mobi pcs

Pacific Guardian Center
Makai Tower
733 Bishop Street
Suite 1200
Honolulu, HI 96813
www.mobipcs.com

RECACTED – FOR PUBLIC INSPECTION

June 30, 2014

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: FCC Form 481 – Carrier Annual Report for Program Year 2015

WC Docket No. 10-90

Dear Secretary Dortch:

On behalf of Coral Wireless LLC, d/b/a MobiPCS ("Mobi"), Study Area Code (SAC) 629002, please find attached a public version of Mobi's FCC Form 481 Carrier Annual Report, filed pursuant to Sections 54.313 and 54.422 of the Commission's Rules ("Form 481 Report").

This filing was electronically submitted to the Universal Service Administrative Company and is being filed with the FCC per instructions for filing Form 481.

Copies of this filing have also been provided to the Hawaii Public Utilities Commission, the Hawaii Division of Consumer Advocacy, the Department of Hawaiian Home Lands, and the Office of Hawaiian Affairs.

Mobi is also submitting to the Commission, under separate cover, a confidential version of the Form 481 Report. The confidential version is marked "**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**." For each report with a corresponding confidential version, the attached Form 481 Report has been marked "**REDACTED – FOR PUBLIC INSPECTION**."

Please contact the undersigned at (808) 723-2072 if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,

Peter Gose

Peter Gose
Director Regulatory Affairs

Attachment

FCC Form 481 - Carrier Annual Reporting Data Collection Form

REDACTED - FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Peter Gose
<035>	Contact Telephone Number: Number of the person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	peter.gose@mobipcs.com

ANNUAL REPORTING FOR ALL CARRIERS

(check box when complete)

			54.313 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	✓	
<200>	Outage Reporting (voice)	(complete attached worksheet)	✓	✓
<210>	✓ <-- check box if no outages to report		✓	
<300>	Unfulfilled Service Requests (voice)			
<310>	Detail on Attempts (voice)	(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)		✓	
<330>	Detail on Attempts (broadband)	(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed		✓	✓
<420>	Mobile			
<430>	Number of Complaints per 1,000 customers (broadband)		✓	
<440>	Fixed			
<450>	Mobile			
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	✓	✓
<510>	629002HI510 - 2015PY.pdf	(attached descriptive document)	✓	✓
<600>	Functionality in Emergency Situations	(check to indicate certification)	✓	✓
<610>	629002HI610 - 2015PY.pdf	(attached descriptive document)	✓	✓
<700>	Company Price Offerings (voice)	(complete attached worksheet)	✓	
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	✓	
<800>	Operating Companies and Affiliates	(complete attached worksheet)	✓	✓
<900>	Tribal Land Offerings (Y/N)? ◉ ○	(if yes, complete attached worksheet)	✓	
<1000>	Voice Services Rate Comparability	(check to indicate certification)	✓	
<1010>		(attach descriptive document)	✓	
<1100>	Terrestrial Backhaul (Y/N)? ◉ ○	(if not, check to indicate certification)	✓	
<1110>		(complete attached worksheet)	✓	
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)		✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>		(check to indicate certification)		
<2005>		(complete attached worksheet)		

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)		
<3005>		(complete attached worksheet)		

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no) ○ ●
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) ○ ○

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

629002HI112 - 2015 PY.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	✓
<114>	Report how much universal service (USF) support was received	✓
<115>	How (USF) was used to improve service quality	✓
<116>	How (USF)was used to improve service coverage	✓
<117>	How (USF) was used to improve service capacity	✓
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	✓

REDACTED - FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2015
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures

REDACTED - FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	35.0

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**

-- See attached worksheet --

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	**Total Rate and Fees**	**Broadband Service - Download Speed (Mbps)**	**Broadband Service - Upload Speed (Mbps)**	**Usage Allowance (GB)**	**Usage Allowance Action Taken When Limit Reached {*select*}**
			-- See attached worksheet --					

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<810>	Reporting Carrier	Coral Wireless DBA Mobi PCS
<811>	Holding Company	Coral Wireless Holding LLC
<812>	Operating Company	Corall Wireless DBA Mobi PCS

<813>	<a1>	<a2>	<a3>
	Affiliates	**SAC**	**Doing Business As Company or Brand Designation**

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
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<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<910> Tribal Land(s) on which ETC Serves

Hawaiian Home Lands

<920> Tribal Government Engagement Obligation

629002HI920 - 2015PY.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

		Select (Yes,No, NA)
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Yes
<922>	Feasibility and sustainability planning;	Yes
<923>	Marketing services in a culturally sensitive manner;	Yes
<924>	Compliance with Rights of way processes	Yes
<925>	Compliance with Land Use permitting requirements	Yes
<926>	Compliance with Facilities Siting rules	Yes
<927>	Compliance with Environmental Review processes	Yes
<928>	Compliance with Cultural Preservation review processes	Yes
<929>	Compliance with Tribal Business and Licensing requirements.	NA

(1100) No Terrestrial Backhaul Reporting Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
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<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website HTTP http://mobipcs.com/services/lifeline

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ✓

<1222> Details on the number of minutes provided as part of the plan, ✓

<1223> Additional charges for toll calls, and rates for each such plan. ✓

(2000) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
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<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}

<2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012> 2013 Frozen Support Certification

<2013> 2014 Frozen Support Certification

<2014> 2015 Frozen Support Certification

<2015> 2016 and future Frozen Support Certification

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017> 3rd year Broadband Service Certification

<2018> 5th year Broadband Service Certification

<2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

REDACTED - FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
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<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification {47 CFR § 54.313(f)(1)(i)}

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} (Yes/No)

(3014) If yes, does your company file the RUS annual report (Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited? (Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2015
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<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: CORAL WIRELESS DBA MOBI PCS

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/27/2014

Printed name of Authorized Officer: Mark Woelfel

Title or position of Authorized Officer: Cheif Financial Officer

Telephone number of Authorized Officer: 8087232067 ext.

Study Area Code of Reporting Carrier: 629002 Filing Due Date for this form: 07/01/2014

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
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<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier

I certify that (Name of Agent)_____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.

Name of Authorized Agent:

Name of Reporting Carrier:

Signature of Authorized Officer: Date:

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier: Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier

I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.

Name of Reporting Carrier:

Name of Authorized Agent or Employee of Agent:

Signature of Authorized Agent or Employee of Agent: Date:

Printed name of Authorized Agent or Employee of Agent:

Title or position of Authorized Agent or Employee of Agent

Telephone number of Authorized Agent or Employee of Agent:

Study Area Code of Reporting Carrier: Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

REDACTED - FOR PUBLIC INSPECTION

Attachments

REDACTED - FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	35.0

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	**Exchange (ILEC)**	**SAC (CETC)**	**Rate Type**	**Residential Local Service Rate**	**State Subscriber Line Charge**	**State Universal Service Fee**	**Mandatory Extended Area Service Charge**	**Total per line Rates and Fees**
HI	State Wide		FR	35.0	0.0	0.0	0.0	35.0

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
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<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<711>

<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
State	**Exchange (ILEC)**	**Residential Rate**	**State Regulated Fees**	Total Rates and Fees	**Broadband Service - Download Speed (Mbps)**	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
HI	NA	0.0	0.0	0.0	0.0	0.0	0.0	Other, CETC exempt from BB reporting

REDACTED - FOR PUBLIC INSPECTION

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of	)	
	)	
CORAL WIRELESS, LLC d/b/a MOBI PCS	)	**WC Docket No. 10-90**
	)	
To be Designated by the Commission as an	)	
Eligible Telecommunications Carrier	)	

PROGRAM YEAR 2015 ANNUAL DATA COLLECTION

REPORT OF CORAL WIRELESS, LLC d/b/a MOBI PCS

DULY DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER BY THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

CONFIDENTIAL TREATMENT IS TO BE ACCORDED PROPRIETARY SECTIONS OF THIS REPORT

I. INTRODUCTION

Coral Wireless, LLC d/b/a Mobi PCS (hereinafter "Mobi PCS" or "Mobi") submits this Five-Year Service Quality Improvement Plan in WC Docket No. 10-90 in fulfillment of FCC rules. As an eligible telecommunications carrier ("ETC") certified by the Public Utilities Commission of the State of Hawaii ("HPUC") Mobi submits service quality improvement plans to the HPUC. Those plans focus of the past and current year and also included a forecast of one year forward. Mobi hereby provides its second annual service quality improvement plan document in a five-year format with the recognition that in 2016 all high cost support will entirely be phased out for Mobi. This submission includes maps explaining Mobi's progress on service expansion, the amount of universal service support received, and how the support was used to improve service quality, coverage, or capacity, and an explanation regarding network improvement targets that were realigned in the prior calendar year.

II. BACKGROUND AND REQUIRED INFORMATION

ETCs receiving high-cost support for voice telephony service and offering broadband as a condition of such support, must file with the Commission, relevant state commission, or Tribal government, as appropriate, a five-year build-out plan that accounts for the new broadband obligations adopted in the *USF/ICC Transformation Order*, in a manner consistent with section 54.202(a)(1)(ii). Section 54.313(a)(1) requires such ETCs to file annual progress reports on their five-year build-out plans in subsequent years. Competitive ETCs such as Mobi whose support is being phased down are not necessarily required to submit a new five-year build-out plan but must continue to submit information or certifications with respect to their provision of voice service, including filing progress reports on any previously filed five-year build-out plans. This annual update includes maps explaining Mobi's progress towards service expansion, the amount of universal service support received, how the support was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that were not fulfilled but realigned in the prior calendar year. To the extent possible the information is submitted at the wire center level. In instances where improvements benefit the entire state, a system wide designation is set forth.

III. SERVICE QUALITY IMPROVEMENT PLAN

The projects described in this service quality improvement plan have been selected on the basis of current Universal Service Fund reforms, consumer demand, projected customer growth and consumer feedback respecting network coverage areas. Changes to the structure or operation of the Universal Service Fund have substantial bearing on Mobi's planned service improvements. On November 18, 2011, the Federal Communications Commission released its Report & Order & Further Notice of Proposed Rulemaking outlining its universal service reforms. *In re Connect America* Fund, WC Docket No. 10-90, Report & Order & FNRPM, FCC 11-161 (rel. Nov. 18, 2011) ("*FUSF Order*"). Among other things, the *FUSF Order* imposed a host of changes to the calculation of High Cost Program support for CETCs. The FCC further clarified in a subsequent February 2012 Order CETCs that USF support for CETCs would be determined on an incumbent local exchange carrier study area basis. As a result of the FUSF Order and the subsequent Clarification Order, a substantial reduction in available USF support for all CETCs in Hawaii has already been implemented. The amount of support received or anticipated to be received by Mobi and the eligible expenditures from 2012 until the phase out of the legacy High Cost Support program in 2016 appear in the table below:

BEGIN CONFIDENTIAL

[redacted]

[redacted] [End Confidential].

With few exceptions, in some fashion all USF related projects utilized competitive bidding in 2013. Even in instances where Mobi is tied to a single vendor based on past

technology selections, Mobi has contacted other vendors for price quotations. It is Mobi policy, whenever practical, to obtain a minimum of three (3) competitive bids for every capital and operational expenditure. There are instances where augmentations to existing legacy network equipment, software systems, or vendors who possess a unique or specific skill set, require that Mobi utilize the original vendors services or equipment. In such instances Mobi speaks with other vendors to get a general sense of prevailing market prices and utilizes that information in negotiations with entrenched vendors. Additionally Mobi has eligible USF expenditures it must make with monopoly or sole source providers such as electric power utilities, wherein competitive bidding is not possible. Mobi does not conduct business with any vendor who is an affiliate of Mobi or a relation to any Mobi officer.

[redacted]

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[redacted]

[redacted] [End Confidential].

2015 PROGRAM YEAR: ANNUAL DATA COLLECTION: FIVE-YEAR PLAN
CORAL WIRELESS LLC 2012 USF SUPPORT EXPENDITURES

HIGHLY CONFIDENTIAL

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2015 PROGRAM YEAR: ANNUAL DATA COLLECTION: FIVE-YEAR PLAN **HIGHLY CONFIDENTIAL**

CORAL WIRELESS LLC 2013 ESTIMATED USF SUPPORT EXPENDITURES FOR FIVE-YEAR PLANNING

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2015 PROGRAM YEAR: ANNUAL DATA COLLECTION: FIVE-YEAR PLAN **HIGHLY CONFIDENTIAL**

CORAL WIRELESS LLC 2014 ESTIMATED USF SUPPORT EXPENDITURES FOR FIVE-YEAR PLANNING

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2015 PROGRAM YEAR: ANNUAL DATA COLLECTION: FIVE-YEAR PLAN **HIGHLY CONFIDENTIAL**

CORAL WIRELESS LLC 2015 ESTIMATED USF SUPPORT EXPENDITURES FOR FIVE-YEAR PLANNING

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2015 PROGRAM YEAR: ANNUAL DATA COLLECTION: FIVE-YEAR PLAN **HIGHLY CONFIDENTIAL**

CORAL WIRELESS LLC 2016 ESTIMATED USF SUPPORT EXPENDITURES FOR FIVE-YEAR PLANNING

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2015 Program Year Report of Coral Wireless, LLC d/b/a Mobi PCS
CONFIDENTIAL ATTACHMENT B

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of	)	
	)	
CORAL WIRELESS, LLC d/b/a MOBI PCS	)	**WC Docket No. 10-90**
	)	
To be Designated by the Commission as an	)	
Eligible Telecommunications Carrier	)	

PROGRAM YEAR 2015 ANNUAL DATA COLLECTION

REPORT OF CORAL WIRELESS, LLC d/b/a MOBI PCS

DULY DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER BY THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

CONFIDENTIAL TREATMENT IS TO BE ACCORDED PROPRIETARY SECTIONS OF THIS REPORT

Coral Wireless, LLC d/b/a Mobi PCS (hereinafter “Mobi PCS” or “Mobi”) adheres to the CTIA Code for Wireless service to ensure high levels of service quality and consumer protection. Specifically Mobi PCS at all times will [1] Disclose rates and terms of service to consumers; [2] Make available maps showing where service is generally available; [3] Provide contract terms to customers and confirm changes in service; [4] Allow a trial period for new service; [5] Provide specific disclosures in advertising; [6] Separately identify carrier charges from taxes on billing statements; [7] Provide customers the right to terminate service for changes to contract terms; [8] Provide ready access to customer service; [9] Promptly respond to consumer inquiries and complaints received from government agencies; [10] Abide by policies for protection of customer privacy; [11] Provide consumers with free notifications for voice, data and messaging usage, and international roaming; [12] Abide by CTIA standards regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets that are locked by or at the direction of the carrier.

REDACTED - FOR PUBLIC INSPECTION

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of	)	
	)	
CORAL WIRELESS, LLC d/b/a MOBI PCS	)	**WC Docket No. 10-90**
	)	
To be Designated by the Commission as an	)	
Eligible Telecommunications Carrier	)	

PROGRAM YEAR 2015 ANNUAL DATA COLLECTION

REPORT OF CORAL WIRELESS, LLC d/b/a MOBI PCS

DULY DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER BY THE PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

EMERGENCY FUNCTIONALITY

CONFIDENTIAL TREATMENT IS TO BE ACCORDED PROPRIETARY SECTIONS OF THIS REPORT

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REPORT ON 2013 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE OFFICE OF HAWAIIAN AFFAIRS

INTRODUCTION

Pursuant to required obligations for Tribal engagement as set forth in the USF Transformation Order[1], Coral Wireless, LLC d/b/a Mobi PCS ("Mobi") and the Office of Hawaiian Affairs ("OHA") held the 2013 annual engagement meeting on Tuesday, February 18, 2014, at the OHA headquarters office at 560 N. Nimitz Highway in Honolulu, Hawaii. As a framework to guide the engagement meeting, Mobi and OHA generally followed the Federal Communications Commission ("FCC") Office of Native Affairs and Policy ("ONAP") Further Guidance document for tribal government engagement. The ONAP Further Guidance document wisely recommends best practices for recordkeeping[2] and as such Mobi and OHA have agreed to memorialize the event sequence leading up to the engagement meeting and the key topics discussed during the engagement meeting. From time to time this recordkeeping document will be appended to as Mobi and OHA exchange reports, information, and ideas.

EVENT SEQUENCE

Mobi immediately corresponded with OHA to begin the process. The event sequence follows:

November 18, 2013	Mobi dispatched via U.S. Mail an invitation to OHA proposing engagement meetings in early December 2013.
December 3, 2013	OHA requested a postponement of the meetings given its move from the former headquarters office to its new location.
February 11, 2014	Mobi followed up by e-mail requesting the establishment of a meeting date. A new date was set.
February 18, 2014	Meeting held at OHA headquarters in Honolulu from 3:00 p.m. – 4:15 p.m.

MEETING SUMMARY

Mobi PCS was represented by Philip Risken, Peter Gose and Jeff Napoleon. OHA was represented by Kai Markell and Jerry Norris. Introductions were made and Mobi described goals for the engagement meeting. Mobi noted that the engagement meeting in March 2013 was very beneficial. Both Mobi and the OHA expressed belief that the engagement meeting would be mutually beneficial.

Mobi prepared and presented a PowerPoint presentation.

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[1] *See Connect America Fund,* WC Docket No. 10-90 *et al.,* Report and Order and Further Notice of Proposed Rulemaking, 26 FCC 17663 at 17868-69, para. 637 (2011) (*USF/ICC Transformation Order*);

[2] Tribal Nations also should immediately begin preparations to receive, record, and process this engagement dialogue and any related correspondence. Specific efforts should be made to chronicle details of engagement dialogue sessions. Recordkeeping should be established for documentation of the initial contact, any follow-up communications, and the resulting annual certification documentation. Records should include, for example, a summary of all verbal interactions as well as copies of all electronic and hard copy communications. Paragraph 13.

REPORT ON 2013 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE OFFICE OF HAWAIIAN AFFAIRS

MEETING SUMMARY - continued

Prior to the meeting Peter Gose circulated copies of a presentation and the ONAP Further Guidance document to the OHA participants. Mobi noted that its presentation followed the general constructs of the Further Guidance document.

Mobi described how the engagement meeting process has been integrated into the annual reporting process for ETCs. Mobi gave a history of the evolution of the Universal Service Fund ("USF").

Mobi stressed its desire to work with the OHA in the future as network expansion needs arise. OHA mentioned that future partnerships may be possible given new land holdings under control of OHA and potential changes possible under changes to DHHL funding mechanisms.

Mobi presented information about the company and the services Mobi provides.

Mobi discussed its rate plan structures, features, and pricing, including Lifeline and Po'okela programs.

Mobi and OHA discussed communications goals, needs and priorities.

Mobi discussed its prioritization process and focused on both current and future service deployments.

Mobi and OHA discussed planning for feasibility and sustainability of communications services for HHL communities.

Mobi and OHA discussed Mobi's marketing to HHL residents.

Mobi and OHA discussed rights of way and permitting issues as they might relate to Mobi's placement of infrastructure.

Mobi discussed its business licensing requirements from a federal, state, regulatory, and local perspective.

Mobi asked the OHA staff how Mobi can assist with HHL community needs from the perspective of anchor institutions, economic development, education, health care and public safety

OHA reiterated an interest in the expansion of Mobi's Po'okela program to native Hawaiians who are on the waiting list. Mobi committed to share that request with its senior leadership.

OHA shared its 2010-2018 strategic plan document with Mobi.

Mobi discussed and expressed concerns respecting correspondence from OHA CEO Dr. Crabbe to the Hawaii Public Utility Commission. Mobi requested that OHA and Mobi open future dialogs respecting concerns over Tribal Engagement obligations and other regulatory requirements.

A follow up meeting with OHA was held on March 28, 2014 and attended by Jerry Norris and Kai Markel of OHA and Melvin Sakurai, Marcel Bekers, Erica Villanueva, and Peter Gose of Mobi. Topics of discussion were alternative methods for outreach to native Hawaiian communities and expansion of Mobi programs to a wider native Hawaiian reach.

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REPORT ON 2013 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE DEPARMENT OF HAWAIIAN HOME LANDS

On November 18, 2013, Mobi PCS through its Director of Regulatory Affairs Peter Gose corresponded with the Department of Hawaiian Home Lands ("DHHL") proposing a range of times for a tribal engagement meeting in early December 2013 for the purpose of holding the annual tribal engagement meeting as required by the Federal Communications Commission ("FCC"). In late November 2013 Linda Chinn of the Department of Hawaiian Home Lands ("DHHL") contacted Mr. Gose to indicate that the proposed dates in December were not workable for the DHHL staff and that she would respond back and propose alternate times for the meeting. After that time no contact from anyone at the DHHL was received by Mobi.

On February 11, 2014, Mr. Gose sent e-mail to Ms. Chinn again requesting a meeting. Again on March 10, 2014 Mr. Gose corresponded by e-mail to Ms. Chinn requesting a meeting. Out of an abundance of caution Mr. Gose also copied Blaine Ferge of the DHHL staff on his March 10, 2014 message in the event Ms. Chinn's e-mail was not operational.

On June 3, 2014, Phillip Risken, Vice President of Engineering for Mobi PCS telephoned and dispatched correspondence to the DHHL in a final effort to establish a time for the annual tribal engagement meeting. To date no response has been received from the DHHL.

Mobi PCS experienced difficulties in setting up its initial meeting with the DHHL in 2012. During initial efforts Mobi PCS consulted the FCC's Office of Native Affairs and Policy {"ONAP") and was instructed to document all attempts to schedule and hold the tribal engagement meeting. The ONAP staff conveyed to Mobi that after numerous attempts to schedule and hold the annual engagement meeting and after receiving no cooperation from a tribal authority, Mobi's obligation to engage with the tribal authority would be considered fulfilled.

Mobi PCS motes that for the current reporting period it met not once, but twice with the other tribal authority in Hawaii, that being the Office of Hawaiian Affairs.