollment requests. Mobile Net 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 Mobile

³⁸ See *Order* at ¶ 275.

³⁹ See *id.*

⁴⁰ See *Order* at ¶ 291.

⁴¹ 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.

Net's Lifeline program. Mobile Net 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).⁴²

If a customer does not respond to the Company's annual verification survey within 30 days, or if Mobile Net 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), Mobile Net 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.⁴³ Similarly, Mobile Net will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.⁴⁴

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,⁴⁵ Mobile Net 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. Mobile Net 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. Mobile Net will provide the subscriber 30 days' notice, using clear, easily understood language, that the

⁴² See Order at ¶ 122.

⁴³ See *id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

⁴⁴ See Order at ¶ 89.

⁴⁵ 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. Mobile Net will update the NLAD within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁶

F. Additional Rule Amendments

1. Terms and Conditions of Service

The Company's Lifeline offering is summarized in section IV.C below. Terms and conditions are subject to change as needed and will be maintained on the Company's website. The terms and conditions of the Company's retail plans, as generally available to the public and to which a Lifeline customer can apply their Lifeline discount, will also be maintained on the Company's website.

2. Reporting Requirements

Mobile Net 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.⁴⁷

⁴⁶ See Order at ¶ 257.

⁴⁷ 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."

3. Reimbursement from USAC

In seeking reimbursement for Lifeline, Mobile Net will comply with the requirements of C.F.R § 54.407, as revised by the *Order*.⁴⁸ Mobile Net will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,⁴⁹ and the Company will seek reimbursement for actual lines served, not projected lines.⁵⁰

4. Section 54.202 Certifications

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

IV. COMPANY INFORMATION

Mobile Net is a California corporation. Mobile Net provides prepaid wireless telecommunications services to consumers by using the network of its underlying carrier(s), currently Sprint Spectrum L.P. (“Sprint”) and T-Mobile. Sprint and T-Mobile are nationwide carriers that provide wholesale capacity on their wireless networks to resellers like Mobile Net. Mobile Net has a direct contract relationship with Sprint, and has access to the T-Mobile network through a contract with Prepaid Wireless Wholesale, LLC, a Mobile Virtual Network Enabler (“MVNE”). Through these resale agreements, the Company obtains the network infrastructure and transmission facilities to allow Mobile Net to operate as a Mobile Virtual Network Operator (“MVNO”) on the Sprint and T-Mobile wireless networks.

⁴⁸ See *Order* page 221.

⁴⁹ See *Order* at ¶ 128.

⁵⁰ See *Order* at ¶ 302.

A. Operations

Mobile Net POSA, Inc.'s primary business since it was incorporated in 2010 has hinged on its web-based point of sale and activation software which is being used by over 5,000 retail locations nationwide, giving them access to activate and sell more than 100 different wireless products and prepaid international calling and phone cards. Mobile Net has also recently begun to offer prepaid wireless services under the d/b/a Expo Mobile, and intends to offer both Lifeline and non-Lifeline prepaid wireless services under the d/b/a Jolt Mobile. Mobile Net does not have a holding company or operating company. Mobile Net's affiliates are as follows: (1) Network Enhanced Technologies ("NET"), which offers long distance service to business and residential customers. NET's nationwide service has served more than 500,000 subscribers for more than 15 years. For the past 7 years, NET has created different brands of PINless dialing for customers who wish to use their mobile phone to make international calls; some examples of NET's very successful brands are "Ilamex" (serving the Hispanic, specially Mexican market), "My011" (serving the Asian market), and "Itell" (serving the middle eastern market); and (2) Jolt Mobile, Inc. ("Jolt"), which provides prepaid wireless services using the AT&T wireless network. Jolt has activated over 30,000 subscribers and is growing.

Mobile Net intends to use the following third party vendors/contractors in relation to its Lifeline services: CGM, LLC for Lifeline compliance services; BeQuick software for billing, and to interface with LexisNexis to ensure more complete identity verification; and local agents for assistance in providing a point of presence for customers to apply for Lifeline.

B. Financial and Technical Capability

Mobile Net is financially and technically capable of providing Lifeline-supported services.⁵¹ Mobile Net has been in business for 3 years and currently receives only non-Lifeline revenue.

⁵¹ See *Order* at ¶ 387. See Exhibit C, which is filed confidentially, for financial statements.

Furthermore, the sole owner of Mobile Net is also the sole owner of NET, its affiliate which has been in business for 15 years and has a proven track record of success. Mobile Net has not been subject to enforcement action or ETC revocation proceedings in any state. Mobile Net is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. In the event that USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. The Company will continue to rely on its successful business model and service offerings to sustain and grow its business, independent of USF disbursements that provide discounts for qualifying Lifeline subscribers. Furthermore, the senior management of Mobile Net has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.⁵² Mobile Net will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carriers.

C. Customer Service

Mobile Net is dedicated to quality customer service and care. Lifeline customers can reach the Company's Customer Service department via phone, e-mail, or online. Mobile Net offers multi-lingual Customer Service that is available 24/7 by phone and on the web. The Company has a dedicated Customer Service staff that will handle all service requests, including elective de-enrollments as outlined in Section III.E above.

D. Lifeline Offering

Mobile Net will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carriers, currently Sprint and T-Mobile.⁵³ Mobile

⁵² See Exhibit D for key management resumes.

⁵³ 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.

Net is not currently designated as an ETC in any state. As summarized in Exhibit E attached hereto, the Company's Lifeline offering will provide customers with a free handset and 250 voice minutes and 250 SMS text messages each month at no charge. In lieu of the free plan option, customers may elect to apply their Lifeline discount to one of the Company's retail plans.

In addition, the Company's Lifeline offering will include access to Caller ID, Call Forwarding, Call Waiting, 3-Way Calling and Voicemail features at no cost. Mobile Net offers data capabilities and international calling, but these features will require additional funds to be added to the account beforehand, and these features can also be blocked at any time. Customers will have the ability to purchase additional airtime via the Company's website www.MobileNet.com, at select retail locations, or by calling Mobile Net Customer Service at no decrement in minutes. Additional airtime costs \$0.11 per minute of talk or \$.05 per text, and data costs \$0.25 per Megabyte; customers also have the option to upgrade to a different plan at any time, though they will only receive one Lifeline discount per month. Customers are not bound by a local calling area requirement; all Mobile Net plans come with domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Nationwide Sprint and T-Mobile wireless networks. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Calls to Mobile Net Customer Service are also free and do not deduct minutes. Mobile Net does not require burdensome credit checks or impose long-term service contracts on its prepaid customers.

V. **CONCLUSION**

Mobile Net 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, Mobile Net 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,

Mobile Net POSA, Inc.

/s/ Lance J.M. Steinhart

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

Its Counsel

Dated May 13, 2014

Exhibit A

Sample Lifeline Certification Form



700 South Flower Street Suite 420 Los Angeles, California 90017

APPLICATION FOR GOVERNMENT LIFELINE ASSISTANCE PROGRAM

A Complete and signed 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 purpose other than administration of the Lifeline program. This service is provided by Mobile Net POSA, Inc. 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 federal non-transferable benefit.
2. Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers.
3. A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.
4. Only eligible consumers may enroll in the program.
5. 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.

Please read all instructions before completing. Information will be validated and discrepancies could result in delays.

Last Name: _____ MI: _____

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

Social Security Number or Tribal ID Number (last 4 digits): _____ (XXX-XX-XXXX)

Home Phone: _____ Cell Phone: _____

Contact Phone: _____ Email Address: _____

Residence Address (NO P.O. Box): _____

Apartment No: _____ City: _____ State: _____ Zip: _____

This address is _____ Permanent _____ Temporary _____ Multi-Household

Billing Address (If different, may contain a P.O. Box): _____

Apartment No: _____ City: _____ State: _____ Zip: _____

To Apply for Mobile Net POSA, Inc.'s Lifeline Program choose one of the two options below:

Option 1 To qualify you must attach proof of participation in one of the programs listed below.

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

- Medicaid (Not the same as Medicare)
- Supplemental Nutrition Assistance Program (Food Stamps)
- Temporary Assistance to Needy Families (TANF)
- Supplemental Security Income SSI (Not the same as Social Security Benefits)
- National School Lunch Program's Free Lunch Program
- Low-Income Home Energy Assistance Program (LIHEAP)
- Federal Public Housing Assistance (Section 8)

Proof of Program Participation includes:

- Your benefit ID card or other program participation document
- An eligibility letter from an authorized agency
- A benefits statement (current or prior year)

Option 2 Qualify by certifying your income is at or below 135% of the federal poverty guidelines.

Household Income: Please check household persons and income level that applies. Eligibility may apply if your total household income is at or below the following guidelines.

Persons in Household	Annual Income	Monthly Income
1	\$15,754.50	\$1,312.88
2	\$21,235.50	\$1,769.63
3	\$26,716.50	\$2,226.38
4	\$32,197.50	\$2,683.13
5 or more*	\$37,678.50	\$3,139.88
*For each additional person, add:	\$5,481	\$456.75

____ I hereby certify that my household income is at or below 135% of the Federal Poverty Guidelines.
Initial Here

There are ____ individuals in my household.

To qualify by income you must attach proof of income. Submit your most current statement from sources below:

Any Documentation You Submit Will Not Be Returned

Three consecutive months of ONE of these statements OR ONE of these documents
 (from the previous 12 months):

- | | |
|---|--|
| <ul style="list-style-type: none"> • Your pay stub • Social Security benefits statement • Veterans Administration benefits statement • Retirement/Pension benefits statement • Unemployment benefits statement | <ul style="list-style-type: none"> • Prior year's State or Federal Income tax return • Income statement from employer • Federal letter of participation in General Assistance • Divorce decree or child support document containing income |
|---|--|

Total monthly household income Number of people receiving income

Total yearly household income Number of children under the age of 18

PENALTY OF PERJURY: Under title 18 U.S.C. §1621, whoever willfully states as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

I certify, under penalty of perjury: (Initial by 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% 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. Mobile Net POSA, Inc. 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 US 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 Mobile Net POSA, Inc. 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 Mobile Net POSA, Inc. to confirm that I want to continue receiving their services.

____ (8) I will notify Mobile Net POSA, Inc. 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 Mobile Net POSA, Inc. if:

(a) I cease to participate in the above Federal or State program, or my annual household income exceeds 135% FPG.

(b) My household is receiving more than one Lifeline supported device.

(c) I no longer satisfy the criteria for receiving Lifeline support.

____ (9) I will notify Mobile Net POSA, Inc. 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 Mobile Net POSA, Inc. every ninety (90) days. If I fail to respond to Mobile Net POSA, Inc.'s verification attempts within thirty (30) days, my Mobile Net POSA, Inc. Lifeline service may be terminated.

____ (10) Mobile Net POSA, Inc. has explained that I am required each year to re-certify my eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my Mobile Net POSA, Inc. service.

____ (11) I authorize and understand that Mobile Net POSA, Inc. 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.

Privacy Law

____ (Initial) I authorize Mobile Net POSA, Inc. or its duly appointed representative to: (1) access any records required to verify my statements herein; (2) to confirm my continued eligibility for Lifeline assistance; (3) to update my address to a proper mailing address format; and (4) authorize social service agency representatives to discuss with and/or provide information to Mobile Net POSA, Inc. verifying my participation in benefits programs that qualify me for the Lifeline assistance. I understand that completion of this form does not constitute immediate approval for Lifeline.

Please check this box if you would like to receive pre-recorded special offers and promotions for Mobile Net POSA, Inc. at the Home Telephone number provided in the contact information.

Applicant Signature: _____ **Date:** _____ **Please sign and date here**

Mail your application to: 700 South Flower Street Suite 420 Los Angeles CA 90017 For questions please call: 800.644.7990

Exhibit B

Sample Advertisements

(800) 644-7990 | MOBILENETUS.COM

IMPORTANT NOTICE | MOBILENET SERVICE INFORMATION

Notice by Law: MobileNet is a Lifeline-supported service and is only available for one phone per household, consisting of either wireline or wireless service. Lifeline is a government benefit program and is non-transferable. Only eligible consumers may enroll. Proof of eligibility is required. 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.
Web address: www.mobilenetus.com

Program Based Eligibility:
Federal Public Housing / Section 8
Food Supplement Program/ Food Stamps
Low Income Home energy Assistance Program
Medicaid Assistance
National School Lunch Program (free program only)
Temporary Assistance for Needy Families
Supplemental Security Income (SSI)
You may also be eligible based on income

Proof of Program Participation includes:

- Your benefit ID card or other program participation document
- An eligibility letter from an authorized agency
- A benefits statement (current or prior year)

Proof of Income includes either:

Three consecutive months of one of these statements (from the previous 12 months):

- Your pay stub
- Social Security benefits statement
- Veterans Administration benefits statement
- Retirement/Pension benefits statement
- Unemployment benefits statement

OR

ONE of these documents

- Prior year's State or Federal Income tax return
- Income statement from employer
- Federal letter of participation in General Assistance
- Divorce decree or child support document containing income



- **FREE CELLPHONE**
- **FREE MINUTES**
- **FREE TEXTS**

FREE 250MINUTES TALK & TEXT FREE ACTIVATION

(800) 644-7990 | MOBILENETUS.COM



- **FREE CELLPHONE**
- **FREE MINUTES**
- **FREE TEXTS**

Exhibit C

Financial Statements

CONFIDENTIAL AND PROPRIETARY

Exhibit D

Key Management Resumes

Sharoz Yroshalmiane

Accomplished Senior Executive with over twenty years of demonstrated success in leading technology organizations to optimal efficiency and profitability. Skilled in successful integration of latest technologies within organizations while introducing new revenue streams through formation of partnerships and marketing efforts to promote them. Adept at identifying the best business solutions and facilitating transition to ensure desired results are achieved. Highly skilled in information technology, strategic planning, team building, technology allocation and engineering. Skilled and experienced in managing operations abroad with strong international business acumen. Possess excellent people and critical communications skills to achieve results in management, collaboration, negotiating and fact-finding. Technologically sharp, capable of quickly adapting to unfamiliar, technically complicated areas and communicating well with others within them. Visionary leader with hands-on approach to managing and supporting organizations with maximum utility of available resources.

Mobile Net POSA, Inc. dba Expo Mobile, Jolt Mobile: Founder, Principal & Chief Executive (2012-present)

- Launched the service in October 2013 with both B2B and B2C strategy, combining the traditional nationwide talk and text with direct international calling and texting. Taking advantage of his 20 years of experience in the telecom and combining it with the new wireless technology
- Developed well-defined job descriptions, job evaluations based on specific performance criteria, and regular coaching and feedback processes, to ensure that the right foundation was established to foster the development of a sales culture.
- Built a critical five year rolling strategic business plan for staffing, technology, products and brand image
- Responsible for leading infrastructure-building including: site development, marketing plan, securing intellectual property, financial analysis and accounting, and identifying licensing targets
- Responsible for cash management, financial goals, business model optimization, talent acquisition, and sales/marketing strategy for growth.

Network Enhanced Technologies: CEO and president (2010 –present)

Serving as president and CEO of a multimillion-dollar IXC carrier. Full responsibility for bottom-line factors, including company vision, strategic planning, product management, and software development process.

Key Achievements:

- Created a more responsive and market-driven organization
- Substantially improved productivity while reducing staffing and operational cost
- Opened new marketing channels and established strategic and efficient restructuring
- Developed and introduced successful new products for international markets

Jolt Mobile: CEO and President (2009-Present)

- Acquiring Jolt Mobile (ATT MVNO) in 2009
- Placing Jolt mobile in 5000 locations nationwide
- Set the strategic goals to increase sales revenues 30% annually, and strengthen consumer awareness and relationships with trade channels; emphasis on disciplined, accountable, creative business management
- Expanded product categories and product line assortments, resulting in significant increases in share of business with each channel member and product market shares for each category
- Initiated and led implementation of the Quality Improvement Process (QIP)
- Built national marketing, sales, communications and administration teams

Network Enhanced Technologies: Executive Vice President (1995-2010)

- Successfully oversaw the start-up and development of this company from \$0 to \$20 million in revenue
- Enhanced the public image and recognition of the firm's name within the business community through new business development, community outreach, and aggressive networking
- Interfaced with partners and large clients to develop and maintain organizational strategies, operational efficiencies, and proposals for increasing technical efficiency and improving profitability
- Directed marketing strategies, business development plans, promotional activities, product development projects
- Oversaw the management of the company's operation team

Exhibit E

Proposed Lifeline Rate Plans

MobileNet

Lifeline Rate Plan

\$0 – Monthly net cost to Lifeline customer

- 250 Anytime Talk Minutes
- 250 SMS Text Messages
- No rollover

Also Includes:

- Free handset
- Free calls to 911 emergency services
- Free calls to Customer Service
- Free domestic long distance
- Access to Caller ID, Call Forwarding, Call Waiting, 3-Way Calling and Voicemail

Additional Airtime:

Voice Minutes:	\$0.11 per minute
SMS Text Messages:	\$0.05 per text
Data:	\$0.25 per Megabyte