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August 15, 2016

VIA OVERNIGHT DELIVERY

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
(850) 413-6770

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2016 AUG 16 AM 9:32
COMMISSION
CLERK

Re: 2016 Annual Lifeline Data Request (i-wireless, LLC)
CONFIDENTIAL TREATMENT REQUESTED

To Whom It May Concern:

i-wireless, LLC (herein "i-wireless") hereby files an original and two (2) copies of its responses to the 2016 Annual Lifeline Data Request.

i-wireless hereby requests confidential treatment of certain information identified herein (Exhibits A, B and C, and Response to No. 12) pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. I have enclosed one original copy and two edited copies in which the information claimed as confidential is blacked out.

If you have any questions or need additional information, please do not hesitate to contact me at 770-232-9200 or hkirby@telecomcounsel.com. Thank you for your attention to this matter.

Sincerely,

Heather Kirby

Heather Kirby, Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys for i-wireless, LLC

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CLEC AND WIRELESS LIFELINE DATA REQUEST 2016

To assist the Public Service Commission (PSC) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 15, 2016. Your response should include your company name, contact person, and email address.**

For items 1 through 16, please provide the data for the fiscal year July 1, 2015, through June 30, 2016.

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.
Response: See Confidential Exhibit A

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or customers provided Lifeline through resold Lifeline access lines.
Response: See Confidential Exhibit A

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.
Response: \$9.25 federal Lifeline subsidy per customer per month.

4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).
Response: See Confidential Exhibit A

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or customers provided Lifeline through resold Lifeline access lines.
Response: See Confidential Exhibit A

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold Lifeline access lines, or Lifeline customers moved to Transitional Lifeline.
Response: See Confidential Exhibit A

7. The number of customers participating in Transitional Lifeline each month.
Response: See Confidential Exhibit A

8. The number of customers participating in Lifeline under the Tribal Lands provision each month.

Response: See Confidential Exhibit A

9. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

Response: None, i-wireless does not resale access lines to other carriers.

10. Description of your company's procedures for enrolling customers in the Lifeline program. Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.
- b. Procedures used to process applications received directly from customers.
- c. Procedures used to process applications received through the PSC on-line process.
- d. Procedures used to process applications received through the Department of Children and Families coordinated enrollment process.
- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

Response:

- (a) Applications are transferred on a daily basis from the Office of Public Counsel into the CGM Enrollment Compliance Platform (ECP) application. The company's internal Review Team verifies the accuracy and consistency of the proof of documentation, including proof of eligibility and proof of valid identification for every application received. The enrollment platform automatically conducts internal and external (NLAD) system validation checks prior to proceeding with enrollment. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application.
- (b) Applications received directly from a potential customer requesting Lifeline service are immediately provided to the internal Review Team. Upon receipt, the Review Team will enter the customer's demographic information into the CGM ECP application. After completing the internal and external (NLAD) system validation checks, the Review Team will verify the accuracy and consistency of the proof of documentation, including proof of eligibility and proof of valid identification included with the applicant's materials. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application.
- (c) Applications are received into the enrollment platform on a daily basis from the PSC-online process. After the applications have been received in the enrollment platform, the enrollment platform will perform internal and external (NLAD) system checks. Based on the results of the system checks then the customer will be either be automatically approved or denied.

- (d) Applications are transferred on a daily basis from the Department of Children and Family Services into the CGM Enrollment Compliance Platform (ECP) application. The company's internal Review Team verifies the accuracy and consistency of the proof of documentation, including proof of eligibility and proof of valid identification for every application received. The enrollment platform automatically conducts internal and external (NLAD) system validation checks prior to proceeding with enrollment. Based on the results of the documentation and system checks, the Review Team will either approve or deny the application.
- (e) All applications are reviewed in real time by the Review Team. A customer's Lifeline benefit will automatically be credited to their account upon successful activation and use of the handset.
11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:
- a. Time period between initial certification and annual certification.
 - b. Method(s) used to verify customer eligibility.

Response:

- (a) Per the requirements of §54.416, i-wireless mandates that all Lifeline end-users to recertify their eligibility annually. Recertification begins the year after the customer initially enrolled in the Lifeline Program and continues on an annual basis while the customer is actively enrolled in the Lifeline Program.
- (b) i-wireless customers may complete the recertification process directly from the handset via the WAP (Wireless Application Protocol) deck, by calling an automated Interactive Voice Response (IVR) system, by speaking with a Customer Care agent, by logging into their account on the company's website or by submitting a completed recertification form via US mail.
12. Description of your company's procedures for Lifeline. Include the following in your response:
- a. Internal procedures for promoting Lifeline.
 - b. Outreach and educational efforts involving participation in community events.
 - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
 - d. Copies of Lifeline outreach materials of your company.
 - e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

(12) Response: CONFIDENTIAL

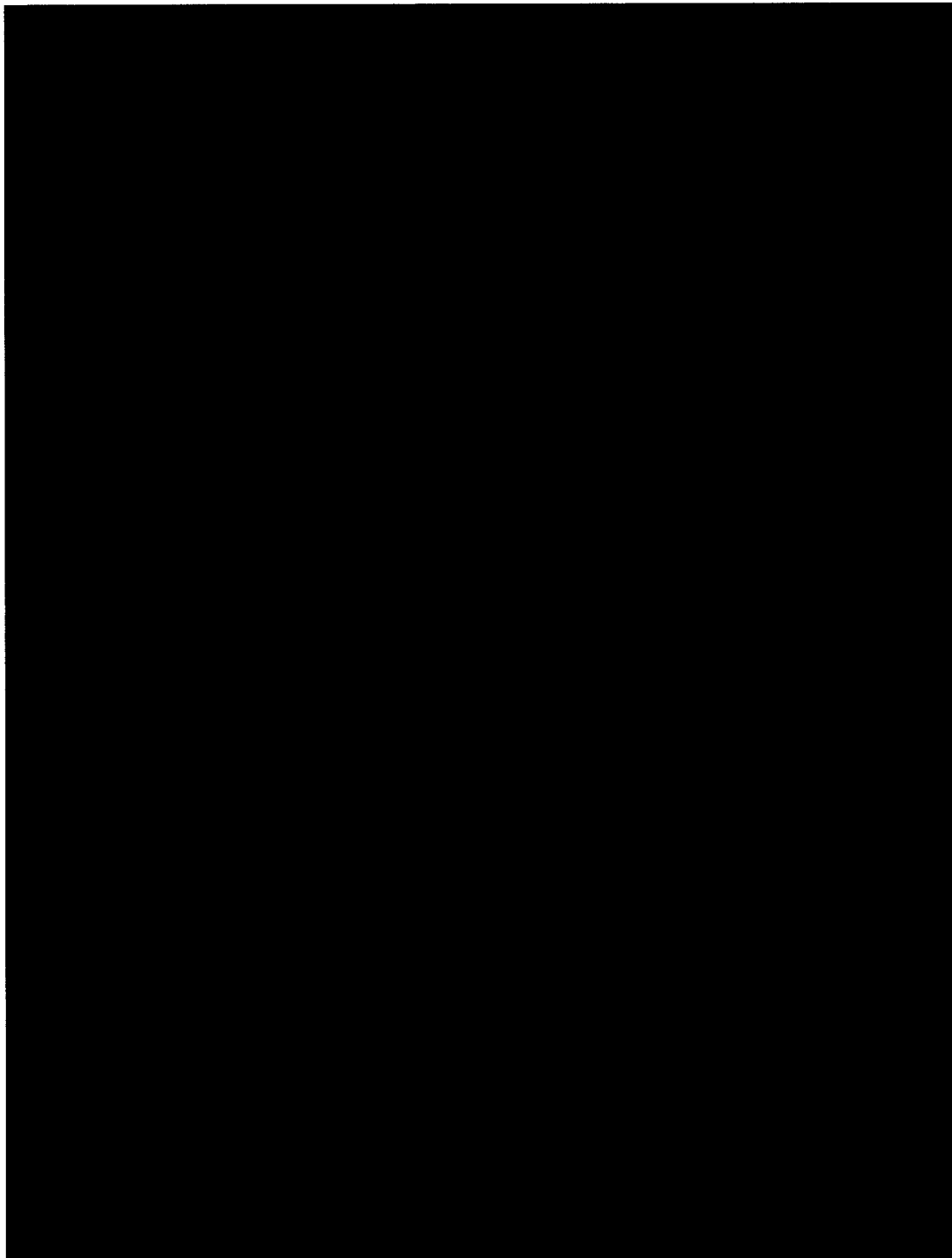
(a)

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(e)



13. Please describe the training you provide to your customer service representatives regarding Lifeline and provide the script used by your company's representatives.

Response: i-wireless provides comprehensive training to all of its customer service representatives encompassing the following (see CONFIDENTIAL Exhibit C):

1. Overview of the Lifeline Assistance Program
2. Eligibility criteria for participation in the Lifeline Assistance Program by state, including, qualifying public-assistance programs and federal poverty household income requirements
3. Limit of one Lifeline benefit per household requirement
4. Annual Certification requirement
5. Activation and Use requirement
6. Summary of Lifeline product offering and rate plan options provided by Access Wireless, Customer Care contact information
7. Step-by-step instructions on the enrollment process using the CGM Electronic Enrollment Compliance Platform application
8. Acceptable forms of supporting documentation for identification, income verification and qualifying program participation
9. NLAD validation messages and resolution processes

14. Please provide any link on your Web site that provides Lifeline information.

Response: www.accesswireless.com

15. Does your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

Response: No, not applicable

16. Do you anticipate offering and seeking reimbursement for Basic Internet Access Services (BIAS) in Florida as part of the Lifeline Program? If yes, please project when you will offer BIAS and when you will seek reimbursement for it.

Response: Yes. As permitted by the FCC's new Lifeline Order, i-wireless plans to begin offering a Lifeline Broadband service plan offering effective, December 1, 2016.

17. Do you see any impediments in the implementation to the FCC's new Lifeline Order (FCC 16-38)?

Response: i-wireless collaborated with other Lifeline ETCs to file comments asking the FCC to reconsider its broadband minimum service standard increases, phase-out of support for voice only service and rolling recertification rule. We assert that the post-year-one broadband minimum service standard is too much, too soon, and relies on a flawed formula for increases that will harm consumers and ETCs alike.

Similarly, we assert that the Commission should not phase-out support for voice only service until it has been confirmed through a review of the marketplace that there is no longer meaningful demand and need for standalone voice services among the Lifeline-eligible population. Lastly, we requested that the Commission delay the implementation of the rolling recertification rule, at least until the National Verifier is in place. In this way, the Commission can provide ETCs with sufficient time to modify internal systems and educate consumers about the new process and what to expect without causing undue burden for ETCs or confusion for consumers.

18. To the extent you have experienced a decline in Lifeline customers, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting the Lifeline participation in Florida are welcome.

Response: i-wireless experienced a minor decline in its subscriber base during the period of November 2015 to January 2016, attributable to the seasonality associated with outreach efforts and mobile enrollment events. As the weather turns colder and the holiday season approaches, enrollment activities occur with less frequency. Additionally, Lifeline customers that fail to respond to the company's attempt to obtain recertification and impending notice of de-enrollment must be de-enrolled within five business days following the expiration of the subscriber's time to respond to the recertification efforts.

EXHIBIT A

CONFIDENTIAL & PROPRIETARY

	Total residential access lines in service	Total End of Period Lifeline customers	New Lifeline customers enrolled	Lifeline customers de-enrolled	Transitional Lifeline Participants	Tribal Lifeline customers
2015						
2015						
2015						
2015						
2015						
2015						
2015						
2016						
2016						
2016						
2016						
2016						
2016						

Number of customers denied Lifeline service, by category

	NLAD Failures, Invalid Address, Name/DOB Mismatch		NLAD Failures, Invalid Address, Name/DOB Mismatch
7 2015		1 2016	
8 2015		2 2016	
9 2015		3 2016	
10 2015		4 2016	
11 2015		5 2016	
12 2015		6 2016	

EXHIBIT B

CONFIDENTIAL & PROPRIETARY

This Exhibit is confidential in its entirety

EXHIBIT C

CONFIDENTIAL & PROPRIETARY

This Exhibit is confidential in its entirety