

**VIA ECFS**

May 19, 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Dockets 09-197 and 11-42, Fifth Amended Compliance Plan of True Wireless, LLC**

Dear Ms. Dortch:

Please find the attached public version of the fifth amendment to True Wireless, LLC's compliance plan required by the *Lifeline Reform Order*.<sup>1</sup> True Wireless has also filed a confidential version of this document by hand delivery today.

Should the Commission have any questions about this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

Davis Wright Tremain LLP



Christopher W. Savage

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<sup>1</sup> *In Re Lifeline and Link Up Reform and Modernization et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (rel. Feb. 6, 2012).

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

In the Matter of

Lifeline and Link Up Reform and  
Modernization

Telecommunications Carriers Eligible to  
Receive Universal Service Support

True Wireless, LLC Petition for Designation as  
an Eligible Telecommunications Carrier for  
Low Income Support Only

WC Docket No. 11-42

WC Docket No. 09-197

**FIFTH AMENDED COMPLIANCE PLAN OF TRUE WIRELESS, LLC**

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## SUMMARY

True Wireless, LLC (“True Wireless”) submits this Fifth Amended Compliance Plan in order to qualify for the Commission’s grant of forbearance from the “own facilities” requirement in 47 U.S.C. § 214(e). True Wireless fully complies with all conditions of the currently effective Lifeline rules and all pertinent conditions in *Lifeline and Link Up Reform and Modernization et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012) (“*Lifeline Reform Order*”).

True Wireless is technically and financially qualified to provide Lifeline service. True Wireless launched operations as an ETC in 2010 and now provides Lifeline services in five states. True Wireless provides Lifeline-supported services to more than 40,000 subscribers. True Wireless is financially stable and is fully capable of honoring its service obligations.

True Wireless complies with the requirements pertaining to consumer qualifications for Lifeline set forth in 47 C.F.R. § 54.409 and all applicable state-specific requirements. Unless otherwise required under applicable state law, True Wireless requires all subscribers to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines; or (2) the household’s participation in one of the federal assistance programs listed in the Commission’s rules. True Wireless has procedures designed to confirm that neither the prospective subscriber nor anyone else in the prospective subscriber’s household is subscribed to a Lifeline service. This Fifth Amended Compliance Plan describes the procedures by which True Wireless: (1) analyzes the eligibility of applicants to obtain Lifeline service; (2) obtains proof of eligibility from applicants; (3) certifies the eligibility of applicants; (4) collects the necessary information from applicants; (5) requires applicants to certify as to their eligibility to receive Lifeline benefits; and (6) annually re-certifies all Lifeline subscribers. True Wireless

has included its application forms for its wireless Lifeline services as **EXHIBIT 3** to this Fifth Amended Compliance Plan.

True Wireless' practices comply with the 911/E911 access conditions in the *Lifeline Reform Order*. True Wireless provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated – regardless of activation status and availability of minutes – and provides its Lifeline subscribers with E911-compliant handsets. True Wireless' practices provide access to 911/E911 services to the extent these services have been deployed by its underlying carrier. True Wireless commits to continue these practices.

True Wireless has incorporated in its marketing materials for its Lifeline services, in clear, easily understood language, the disclosures required by 47 C.F.R. § 54.405. True Wireless has attached a representative sample of its marketing materials incorporating these disclosures as **EXHIBIT 4** to this Fifth Amended Compliance Plan.

True Wireless shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, True Wireless has implemented procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual. These measures include practices designed to: (1) prevent duplicates within True Wireless' subscriber base; (2) avoid reimbursement for any subscriber until the subscriber activates service; (3) cease reimbursement for subscribers who do not pay a monthly out-of-pocket fee or who fail to use the service for a 60-day period; and (4) ensure that True Wireless provides only one Lifeline service per household.

As detailed below, True Wireless' practices and procedures comply with the Commission's applicable Lifeline regulations and orders, and True Wireless commits to

continuing these practices. Accordingly, True Wireless respectfully requests approval of this Third Amended Compliance Plan, as well as its pending petitions for ETC designation.

## INTRODUCTION

True Wireless, through its undersigned counsel, submits this Fifth Amended Compliance Plan in order to qualify for forbearance by the Federal Communications Commission (“Commission”) from the own facilities requirement of 47 U.S.C. § 214(e)(1)(A).<sup>1</sup> This Fifth Amended Compliance Plan is filed in accordance with the procedures established in the *Lifeline Reform Order* and clarified the *Public Notice* issued by the Wireline Competition Bureau on February 29, 2012.<sup>2</sup>

True Wireless respectfully requests prompt approval of its Fifth Amended Compliance Plan and its Petition for designation as an eligible telecommunications carrier (“ETC”) in states that have declined jurisdiction over wireless carriers<sup>3</sup> so that it may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC, and so that it may provide service to additional eligible low-income consumers in the states to which its designation Petition with the Commission is pending.

As set forth below, True Wireless fully complies with all conditions set forth in the Commission’s currently effective Lifeline rules and with all applicable conditions set forth in the *Lifeline Reform Order*. This Compliance Plan describes the measures True Wireless has implemented to achieve full compliance with the Commission’s Lifeline rules and policies. For

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<sup>1</sup> True Wireless owns some of its own facilities, including a switch that routes operator service and directory assistance calls, but True Wireless nonetheless seeks forbearance from the “own facilities” requirement referenced above.

<sup>2</sup> Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, Public Notice, 27 FCC Rcd 2186 (WCB rel. Feb. 29, 2012) (“Public Notice”).

<sup>3</sup> *True Wireless, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, Petition, WC Docket No. 09-197 (filed Dec. 22, 2011, and amendments filed on Mar. 29 and May 25, 2012). True Wireless intends to refresh and update this pending Petition in the near future.

the convenience of the Commission, this Compliance Plan follows the format established by the Wireline Competition Bureau in the *Public Notice*, supplemented by certain exhibits (some of which are confidential) to address matters raised in the letters from the Telecommunications Access Policy Division (“TAPD”) dated February 15, 2013 (the “February 15, 2013 Letter”) and May 2, 2014 (the “May 2, 2014 Letter”).

## **I. INFORMATION ABOUT TRUE WIRELESS AND THE LIFELINE PLANS IT OFFERS**

### **A. Company Information<sup>4</sup>**

True Wireless is an Oklahoma limited liability company, with headquarters in Bartlett, Tennessee. True Wireless’ 100%, direct parent is True Wireless Acquisition Group, LLC, which is, in turn, 100% directly owned by Kevin Brian Cox, who more commonly goes by the name of Brian Cox. True Wireless Acquisition Group, LLC provides no services and serves only as a holding company. True Wireless has no subsidiaries and operates under the name “True Wireless.”<sup>5</sup> True Wireless has no affiliates that participate in the Lifeline or any other federal universal service program. Mr. Cox owns a non-controlling interest in 321 Communications, Inc., a CLEC, interexchange carrier, and Mobile Virtual Network Enabler (“MVNE”). Mr. Cox also owns a majority interest in Prepaidworx, LLC, which is not a telecommunications carrier but which facilitates consumer payments for prepaid services (including True Wireless’ services) on-site at third-party retailers through its physical payment terminals and web-based application.

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<sup>4</sup> Please see **CONFIDENTIAL EXHIBIT 6** and **CONFIDENTIAL EXHIBIT 7** for certain information relating to True Wireless being provided in response to the February 15, 2013 Letter and the May 2, 2014 Letter.

<sup>5</sup> True Wireless has registered the following additional d/b/a names in Texas: “Government Wireless Benefits,” “Total Communication Services” and “USA Government Phones.” It has not used these names to markets its services (other than utilizing the URL [www.usagovphone.com](http://www.usagovphone.com), which simply redirects users to True Wireless’ online form), but may do so in the future.

Finally, Mr. Cox owns 100% of Contigo Wireless LLC, which offers international-only calling cards.<sup>6</sup>

## **B. True Wireless' Financial and Technical Capabilities to Provide Lifeline Service<sup>7</sup>**

True Wireless has been operational since mid-2010 and focuses on providing service to low-income consumers. To date, the company has been designated as an ETC in five states: Arkansas, Maryland, Oklahoma, Rhode Island and Texas. As of the date of this Fifth Amended Compliance Plan, True Wireless has an ETC designation petition pending with the Commission for ten states.<sup>8</sup> True Wireless does not seek, and will not accept, High Cost support in any of those states, or in the states in which it currently provides service.

True Wireless is successfully providing Lifeline supported services in the states where it is an ETC. Following implementation of stringent pre-sign-up identity verification procedures

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<sup>6</sup> Other entities that qualify as affiliates of True Wireless due to common ownership interests are: 52 LLC (asset holding and management company); Axia Management, LLC (service company for True Wireless and other entities); Benefits Management, LLC (debt reduction; also uses d/b/a of Ox-Kan Arms, for firearms sales); Brother Properties, LLC (property holding company); CardDawg Investments, LLC (real estate); Car Haul USA, LLC (inactive); ContigoCard, LLC (inactive); Cox Asset Management, LLC (estate planning); Creditcardworx, LLC (not yet operational); Dealer Select LLC (used car sales); Domestic Investments, LLC (asset holding company); EWP, LLC (real estate); EWP Communication, LLC (consulting services); GSD Asset Management LLC (real estate); Hemisphere Holdings (asset holding company); Huevos Enterprises, LLC (inactive); KCS Exotic Cars, LLC (vehicle maintenance and customization; uses d/b/a KCS Performance); King Homes 38, LLC (realty company – residential rental properties); KLLC, LLC (real estate); Lucken, LLC (manages assets and investments); Market Maker, LLC (athletic training facility); Movilfon, LLC (currently inactive); OnTrack Realty, LLC (property management company, in process of shutting down; used d/b/a Remax on Track); Ox-Kan, LLC (inactive); Racer Management, LLC (owns warehouse); Retrogreen Technologies, LLC (inactive); SMDMM Funding, LLC (funds other entities); Southeast Equity Alliance, LLC (real estate); Wirellesspins.com LLC (not yet operational, consumer payments for prepaid wireless services); and Xtreme Fitness, LLC (fitness and training center). None of these entities are telecommunications carriers.

<sup>7</sup> Please see **CONFIDENTIAL EXHIBIT 6** and **CONFIDENTIAL EXHIBIT 7** for certain information relating to True Wireless being provided in response to the February 15, 2013 Letter and the May 2, 2014 Letter.

<sup>8</sup> The states included in True Wireless' petition and subsequent amendments filed with this Commission are: Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia. As noted above, True Wireless plans to update and amend that petition in the near future. Certain previously pending applications in various individual states have been withdrawn, or are in the process of being withdrawn, without prejudice.

and full implementation of the Commission's rules for de-enrollment for non-usage and recertification, True Wireless has experienced a decline in its total number of customers. Even so, as of the date of this Fifth Amended Compliance Plan, True Wireless serves more than 40,000 subscribers. True Wireless owns and operates switching facilities through which operator services and directory assistance calls are routed, as well as back-office and operations support systems ("OSS") tailored to serving lower revenue subscribers. True Wireless has invested millions of dollars to evaluate, design, develop and integrate these systems, and has a management team with significant experience in the telecommunications industry. Short resumes of the key members of this team are attached hereto as **EXHIBIT 1**.

True Wireless is financially stable and fully capable of honoring its service obligations to customers as well as federal and state regulatory obligations. True Wireless derives a large majority of its revenue from the sale of prepaid wireless services under the Lifeline program; this has been the case for essentially all of True Wireless' operating history. However, through efficient operations, those payments are fully sufficient to cover True Wireless' normal operating expenses. In addition, True Wireless derives some further revenue from the sale of wireless services with respect to certain of its wireless plans that are not fully covered by the Lifeline subsidy, the sale of wireless services to non-Lifeline customers, the sale of replenishment airtime minutes, and the sale of optional service packages (*e.g.*, Internet/text services).<sup>9</sup>

True Wireless's ETC status has not been revoked in any state. In Oklahoma, the staff of the Oklahoma Corporation Commission ("OCC") has initiated proceedings involving True

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<sup>9</sup> It has been suggested that the TAPD may have concerns about ETCs that focus essentially exclusively on the provision of subsidized Lifeline services. This is not a reasonable basis for concern, however. The nature of the target customer base for the Lifeline program is such that it is unrealistic to expect large, diversified carriers to devote the resources needed to fully reach that customer base. This means that success in actually meeting the needs of the customer base depends on smaller firms that focus on its unique characteristics and needs, including firms such as True Wireless.

Wireless and a variety of other ETCs regarding the ETCs' performance with respect to two issues: (a) eliminating intra-company duplicate subscribers; and (b) ensuring that the ETCs' customers reside within the ETC's authorized service territory. True Wireless has worked cooperatively with the OCC staff to resolve its concerns. With respect to intracompany duplicates, True Wireless has provided extensive information regarding its Oklahoma subscriber lists, including formatting those lists in a manner to facilitate the OCC staff's independent review for potential duplicates. As far as True Wireless is aware, it has provided the OCC staff all of the information that the OCC staff has requested with regard to these issues. With respect to territory boundary issues, True Wireless has worked with the OCC staff to develop mapping software to identify as precisely as possible the boundaries of the various ILEC service territories within which True Wireless is authorized to operate, which do not always track ZIP codes or similar readily identifiable areas.<sup>10</sup>

At the Commission, True Wireless received a Notice of Apparent Liability ("NAL") dated November 1, 2013, based on claims that, in certain past periods, approximately 0.12% (that is, about one-tenth of one percent) of True Wireless' subscribers were intra-company duplicates, *i.e.*, that 99.88% of True Wireless' subscribers were not duplicates. The theory of the NAL appears to be that True Wireless' failure to have achieved an even higher level of avoidance of duplicates should result in forfeitures.<sup>11</sup> True Wireless filed its formal response to

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<sup>10</sup> A key challenge with regard to this latter issue is situations where the relevant boundary line between affected ILEC territories (that also define wireless ETC territories) literally splits a ZIP code in two. In that situation, it is possible that one customer within a given ZIP code will reside within an ETC's service territory while another nearby customer in the same ZIP code will not. In True Wireless' view, it would be entirely reasonable to treat a customer – particularly a mobile customer – as being located within an ILEC's territory for purposes of obtaining wireless services, as long as the ILEC served at least part of the customer's ZIP code. However, it appears that the OCC staff is interested in even greater precision, which is what requires the development of new mapping tools.

<sup>11</sup> As explained in True Wireless' response to the NAL, USAC's claimed 0.12% duplicate rate actually overstates the number of duplicates in True Wireless' subscriber base during the relevant period.

the NAL on January 10, 2014. In that response, True Wireless (in addition to explaining a variety of legal defects in the NAL) explained that as a factual matter, as far as True Wireless can determine, it had effectively eliminated the presence of intra-company duplicates in its subscriber base by approximately June 2013, well before the NAL was issued. True Wireless believes that its processes and procedures for preventing inadvertently signing up duplicate customers, and removing any such customers that slip by from subscriber rolls prior to submitting for reimbursement from the fund, are at least as effective as, and quite possibly more effective than, those of any other ETC in the industry.

### **C. Geographic Area of True Wireless' Service Offerings**

True Wireless provides wireless ETC service in the following states: Arkansas, Maryland, Oklahoma, Rhode Island and Texas. The company intends to expand its operations once its pending ETC application is approved by the Commission.

### **D. True Wireless' Lifeline Service Plans**

In **Arkansas, Maryland, Rhode Island and Texas**, True Wireless is currently offering the following prepaid wireless service plan under the Lifeline program: 250 minutes of nationwide calling for a monthly charge of \$9.25 for non-Lifeline subscribers, and no monthly charge for Lifeline subscribers after application of the standard \$9.25 discount.<sup>12</sup> Under this plan, additional minutes are available for purchase at different prices depending on how many

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Based on True Wireless' analysis, during that time its accuracy rate was approximately 99.98%, with an error rate of only 0.02% – that is, an error rate of two-one-hundredths of one percent. *See In the Matter of True Wireless, LLC*, Response of True Wireless LLC to Notice of Apparent Liability for Forfeiture, File No.: EB-IHD-13-00011727 (filed January 10, 2014). True Wireless is providing a copy of its response to the pending NAL as **CONFIDENTIAL EXHIBIT 5** hereto.

<sup>12</sup> True Wireless expects to offer this plan in the ten states subject to its Petition pending before the Commission. True Wireless will update that Petition to reflect this plan. Certain customers who earlier elected a 90-minute-per-month plan remain grandfathered on that plan.

minutes are purchased.<sup>13</sup> Unused minutes do not carry over to the following month. The service in these states includes a 911-compliant handset and the following at no additional charge: voicemail, call waiting, caller ID, balance inquiries and calls to emergency 911 services. Subscribers who use the service outside of True Wireless' service area incur a roaming charge of \$0.59 per minute.<sup>14</sup> The rate for directory assistance calls is \$2 per request. True Wireless blocks international calls for its Lifeline subscribers at no additional charge.

In **Oklahoma**, True Wireless offers two plans for Lifeline customers in its service territory, which is almost entirely Tribal in nature. The first plan includes an unlimited number of minutes (and unlimited texting) for a monthly fee of \$1.00 after application of the standard \$34.25 Tribal Lifeline discount. The second plan, also with a monthly fee of \$1.00 after the discount, includes 1,000 minutes per month, with the option to use text messaging as well, at the rate of 1 text = 1 minute. All other terms and conditions are identical to those of the 250-minute plan described above.

#### **E. Other Certifications Required by 47 C.F.R. § 54.202**

The *Public Notice* requires carriers to include certifications required under 47 C.F.R. § 54.202. True Wireless hereby certifies that it complies with the service requirements applicable to the support it receives, and will continue to do so.<sup>15</sup> Specifically, True Wireless' Lifeline

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<sup>13</sup> The rates are as follows: \$5.00 = 100 minutes; \$10.00 = 250 minutes; \$15.00 = 700 minutes; \$20.00 = 1000 minutes. True Wireless works regularly with MVNEs and underlying providers of wireless services to obtain improved pricing and other features, and will periodically update its calling plans to reflect the results of those discussions.

<sup>14</sup> Roaming charges are very rarely incurred by True Wireless' Lifeline subscribers because it is True Wireless' policy to prevent or reduce to a minimum the number of instances where its subscribers are provided service through roaming arrangements. Specifically, True Wireless has two underlying carriers to choose from and puts its subscribers on the network that is better suited to avoid roaming charges to the extent possible. Because True Wireless' services are prepaid, customers do not incur out-of-pocket costs in the rare instances where roaming charges would apply. Instead, True Wireless deducts roaming minutes at a higher rate than non-roaming minutes, generally on a twelve to one ratio.

<sup>15</sup> 47 C.F.R. § 54.202(a)(1).

services: (i) include voice telephony services that provide voice grade access to the public switched network or its functional equivalent; (ii) provide subscribers with a defined number of minutes of usage for local service at no additional charges (as described above in Section I(D)); (iii) provide subscribers with access to the emergency services provided by local government or other public safety organizations, such as 911/E911, to the extent the local government in True Wireless' service area has implemented 911/E911 systems (as described below in Section III); and (iv) toll limitation for qualifying low-income consumers.<sup>16</sup>

## **II. TRUE WIRELESS COMPLIES WITH THE COMMISSION'S RULES RELATING TO DETERMINATIONS OF SUBSCRIBER ELIGIBILITY FOR LIFELINE SERVICES**

True Wireless complies with the requirements pertaining to Lifeline consumer qualification set forth in 47 C.F.R. § 54.409.<sup>17</sup> True Wireless also complies with all additional state requirements in those states in which it has been designated an ETC, and will comply with all requirements in states where it is designated an ETC in the future. More specifically, True Wireless requires all subscribers to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in 47 C.F.R. § 54.409(a)(2) or 47 C.F.R. § 54.409(a)(3). True Wireless also confirms that the subscriber is not

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<sup>16</sup> Toll limitation means both toll blocking and toll control, or, if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control. True Wireless commits to meeting this requirement by offering service on a prepaid, or pay-as-you-go, basis. As the Commission found in its grant of ETC designation to Virgin Mobile, "the prepaid nature of [a prepaid wireless carrier's] service offering works as an effective toll control." *In Re Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, 24 FCC Rcd 3381, 3394 at ¶ 34 (2009). Moreover, True Wireless' calling plans do not distinguish between local or toll services, and offer nationwide calling. True Wireless will provide this toll control to qualifying low income consumers at no additional charge.

<sup>17</sup> 47 C.F.R. § 54.509.

already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service.<sup>18</sup>

True Wireless has used several forms of marketing for its Lifeline supported services, which include direct mail, Internet advertising, television and radio advertisements, and door-to-door and live events conducted by third party marketing firms. The company is now focusing its efforts on live events and True-Wireless-operated and -branded retail stores, which makes it easier for prospective subscribers to provide proof of eligibility. These marketing channels are intended to induce potential subscribers to contact True Wireless either in person (at retail locations and at live events), over the Internet or by telephone. Although the logistics of the enrollment process varies somewhat for each marketing channel as is further described below, in all cases, Lifeline applicants are thoroughly screened to ensure that they are qualified before a handset is delivered. True Wireless' call center is monitored by a compliance department. That compliance department is monitored by employees at its headquarters. These employees monitor calls on a daily basis to ensure the proper supervision of and compliance by the customer service representatives ("CSRs") with applicable rules and the company's compliance policies. True Wireless utilizes information gathered during this process to continually train its CSRs and call center compliance managers.

Moreover, all third party marketing firms (and all these firms' employees or agents) are contractually obliged to follow all applicable rules and True Wireless' compliance policies, which are embodied in the text of the firms' contracts with True Wireless. Each individual (employee or agent) engaged in selling the services must sign a "Lifeline addendum," which is an addendum to the marketing firm's master service agreement with True Wireless. This

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<sup>18</sup> 47 C.F.R. § 54.409(c).

Lifeline addendum spells out the Lifeline rules and policies that must be complied with and the consequences for failure to do so. True Wireless' retail personnel (whether employees or contractors) enter orders directly into True Wireless' customer management system, which rejects any order for an address outside of True Wireless' authorized service area. To the extent that True Wireless uses contractors, it intends to have exclusive arrangements such that it will only employ one marketing firm per state, which allows for greater control over its marketing channels. In order to motivate compliance, True Wireless includes in its contracts with these firms that no commission is paid on any sale that fails to be fully compliant with all Lifeline rules. The marketing firm is also responsible for reimbursing True Wireless for any handset distributed for any non-compliant sale.

Finally, starting in July 2012, True Wireless began using True-Wireless-operated and –branded retail stores as its primary marketing outlet in Oklahoma. As of the date of this Fifth Amended Compliance Plan, in an effort to make its field operations more efficient, True Wireless has opened or authorized the opening of thirteen (13) retail locations, primarily in the Tulsa and Oklahoma City metro areas. True Wireless currently has an ongoing expansion program that includes new retail locations in areas of high customer density in rural areas of the state. Retail locations are a means to attract and authorize new program participants. The most useful function of retail locations, however, is that it gives True Wireless the ability to provide our clients a destination to seek technical support by a trained customer service agent. All True Wireless retail locations employ the same compliance safeguards as are applied to third party marketing firms, including the safeguards of True Wireless' customer management system, and financial and contractual incentives to fully comply with all Lifeline rules. True Wireless retail personnel are required to complete a training program that focuses on the importance of the

company's compliance model; in addition, trainees learn customer service skills, giving them the tools necessary to address any client issue that may arise.

**A. True Wireless' Procedures to Determine Consumer Eligibility for the Lifeline Program**

If True Wireless cannot determine an applicant's eligibility for Lifeline by accessing income or program eligibility databases, True Wireless personnel (employees, third party customer service representatives, third party marketing firms at live events, or retail store representatives) review documents to establish eligibility in accordance with the criteria set forth in 47 C.F.R. § 54.409. All True Wireless personnel who interact with existing Lifeline customers or Lifeline applicants are fully trained to understand the Commission's Lifeline eligibility rules and True Wireless' practices and policies designed to implement these rules.

True Wireless follows the Commission's requirements pertaining to acceptable documentation to establish eligibility based either on income level or participation in a qualified government assistance program, unless otherwise established by a state Lifeline administrator or other state agency. Specifically, acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program ("SNAP") electronic benefit transfer card or Medicaid participation card (or copy thereof); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.<sup>19</sup> Acceptable documentation of income eligibility includes: (1) the prior year's state, federal, or Tribal tax return; (2) current income statement from an employer or paycheck stub; (3) a Social Security statement of benefits; (4) a Veterans

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<sup>19</sup> Lifeline Reform Order at ¶ 101.

Administration statement of benefits; (5) a retirement/pension statement of benefits; (6) an Unemployment/Workers' Compensation statement of benefit; (7) federal or Tribal notice letter of participation in General Assistance; or (8) a divorce decree, child support award, or other official document containing income information. If the prospective subscriber presents True Wireless with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.<sup>20</sup> True Wireless personnel examine and record the type of documentation presented by each prospective Lifeline subscriber, but do not retain copies of these documents.<sup>21</sup> If an applicant is unable to provide documentary proof of eligibility based on either household income level or current participation in a qualified program, True Wireless denies that application.

#### **B. True Wireless' Procedures for Subscriber Certifications**

In the *Lifeline Reform Order*, the Commission established a path for a transition to a national database, the National Lifeline Accountability Database ("NLAD"), to be used to confirm the initial and continued eligibility of a Lifeline customer.<sup>22</sup> True Wireless has begun utilizing that database in all of the states in which it operates (except for Texas) in conjunction with any additional state databases and enrollment requirements. Where the national database is not available, however, True Wireless will continue to use relevant state databases where available (such as the Texas Solix database), and otherwise adhere to the following procedures for enrolling prospective customers into the Lifeline program.

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<sup>20</sup> 47 C.F.R. § 54.410(b)(1)(i)(B).

<sup>21</sup> 47 C.F.R. § 54.410(b)(1)(ii) - (iii); 47 C.F.R. § 54.410(c)(1)(ii)-(iii).

<sup>22</sup> See *Lifeline Reform Order* at ¶ 403.

True Wireless has implemented certification procedures that enable prospective customers to demonstrate their eligibility by contacting True Wireless either in person or by telephone, facsimile or over the Internet. True Wireless has direct contact with all prospective customers applying for Lifeline service, either in person through its employees or third party marketing firms at live events, representatives at third party retail locations, or by telephone, facsimile or over the Internet. At live events and retail locations, True Wireless representatives examine the qualifying documentation in person or, if the applicant does not have the documentation at the time, direct the applicant to supply the documentation via fax or electronic delivery. Prospective customers who do not complete True Wireless' Lifeline Application in person must return the signed document and eligibility documentation to True Wireless by mail, facsimile, electronic mail or other electronic transmission. True Wireless accepts electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006 and any applicable state laws, and is submitting as **Exhibit 2** a script for oral certifications in which it has drafted consumer-friendly language that captures all information required by the Commission's certification requirements.<sup>23</sup>

Every prospective subscriber is required to complete True Wireless' "Lifeline Application."<sup>24</sup> True Wireless' Lifeline Applications for the states in which it currently operates is attached hereto at **Exhibit 3**. These Lifeline Applications conform to the requirements of the *Lifeline Reform Order*, 47 C.F.R. § 54.410(d) and 47 C.F.R. § 54.405.

True Wireless collects the following information from a prospective subscriber in its Lifeline Application forms: (1) the subscriber's full name; (2) the subscriber's full residential

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<sup>23</sup> See *Lifeline Reform Order* at ¶ 168; 47 C.F.R. § 54.419.

<sup>24</sup> In Texas, True Wireless now obtains the Lifeline certification form directly from the consumer, but utilizes the state database to confirm eligibility, per the revised procedures required by the Public Utility Commission of Texas.

address (P.O. Boxes are not permitted); (3) whether the residential address is permanent or temporary; (4) the subscriber's billing address, if different; (5) the subscriber's date of birth; (6) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (8) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>25</sup> Finally, any prospective subscriber who resides at an address occupied by multiple households must complete a separate Lifeline Household Worksheet.<sup>26</sup>

In accordance with 47 C.F.R. § 54.410(d), in its Lifeline Applications, True Wireless requires all Lifeline applicants to certify, under penalty of perjury, that: (1) the subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the subscriber will notify True Wireless within 30 days if, for any reason, he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit; (3) if the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, that he or she lives on Tribal lands; (4) if the subscriber moves to a new address, that he or she will provide that new address to True Wireless within 30 days; (5) if the subscriber provided a temporary residential address to True Wireless, the subscriber will verify his or her temporary residential address every 90 days upon the final effective date of this rule; (6) the subscriber's

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<sup>25</sup> 47 C.F.R. § 54.410(d)(2).

<sup>26</sup> See *Lifeline Reform Order* at ¶ 79.

household will receive only one Lifeline service and, to the best of the applicant's knowledge, the subscriber's household is not already receiving a Lifeline service; (7) the information contained in the subscriber's application/certification form is true and correct to the best of the subscriber's knowledge; (8) the subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; (9) the subscriber acknowledges that he or she may be required to re-certify his or her continued eligibility for Lifeline at any time, and that his or her failure to re-certify as to continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits; and (10) that True Wireless is authorized to (a) access any records required to verify the subscriber's statements on the form and to confirm eligibility under the Lifeline program and (b) release any records required for the administration of the Lifeline program (*e.g.*, name, telephone number and address), including to USAC, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program.<sup>27</sup>

In accordance with 47 C.F.R. § 54.410(d)(1), True Wireless' Lifeline Application forms disclose the following information: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the subscriber's de-

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<sup>27</sup> See Exhibit 3.

enrollment from the program; and (6) Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.<sup>28</sup>

Finally, in accordance with 47 C.F.R. § 54.405(c), True Wireless' Lifeline Application indicates, using easily understood language, (1) that True Wireless' low income targeted service is a Lifeline service; (2) that Lifeline is a government assistance program; (3) that the service is non-transferrable; (4) that only eligible consumers may enroll in the program; and (5) that the program is limited to one discount per household.<sup>29</sup>

### **C. True Wireless' Procedures for Annual Verification of Lifeline Customers**

In accordance with the requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410(f), True Wireless annually re-certifies all of its Lifeline subscribers by either (1) querying the appropriate eligibility or income databases, confirming that the subscriber continues to meet the program- or income-based eligibility requirements for Lifeline and documenting the results of that review, or (2) obtaining a signed certification from the subscriber that meets the certification requirements set forth in 47 C.F.R. § 54.410(d).

For 2013, True Wireless completed the re-certification of its subscriber base by the end of 2013, and the results were reported to USAC in a timely manner.<sup>30</sup> True Wireless notifies subscribers in writing that a failure to respond to the recertification request will result in de-enrollment in the Lifeline program.<sup>31</sup> True Wireless de-enrolls subscribers who do not respond to the annual verification or fail to provide proof of continued eligibility in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(4).

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<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> *Lifeline Reform Order* at ¶ 130.

<sup>31</sup> *Id.* at ¶ 142.

True Wireless permits subscribers to re-certify their eligibility for Lifeline benefits through the following ways: an online form on its website ([www.gotruewireless.com](http://www.gotruewireless.com)); an oral re-certification by calling True Wireless' call center (which is recorded); or a paper form that can be scanned and e-mailed, faxed or handed to a third party marketing firm and forwarded to True Wireless.

### **III. TRUE WIRELESS' COMPLIANCE WITH THE FORBEARANCE CONDITIONS RELATING TO PUBLIC SAFETY AND 911/E911 ACCESS**

True Wireless' existing practices comply with the 911/E911 access conditions set forth in paragraph 373 of the *Lifeline Reform Order*. Specifically, True Wireless currently: (1) provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated, regardless of activation status and availability of minutes, and (2) provides its Lifeline subscribers with E911-compliant handsets and replaces, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services. True Wireless' existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying wireless carrier. True Wireless commits to continue these practices going forward.

### **IV. TRUE WIRELESS' COMPLIANCE WITH THE COMMISSION'S MARKETING AND DISCLOSURE REQUIREMENTS FOR PARTICIPATION IN THE LIFELINE PROGRAM**

True Wireless has incorporated into its marketing materials<sup>32</sup> for its Lifeline services, in clear, easily understood language: (1) that the service is supported by Lifeline, a government program; (2) that only eligible consumers may enroll in the program; (3) that documentation is necessary for enrollment; and (4) that the benefit is limited to one per household and is non-

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<sup>32</sup> "Marketing materials" includes, but is 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 *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).

transferrable.<sup>33</sup> True Wireless also discloses its name on all marketing materials.<sup>34</sup> A sample advertisement incorporating this language is attached hereto at **Exhibit 4**.

**V. TRUE WIRELESS' PROCEDURES AND EFFORTS TO PREVENT WASTE, FRAUD AND ABUSE IN CONNECTION WITH LIFELINE FUNDS**

True Wireless shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, True Wireless has implemented a variety of measures and procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual.

**Prevention of Duplicates within True Wireless' Subscriber Base.** True Wireless has implemented what it believes to be industry-leading policies and procedures to drive the number of intra-company duplicate subscribers to an absolute minimum, if not to eliminate such duplicate subscribers entirely. These procedures are discussed in detail in **CONFIDENTIAL EXHIBIT 5** (True Wireless' NAL response).

At the time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the United States Postal Service ("USPS") database and saved in the USPS-approved format, which permits True Wireless' subscriber database to more accurately prevent duplicates by preventing variations of the same address from appearing multiple times in the database. At live events and retail locations, True Wireless' representatives can access the True Wireless database in order to perform these functions remotely. Once the address is validated for accuracy and format, it is checked against addresses for all True Wireless addresses. If an existing True Wireless subscriber is receiving service at the same address, True Wireless' system will not permit any order for Lifeline service to proceed. Moreover, all orders for Lifeline service are subjected to a secondary USPS accuracy and format check the following

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<sup>33</sup> *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(c).

<sup>34</sup> *Lifeline Reform Order* at ¶ 275; 47 C.F.R. § 54.405(d).

day. Any corrections needed as a result of the secondary check, such as correcting address format, are promptly entered into True Wireless' system.

In addition to signing a form that attests that the customer is not receiving any other subsidized service, the customer must provide proof of identity (*e.g.*, a driver's license) that includes the customer's name and address, as well as providing the date of birth ("DOB," typically available on the ID) and the last four digits of the Social Security number ("SSN"). Once this data is entered into the system, the database automatically checks for any other customer with the same DOB and last four SSN digits; any other customer with the same first and last name and last four SSN digits; and any other customer with the same first and last name and same DOB. Furthermore, new customer information is also tested against a consumer credit data service run by LexisNexis that validates the information, and produces a "score" indicating the system's degree of confidence in the validity of the presented identity information. True Wireless's practice is to reject a claimed identity with an insufficient score from the LexisNexis system. Only customers who pass both the internal BeQuick check and the LexisNexis check will be signed up for service. Also, because the LexisNexis system verifies a customer's stated Social Security number, the new system makes it difficult or impossible for a prospective customer to provide a similar name to what they have used in the past (*e.g.*, "Johnny Smith" versus "John Smith") and still be treated by the system as a separate customer. If the prospective customer uses an incorrect Social Security number, that will be flagged by LexisNexis as an error; if the prospective customer uses the correct Social Security number, that will be flagged by BeQuick as a duplicate. True Wireless was advised of the availability of the LexisNexis service through BeQuick in early 2013 and implemented it shortly thereafter, with beta testing in May 2013 and full operation in June 2013. Implementation of the more robust BeQuick screening

process – which BeQuick designed, in part, based on input from True Wireless – began in approximately December 2012.

While the process of screening for possible duplicate customers necessarily relies heavily on computerized checks implemented via the BeQuick and LexisNexis processes, True Wireless has also adopted a variety of combined human/computer reviews that it applies to its customer lists each month in advance of actually submitting its Form 497 for a given month and state.<sup>35</sup> Using the “sort” functions available in Excel, True Wireless personnel manually sort the subscriber lists looking for situations in which, for example, two separately listed subscribers might have the same name and DOB; the same name and same last-4 digits of the SSN; the same name, same last-4 digits, and the same DOB; the same last name, address, and city; the same last name, address, and ZIP code; and other similar computer-assisted “manual” checks.<sup>36</sup> When used in combination with the “front-end” screens that prevent most potential duplicates from getting into the system in the first place, and because the same lists are subject to multiple sorts/reviews, True Wireless believes that these semi-manual reviews are effective at driving the incidence of subscribers receiving more than one subsidized service down to an irreducible minimum – well below one-tenth of 1%.

**Service Activation.** True Wireless does not and will not seek reimbursement for Lifeline service for any subscriber until the subscriber uses the service to either activate the service or to

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<sup>35</sup> True Wireless can perform these checks by virtue of its submission of spreadsheets containing its subscriber lists to USAC each month, along with its Form 497 filings. Having its subscriber lists in spreadsheet format facilitates these reviews. *See infra.*

<sup>36</sup> The specific set of reviews conducted each month has evolved over time as True Wireless has made efforts to continually improve its business practices, including improving its compliance with the Commission’s rules regarding consumer eligibility for Lifeline service. *See* 47 C.F.R. § 54.410(a) (“All [ETCs] must implement policies and procedures for ensuring that their Lifeline subscribers are eligible to receive Lifeline services.”)

complete an outgoing call.<sup>37</sup> Depending on the underlying wireless carrier utilized, True Wireless' subscribers activate their service in one of two ways. If the subscriber's service is provisioned on the network of one underlying carrier, the subscriber may activate the service by making an outbound call. If the subscriber's service is provisioned on the other underlying carrier's network, that subscriber's service may be activated by confirming through an IVR process that he or she wishes to activate the account by entering a number on the key pad. These subscribers are automatically routed to the IVR upon attempting to make a first outbound call. The method utilized is dictated by the particular underlying network to be utilized in the relevant geographic area. In addition, in Texas, the application is not processed until the applicant's name and address are confirmed as being eligible by the state Lifeline database, which is managed by Solix. Only after a Texas applicant's eligibility is confirmed by Solix is the handset provided or shipped out. Thereafter, the Texas subscriber is subject to the same outbound call/IVR process described above.

**Non-Usage Policy.** True Wireless de-enrolls subscribers who has not used his or her handset within 60 days is de-enrolled from the Lifeline program (after a 30-day notice period). Upon de-enrollment, True Wireless ceases seeking Lifeline reimbursements for that subscriber. True Wireless' non-usage policy ensures that only subscribers who actually utilize their wireless service continue to receive Lifeline-subsidized service, and that True Wireless only receives Lifeline support for those subscribers who remain enrolled in the program. True Wireless has continued this practice in strict conformance with the requirements of 47 C.F.R. § 54.407(c) and 54.405(e)(3).<sup>38</sup>

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<sup>37</sup> 47 C.F.R. § 54.407(c). True Wireless' Oklahoma subscribers make a monthly out-of-pocket payment for their service, and therefore, the service activation and usage requirements of 47 C.F.R. § 54.407(c) do not apply to True Wireless' Oklahoma operations.

<sup>38</sup> See *supra*, footnote 34.

Specifically, after 60 days of non-use,<sup>39</sup> True Wireless provides notice to the subscriber that failure to use the Lifeline service or provide other confirmation to True Wireless that the subscriber wishes to retain their Lifeline service within 30 days from the date of the de-enrollment notice will result in de-enrollment from the Lifeline program.<sup>40</sup> True Wireless does not request further Lifeline reimbursement for any de-enrolled customer and True Wireless will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>41</sup>

**One Per Household Rule.** True Wireless has implemented policies and practices in accordance with the Commission's rules and the *Lifeline Reform Order* to ensure that it provides only one Lifeline service per household. As described above, True Wireless has already implemented procedures to ensure that True Wireless itself only provides one Lifeline service per household. Now that the National Lifeline Accountability Database has become available, True Wireless will fully comply with the requirements of 47 C.F.R. § 54.404 and utilizes the database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant's residential address is receiving Lifeline service. Finally, if True Wireless has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, for example, due to a violation of the one-per-household rule, True Wireless initiates its termination process in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(1).

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<sup>39</sup> Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from True Wireless to add to the subscriber's plan; (3) answering an incoming call from a party other than True Wireless; or (4) responding to a direct contact from True Wireless confirming that the subscriber wants to continue receiving the service. 47 C.F.R. § 54.407(c)(2).

<sup>40</sup> 47 C.F.R. § 54.405(e)(3).

<sup>41</sup> *Id.*

**De-Enrollment and Disconnection.** True Wireless' subscribers may easily de-enroll from the Lifeline program or disconnect their service altogether. There is a link on the "plans" section of True Wireless' website ([www.gotruewireless.com](http://www.gotruewireless.com)) for de-enrollments and disconnections. This link permits subscribers to de-enroll from Lifeline and either subscribe to a non-Lifeline service or cancel their service altogether. Subscribers may also de-enroll or disconnect their service by calling True Wireless' customer service call center. In addition, True Wireless de-enrolls subscribers who either (a) do not use their service for 60 days, or (b) fail to pay any required monthly customer charges.

**Provision of Customer Lists and Subscriber Enrollment Forms.** In order to ensure that all of its customers have properly documented their enrollment as a True Wireless Lifeline customer and in order to facilitate both internal and USAC reviews of True Wireless' subscriber lists, since no later than July 2011, True Wireless has supplemented its Form 497 submissions to USAC with (a) an electronic copy of a spreadsheet containing the name, address, and other identifying information of each of its customers, and (b) an electronic copy of all of the enrollment forms for new customers that have signed up for service that month. The process of collecting and checking these items, and assembling them for submission to USAC, significantly enhances True Wireless' ability to ensure that it only provides subsidized service to, and only submits requests for reimbursement with respect to services provided to, actual, eligible customers. True Wireless commits to continue to assemble and submit these materials to USAC on a monthly basis until and unless directed to modify its practices in this regard by TAPD.

## VI. CONCLUSION

True Wireless submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*, the *Public Notice* and the Commission's rules pertaining to Lifeline. Accordingly, True Wireless respectfully requests approval of its pending ETC Petition and this Compliance Plan so that True Wireless may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC and may provide service to additional eligible low income consumers in the states covered by its pending ETC Petition.

Respectfully submitted,



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*Counsel to True Wireless, LLC*

May 19, 2014

**INDEX TO EXHIBITS**

<b>Exhibit</b>	<b>Description</b>
<b>1</b>	Short resumes of key personnel at True Wireless
<b>2</b>	Sample script for oral eligibility verification
<b>3</b>	Sample customer certification forms
<b>4</b>	Sample marketing materials
<b>5</b>	<b><u>CONFIDENTIAL</u></b> True Wireless response to NAL, dated January 10, 2014
<b>6</b>	<b><u>CONFIDENTIAL</u></b> April 1, 2013 Response of True Wireless to TAPD's February 15, 2013 Letter, with certain updated information
<b>7</b>	<b><u>CONFIDENTIAL</u></b> Composite Exhibit comprised of materials provided to USAC and TAPD in May, June and July 2011

# EXHIBIT 1

**Brian Cox:**

Mr. Cox is the 100% owner of True Wireless. Mr. Cox has more than a decade of experience in wireline and wireless telecommunications, including residential wireline service, business inside wiring installation and maintenance, and business-market sales roles for XO and Sprint/Nextel. Mr. Cox's role at True Wireless is essentially that of Chief Executive Officer. He decides on the overall direction of the company's operations and is involved in all major decisions regarding marketing strategy, vendor selection, personnel, etc.

**Mike Fina:**

As President and COO of True Wireless, LLC, Mike Fina works with the company's internal regulatory control team to ensure compliance with all state and federal regulations. Mr. Fina also helps maintain open communication between True Wireless and state Commissions. Mr. Fina also manages the True Wireless legal team, making certain the company responds to all regulatory inquiries regarding the company's operations.

**Chris Melton:**

Chris Melton is responsible for the implementation and maintenance of True Wireless's Lifeline Program compliance infrastructure. Mr. Melton also attends to any Lifeline-related matters, including the compilation and submission of Lifeline documents to USAC which correspond to True Wireless's monthly Lifeline filing requests. Mr. Melton ensures that customer information related to Lifeline compliance is accurate and up-to-date, both in the customer database and in internal storage. Mr. Melton is responsible for the accuracy and submission of company subsidy requests to USAC.

**Russell Dykes:**

Mr. Dykes is True Wireless' Director of Operations. His main responsibilities are interfacing with True Wireless' vendors, including: True Wireless' suppliers of wholesale wireless minutes; the vendor that supplies the "BeQuick" software platform that True Wireless uses to manage its customer records and accounts; True Wireless' suppliers of the refurbished handsets that True Wireless provides to its Lifeline subscribers; and the marketing companies that provide sales agents that True Wireless uses to sell its services.

**Candice Pair:**

Candice Pair manages the Quality Assurance Department of True Wireless, LLC and supervises the company's responses to any disputes, complaints, or escalations. These escalations include informal complaints from customers, as well as formal complaints from the FCC, PSCs, and the BBB. Mrs. Pair ensures that the customer service representatives, as well as other various departments, are following the procedures and tasks that are expected of them, that any customer issues or complaints are promptly addressed, and that the needs of the company, employees, and customers are met.

**Shannon Bing:**

Shannon Bing assists in implementing organizational policies, standards, and procedures to comply with applicable regulations. Mrs. Bing also delivers constant feedback to all relevant True Wireless decision-makers to keep all parties informed of regulatory changes. Mrs. Bing's responsibilities include maintaining all local, state, and federal taxes and other filings; filing all sales tax, other DOR reporting, SOS annual reports; filing all PSC monthly, quarterly, and annual reports; FCC filings such as Hearing Aid Compatibility, Form 477, CPNI reporting, USAC reports such as 499A and Q. Mrs. Bing also works with attorneys to comply with new FCC, USAC, and PSC rules when necessary.

**Drew Stavropoulos & Aliza Abidi:**

Attorneys Drew Stavropoulos (licensed in Tennessee & Texas) and Aliza Abidi (licensed in Tennessee) share responsibility for providing counsel to the True Wireless management in matters regarding, but not limited to, general business transactions, business contracts, employment contracts, reviewing and drafting legal documents, license agreements, insurance, company governance, intellectual property, litigation and resolution of disputes, as well as assisting the work and goals of contracted outside legal counsel.

# EXHIBIT 2

## Verbal Certification Script for True Wireless Call Center

1. Good afternoon Mr./Mrs. Let me confirm your information, and we will be done here and able to mail your phone out.
2. Would you kindly state your first and last name for our records?
3. Is the following information correct?
  - a. Your [permanent—state if applicable] physical address is \_\_\_\_\_.
    - i. [If address temporary, note in file]
    - ii. [If multiple “households” at same physical address **MUST** complete “Lifeline Household Worksheet.”
      1. Household = any individual or group of individuals who are living together at the same address as one economic unit.
      2. Economic unit = all adult individuals contributing to and/or sharing in the income and expenses of a household.
  - b. The last four digits of your social security number are \_\_\_\_\_.
  - c. Your date of birth is \_\_\_\_\_.
  - d. **IF PROGRAM-BASED**
    - i. The government assistance you are on is \_\_\_\_\_.
  - e. **IF INCOME BASED**
    - i. The number of persons in your household is \_\_\_\_ and your [annual or monthly—state one] income is \$\_\_\_\_\_.
4. Very Good. Now if you will confirm you qualify for Lifeline by answering yes or no to each of these statements under penalty of perjury:
  - a. **IF TRIBAL:** You certify that you live on Tribal land. [yes or no]
  - b. You are aware that Lifeline is a federal government assistance program, that you may not transfer your service to anyone, and only one Lifeline discount per household is allowed. If you currently receive Lifeline from another phone company, you will notify them that you are no longer qualify for their Lifeline service. [yes or no]
  - c. You are qualified to receive Lifeline and will notify True Wireless within 30 days if you no longer receive \_\_\_\_\_ government assistance or someone else in your household receives Lifeline. [yes or no]
  - d. You understand that if you move, you will need to provide us with your new address within 30 days. I understand that if I fail to do this I may be subject to penalties. [yes or no]
  - e. True Wireless will contact you once per year to verify that you remain eligible, and you understand that if you do not respond or are no longer eligible, you will lose your Lifeline benefits. [yes or no]

- f. You authorize True Wireless to verify your eligibility with, and release your personal information (such as name, qualifying program, income level) to entities and databases that manage the Lifeline program, including the Universal Service Administrative Company. **[yes or no]**
  - g. You understand that providing false information to receive Lifeline benefits can result in fines, imprisonment or denial of benefits, and certify that all the information you have provided is true and correct to the best of your knowledge. **[yes or no]**  
**[The applicant MUST say “yes” to EACH of the questions or the application MUST be denied.]**
5. Mr./Mrs. \_\_\_\_ Thank you and your order is now complete. Thank you for calling True Wireless and have a great day!

# EXHIBIT 3



90 mins. FREE (funded by Lifeline)

# Arkansas Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date		Contact Phone Number		Last 4 digits of Social Security Number	
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>		Apt:	City	State	Zip Code
		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code

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

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- Federal Public Housing Assistance (Section 8)
- Supplemental Security Income
- National School Lunch Program's free lunch program
- Supplemental Nutrition Assistance Program
- Temporary Assistance to Needy Families
- Medicaid
- Low-Income Home Energy Assistance Program

If you wish to qualify based on income, a different form is required.

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature \_\_\_\_\_ Date \_\_\_\_\_



90 mins. FREE (funded by Lifeline)

# Arkansas Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date		Contact Phone Number		Last 4 digits of Social Security Number	
Residential Address <small>(No P.O Boxes for res. Address)</small>		Apt:	City	State	Zip Code
This is my (check one):		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code

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

## Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>Last year's federal or state tax return</li> <li>Current income statement from an employer or paycheck stub</li> <li>A Social Security statement of benefits</li> <li>A retirement/pension statement of benefits</li> <li>An Unemployment/Workers' Compensation statement of benefit</li> <li>Federal notice letter of participation in General Assistance</li> <li>Divorce decree, child support award or other official document containing income information</li> </ul> <p>Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months</p>	Check or complete	Persons in Household	Annual Income	Monthly Income
		1	\$15,079	\$1,257
		2	\$20,425	\$1,702
		3	\$25,771	\$2,148
		4	\$31,117	\$2,593
		5	\$36,463	\$3,039
		6	\$41,809	\$3,484
		7	\$47,155	\$3,930
		8	\$52,501	\$5,375
	___ # in Household	For each add'l person, add:	\$5,346	\$445

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010

Customer Service: 877-412-1919

Fax: 1-855-254-4611

[www.gotruewireless.com](http://www.gotruewireless.com)



90 mins. FREE (funded by Lifeline)

# Maryland Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date		Contact Phone Number		Last 4 digits of Social Security Number	
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>		Apt:	City	State	Zip Code
		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code

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

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8) | <input type="checkbox"/> Supplemental Security Income           | <input type="checkbox"/> Temporary Disability Assistance Program (TDAP)     |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program     | <input type="checkbox"/> Temporary Assistance to Needy Families | <input type="checkbox"/> National School Lunch Program's free lunch program |
| <input type="checkbox"/> Medicaid                                      | <input type="checkbox"/> Medical Assistance (MA) Temporary      | <input type="checkbox"/> Maryland Energy Assistance Program (MEAP)          |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program     | <input type="checkbox"/> Cash Assistance (TCA)                  | <input type="checkbox"/> Electric Universal Service Program (EUSP)          |
|  | <input type="checkbox"/> Public Assistance to Adults            |   |

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www.getruewireless.com



90 mins. FREE (funded by Lifeline)

# Maryland Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

<b>Last Name</b>	<b>First Name</b>	<b>Middle Initial</b>
<b>Birth Date</b>	<b>Contact Phone Number</b>	<b>Last 4 digits of Social Security Number</b>
<b>Residential Address</b> (No P.O Boxes for res. Address) This is my (check one):	<b>Apt:</b> <input type="checkbox"/> Permanent Address	<b>City</b> <input type="checkbox"/> Temporary Address
	<b>State</b>	<b>Zip Code</b>
<b>Billing Address (if different)</b>	<b>Apt:</b>	<b>City</b>
	<b>State</b>	<b>Zip Code</b>

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

## Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>• Last year's federal or state tax return</li> <li>• Current income statement from an employer or paycheck stub</li> <li>• A Social Security statement of benefits</li> <li>• A retirement/pension statement of benefits</li> <li>• An Unemployment/Workers' Compensation statement of benefit</li> <li>• Federal notice letter of participation in General Assistance</li> <li>• Divorce decree, child support award or other official document containing income information</li> </ul> <p style="color: red; font-size: small;">Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months</p>	<b>Check or complete</b>	<b>Persons in Household</b>	<b>Annual Income</b>	<b>Monthly Income</b>
	<input type="checkbox"/>	1	\$15,079	\$1,257
	<input type="checkbox"/>	2	\$20,425	\$1,702
	<input type="checkbox"/>	3	\$25,771	\$2,148
	<input type="checkbox"/>	4	\$31,117	\$2,593
	<input type="checkbox"/>	5	\$36,463	\$3,039
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	<input type="checkbox"/>	7	\$47,155	\$3,930
	<input type="checkbox"/>	8	\$52,501	\$5,375
		—# in Household	For each add'l person, add:	\$5,346

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- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.
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- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature \_\_\_\_\_

Date \_\_\_\_\_

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010

Customer Service: 877-412-1919

Fax: 1-855-254-4611

[www.gotruewireless.com](http://www.gotruewireless.com)



1000 mins. \$1.00 (includes \$34.25 in Lifeline Funding)

Unlimited mins. \$6.75 (includes \$34.25 in Lifeline Funding)

# Oklahoma Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date	Contact Phone Number		Last 4 digits of Social Security # or Tribal ID		
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>		Apt:	City	State	Zip Code
		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code
I certify I live on Tribal land:		<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Multiple households sharing an address: <input type="checkbox"/> I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.					

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8)    | <input type="checkbox"/> Supplemental Security Income  | <input type="checkbox"/> Vocational Rehabilitation (including hearing impaired)       |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program        | <input type="checkbox"/> Temporary Assistance to Needy Families                                    | <input type="checkbox"/> National School Lunch Program's free lunch program           |
| <input type="checkbox"/> Medicaid   | <input type="checkbox"/> Head Start (only those households meeting its income qualifying standard) | <input type="checkbox"/> Tribally administered Temporary Assistance to Needy Families |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program        | <input type="checkbox"/> Oklahoma Sales Tax Relief   |   |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Bureau of Indian Affairs general assistance                               |   |

## Certification Under Penalty of Perjury

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Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010  
 Customer Service: 877-412-1919 Fax: 1-855-254-4611

[www.getruewireless.com](http://www.getruewireless.com)



1000 mins. \$1.00 (includes \$34.25 in Lifeline Funding)

Unlimited mins. \$6.75 (includes \$34.25 in Lifeline Funding)

# Oklahoma Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date		Contact Phone Number		Last 4 digits of Social Security # or Tribal ID	
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>		Apt:	City	State	Zip Code
		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code

I certify I live on Tribal land:  Yes  No

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

## Lifeline Application

I certify that my household income is at or below 135% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 135% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>Last year's federal or state tax return</li> <li>Current income statement from an employer or paycheck stub</li> <li>A Social Security statement of benefits</li> <li>A retirement/pension statement of benefits</li> <li>An Unemployment/Workers' Compensation statement of benefit</li> <li>Federal notice letter of participation in General Assistance</li> <li>Divorce decree, child support award or other official document containing income information</li> </ul> <p>Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months</p>	Check or complete	Persons in Household	Annual Income	Monthly Income
	<input type="checkbox"/>	1	\$15,079	\$1,257
	<input type="checkbox"/>	2	\$20,425	\$1,702
	<input type="checkbox"/>	3	\$25,771	\$2,148
	<input type="checkbox"/>	4	\$31,117	\$2,593
	<input type="checkbox"/>	5	\$36,463	\$3,039
	<input type="checkbox"/>	6	\$41,809	\$3,484
	<input type="checkbox"/>	7	\$47,155	\$3,930
	<input type="checkbox"/>	8	\$52,501	\$5,375
		<input type="checkbox"/> # in Household	For each add'l person, add:	\$5,346

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Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010  
Customer Service: 877-412-1919 Fax: 1-855-254-4611

[www.getruewireless.com](http://www.getruewireless.com)



90 mins. FREE (funded by Lifeline)

# Rhode Island Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name			First Name			Middle Initial		
Birth Date			Contact Phone Number			Last 4 digits of Social Security # or Tribal ID		

**Residential Address**  
 (No P.O Boxes for res. Address) This is my (check one):  Permanent Address  Temporary Address

Apt: \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

**Billing Address (if different)** Apt: \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

I certify I live on Tribal land:  Yes  No

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

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
**You must provide documentation demonstrating your current participation in the program checked below.**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8)    | <input type="checkbox"/> Supplemental Security Income  | <input type="checkbox"/> National School Lunch Program's free lunch program            |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program        | <input type="checkbox"/> Temporary Assistance to Needy Families Program                            | <input type="checkbox"/> Rhode Island Medical Assistance Program                       |
| <input type="checkbox"/> Medicaid   | <input type="checkbox"/> Family Independence Program   | <input type="checkbox"/> Rhode Island Pharmaceutical Assistance to the Elderly         |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program        | <input type="checkbox"/> General Public Assistance   | <input type="checkbox"/> Bureau of Indian Affairs General Assistance                   |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations | <input type="checkbox"/> Head Start (only those households meeting its income qualifying standard) | <input type="checkbox"/> Tribally administered Temporary Assistance for Needy Families |

If you wish to qualify based on income, a different form is required.

## Certification Under Penalty of Perjury

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Customer Service: 877-412-1919

Fax: 1-855-254-4611

www.gotruewireless.com



90 mins. FREE (funded by Lifeline)

# Rhode Island Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name First Name Middle Initial

Birth Date Contact Phone Number Last 4 digits of Social Security # or Tribal ID

Residential Address (No P.O. Boxes for res. Address) This is my (check one):  Permanent Address  Temporary Address Apt: City State Zip Code

Billing Address (if different) Apt: City State Zip Code I certify I live on Tribal land:  Yes  No

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	___# in Household	For each add'l person, add:	\$5,346	\$445

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

- I acknowledge that Lifeline is a federal government benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- I acknowledge that only one Lifeline service is available per household, and that, to the best of my knowledge, no other person in my household is receiving a Lifeline service. (For purposes of Lifeline, a "household" is any individual or group of individuals who live together at the same address and share income and expenses.)
- I acknowledge that a household is not permitted to receive Lifeline benefits from multiple providers and that violation of this limitation constitutes a violation of the rules of the Federal Communications Commission and will result in de-enrollment from the Lifeline program. If I am participating in another Lifeline program at the time I apply for True Wireless Lifeline service, I agree to cancel that Lifeline service with any other provider.
- I acknowledge that Lifeline is non-transferable and that I may not transfer my benefit to any other person.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I will notify True Wireless within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline services, such as no longer participating in any of qualifying program, or if I or a member of my household receives another Lifeline benefit. I understand that if I fail to do this I may be subject to penalties.
- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
- I authorize True Wireless to access any records required to verify my statements on this form and to confirm my eligibility under the Lifeline program. I also authorize True Wireless to release any records required for the administration of the Lifeline program (for example, name, telephone number, address, qualifying program or income level), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline program. Failure to consent will result in a denial of service.
- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature Date



90 Min. FREE (funded by Lifeline)

# Texas Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial
Birth Date	Contact Phone Number		Last 4 digits of Social Security # or Tribal ID	
Residential Address (No P.O Boxes for res. Address) This is my (check one): <input type="checkbox"/> Permanent Address <input type="checkbox"/> Temporary Address				
Billing Address (if different)		Apt:	City	State Zip Code
I certify I live on Tribal land: <input type="checkbox"/> Yes <input type="checkbox"/> No				
Multiple households sharing an address: <input type="checkbox"/> I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate Lifeline Household Worksheet.				

## Lifeline Application

I certify that I participate in one of the following programs (check one):  
You must provide documentation demonstrating your current participation in the program checked below.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8) | <input type="checkbox"/> Supplemental Security Income           | <input type="checkbox"/> CHIP   |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program     | <input type="checkbox"/> Temporary Assistance to Needy Families | <input type="checkbox"/> National School Lunch Program's free lunch program |
| <input type="checkbox"/> Medicaid                                      | <input type="checkbox"/> Low income Housing Assistance Program  |   |

## Certification Under Penalty of Perjury

I certify under penalty of perjury that (check or initial):

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- I acknowledge that I may be required to re-certify to my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment and termination of my Lifeline benefits.
- If I move to a new address, I will provide the new address to True Wireless within 30 days.
- If I provided a temporary address, I will be required to verify my temporary address every 90 days. If I do not provide verification within 30 days, I will be de-enrolled from the Lifeline program.
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- I certify that the information contained in this certification is true and correct to the best of my knowledge.

Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010  
Customer Service: 877-412-1919 Fax: 1-855-254-4611

www.gotruewireless.com



90 Min. FREE (Funded by Lifeline)

# Texas Lifeline Application Form

Customer Account Number

Today's Date:

## Fill Out Your Information

Last Name		First Name		Middle Initial	
Birth Date		Contact Phone Number		Last 4 digits of Social Security # or Tribal ID	
Residential Address <small>(No P.O Boxes for res. Address) This is my (check one):</small>		Apt:	City	State	Zip Code
		<input type="checkbox"/> Permanent Address	<input type="checkbox"/> Temporary Address		
Billing Address (if different)		Apt:	City	State	Zip Code

I certify I live on Tribal land:  Yes  No

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

## Lifeline Application

I certify that my household income is at or below 150% of the Federal Poverty Guidelines as indicated below:

<p>Eligibility for Lifeline may apply if your household income is at or below 150% of the Federal Poverty Guidelines for a household of that size. Indicate which income range applies to you in the chart. You must provide proof of eligibility based on income, which can include:</p> <ul style="list-style-type: none"> <li>Last year's federal or state tax return</li> <li>Current income statement from an employer or paycheck stub</li> <li>A Social Security statement of benefits</li> <li>A retirement/pension statement of benefits</li> <li>An Unemployment/Workers' Compensation statement of benefit</li> <li>Federal notice letter of participation in General Assistance</li> <li>Divorce decree, child support award or other official document containing income information</li> </ul> <p><b>Documents must cover a full year or 3 consecutive months' worth of the same types of document within the previous 12 months</b></p>	Check or complete	Persons in Household	Annual Income	Monthly Income
		1	\$16,755	\$1,397
		2	\$22,695	\$1,892
		3	\$28,635	\$2,387
		4	\$34,575	\$2,882
		5	\$40,515	\$3,377
		6	\$46,455	\$3,872
		7	\$52,395	\$4,367
		8	\$58,335	\$4,862
		___ # in Household	For each add'l person, add:	\$5,730

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Applicant's Signature

Date

Please mail: True Wireless Lifeline Processing Center, PO Box 9040, Toledo, OH 43682-4010  
Customer Service: 877-412-1919

Fax: 1-855-254-4611

www.gotruewireless.com

# EXHIBIT 4

# COME IN OUT OF THE COLD

**Visit One of Our Store Locations Today**

4926 NW 23rd Street 1514 N. Rockwell 1715 N. Portland Ave 2737 NW 10th Street  
OKC, OK 73127 OKC, OK 73127 OKC, OK 73107 OKC, OK 73127  
(405) 896-4018 (405) 603-5989 (405) 605-8206 (405) 948-2030

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4723 NE 29th Street

**\$1.00**  
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Providing the Best Phones and Service in the Metro  
**Data Plans 911 Access**  
**Voicemail Wifi Enabled**  
**Wireless Accessories**

\* Must meet government eligibility guidelines. Additional charges and taxes may apply.



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(405) 605-8206

**[GOTRUEWIRELESS.COM](http://GOTRUEWIRELESS.COM)**

Discounted cell phone service is possible due to the Lifeline Program and service is provided by True Wireless. Phone is free due to company promotions and its cost is not covered by the Lifeline program. Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program and the program is limited to one discount per household.

Terms and Conditions apply.

**CONFIDENTIAL EXHIBIT 5**

**CONFIDENTIAL EXHIBIT 6**

**CONFIDENTIAL EXHIBIT 7**