

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: August 31, 2016
TO: Carlotta Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Curtis J. Williams, Office of Telecommunications *CW AJ*
RE: Docket No. 160150-TX - Document Filing

Please file a copy of the attached documents in Docket No. 160150-TX. The documents include Phone Club Corporation's Lifeline Compliance Plan and the Federal Communications Commission's Public Notice approving the plan.

Please let me know if you have any questions.

Thank You.

Attachments

RECEIVED-PPSC
2016 AUG 32 AM 10:32
COMMISSION
CLERK



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <https://www.fcc.gov>
TTY: 1-888-835-5322

DA 16-905

Released: August 10, 2016

WIRELINE COMPETITION BUREAU APPROVES THE WIRELINE COMPLIANCE PLANS OF GLOBAL CONNECTION AND PHONE CLUB CORPORATION

WC Docket No. 09-197
WC Docket No. 11-42

The Wireline Competition Bureau (Bureau) approves the wireline compliance plans¹ of Global Connection, Inc. of America and Phone Club Corporation, filed pursuant to the *2015 Lifeline FNPRM and Order*² and the *2012 Lifeline Reform Order*,³ as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the continued provision of Lifeline service.⁴

In the *2015 Lifeline FNPRM and Order*, the Commission amended the Lifeline program rules to eliminate Lifeline reimbursement for wholesale service provided to resellers.⁵ Only ETCs providing Lifeline service directly to the consumer may seek reimbursement from the Lifeline program for the service provided.⁶ Effective August 15, 2016, non-ETC resellers will no longer be eligible to receive support for the provision of Lifeline service, and they must obtain approval of a Lifeline compliance plan in order to obtain ETC designations from state regulators or the Commission.

Global Connection, Inc. currently provides resold wireline Lifeline service to nearly 5,000 eligible customers in states where it does not have an ETC designation for its wireline services.⁷ Phone Club Corporation provides resold wireline Lifeline service in Florida, where it does not have an ETC designation.⁸ Accordingly, Global Connection, Inc. and Phone Club Corporation each seek approval of their respective amended Lifeline compliance plans for wireline service as prerequisites to obtaining the

¹ See Revised Wireline Compliance Plan of Global Connection Inc. of America, WC Docket No. 09-197, 11-42 (filed Jul. 14, 2016); Revised Compliance Plan of Phone Club Corporation, WC Docket No. 09-197, 11-42 (filed July 26, 2016).

² *In the Matter of Lifeline & Link Up Reform & Modernization*, 30 FCC Rcd 7818 (2015) (*2015 Lifeline FNPRM and Order*).

³ *Lifeline and Link Up Reform and Modernization et al*, 27 FCC Rcd 6656 (2012) (*2012 Lifeline Reform Order*).

⁴ See *id.*, 27 FCC Rcd at 6816, paras. 379-380.

⁵ *2015 Lifeline FNPRM and Order*, 30 FCC Rcd at 7899, para. 244.

⁶ *Id.*

⁷ Letter from John Heitmann and Joshua Guyan, Counsel to Global Connection Inc. of America, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 09-197, 11-42, at 3 (filed Jul. 14, 2016) (Global Connection Letter).

⁸ Revised Compliance Plan of Phone Club Corporation at 2-3.

necessary ETC designations from the relevant state commissions and preventing any disruption of the Lifeline benefit for impacted wireline customers.⁹

The Act provides that in order to be designated as an eligible telecommunications carrier for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services”¹⁰ In the 2012 *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement, subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.¹¹ The Commission also conditionally granted forbearance from the Act’s facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.¹²

The Bureau has reviewed Global Connection Inc.’s and Phone Club Corporation’s wireline compliance plans for conformance with the *2015 Lifeline FNPRM and Order* and the *2012 Lifeline Reform Order*, and now approves the compliance plans.

Filings, including the above-discussed compliance plans, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission’s duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpiweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Nathan Eagan, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-0991 or TTY (202) 418-0484.

- FCC -

⁹ *Id.* at 2; Global Connection Letter at 3.

¹⁰ 47 U.S.C. § 214(e)(1)(A).

¹¹ See *2012 Lifeline Reform Order*, 27 FCC Rcd at 6813-18, paras. 368-381.

¹² See *id.*, 27 FCC Rcd at 6814, 6819, paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *2012 Lifeline Reform Order*. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, 27 FCC Rcd 2186 (WCB 2012).

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of
Federal Universal Service
Lifeline and Link Up Reform Modernization
Non Facility Based Compliance Plan
For Phone Club Corporation

WC Docket No. 09-197 WC
Docket No. 11-42

COMPLIANCE PLAN OF PHONE CLUB CORPORATION

In the Lifeline Reform Order, the Commission adopted rules and procedures through which it instituted "blanket forbearance" from the applications of the facilities requirement to all telecommunications carriers seeking a limited ETC designation to provide wireline Lifeline services. In order to qualify for this blanket forbearance, the Commission requires carriers to comply with certain 911 requirements and file and receive approval of a compliance plan providing specific information about its service offerings and procedures to safeguard against waste, fraud and abuse.

Therefore, PHONE CLUB respectfully submits this Plan in accordance with the Lifeline Reform Order and instructions set forth in the Wireline Competition Bureau Public Notice issued on February 29, 2012.

PHONE CLUB seeks approval of this compliance plan only for the provision of Lifeline support to provide wireline services within the State of Florida. This Plan sets forth PHONE CLUB's service offerings and the procedures and measures it will use to safeguard against waste, fraud and abuse. In support of this request, PHONE CLUB provides the following information:

(1) Information about the carrier and the Lifeline plans it intends to offer:

(a) Names and identifiers used by the carrier, its holding company, operating company and all affiliates;

PHONE CLUB is a Florida corporation located at 4262 Old A1A Palm Coast FL 32137. Phone Club is a female, Latin owned and operated company and has no other affiliated company. We solely provide Local Telephone Service in the State of Florida through resale of AT&T. This Company has provided resold Lifeline Program to its consumers since 2009 and serviced the Floridian community with Local Telephone Service since 2002. We do not provide any other service other than the basic landline service among with calling features. Since Phone Club does not provide more sophisticated products such internet, we had focused on low income consumers that rely solely on traditional telephone service. We provide Lifeline to 90% of our customers and they will be affected if the company does not obtain its ETC license before August 15 2016. Being a mom & pop business, we keep direct contact with our customers which facilitate the assurance of the compliance with the Lifeline requirements. After the financial crises of our country in 2008 we experienced a huge amount of consumers having their phone service disconnected due to affordability. That was when we decided to provide low income assistance to the financial challenged end users. We kept their signed Lifeline application together with a photocopy of their benefit on file and kept close attention to any changes.

(b) Detailed information demonstrating the carrier is financially and technically capable of providing the supported Lifeline services in compliance with the Commission's rules;

As a long-time provider of wireline services in Florida, Phone Club has a proven record of technical and financial qualifications. As a carrier who has provided service for 14 years, Phone Club possesses the financial viability, as well as the expertise to continue to provide affordable and quality service to customers and has the proven experience to maintain its compliance with all applicable federal and state regulatory guidelines. Phone Club derives the majority of its revenue from the telecommunications services it provides to its customers. In addition, PHONE CLUB has not been subject to any type of enforcement action or revocation proceeding by the FCC or any state utility regulatory commission. As a Lifeline service provider, PHONE CLUB would continue to work with AT&T, who provides the necessary network infrastructure and wireline facilities necessary for the operation of this company.

(c) detailed information, including geographic locations, of the carrier's current service offerings if the carrier currently offers service;

PHONE CLUB provides Local Telephone service in the State of Florida on AT&T territory.

Please see exhibits A of AT&T Florida Map.

(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided and additional charges, if any, for toll calls;

PHONE CLUB provides Local Telephone service (landline) with unlimited local calls. The current rate for Lifeline customers including the Lifeline discount of \$9.54 is \$25.99 monthly.

For customers not enrolled on the Lifeline program, the monthly rate for Basic Service with unlimited local call is \$35.99

Prices for additional calling features varies from \$5.00 to \$10.00

(e) All other certifications required under newly amended section 54.202 of the Commission's rules.

Section 54.202 requires ETCs to (1) certify that it will comply with the applicable service requirements; (2) file a five-year plan detailing proposed improvements or upgrades in the network unless the ETC is receiving only Lifeline support; (3) demonstrate that it will continue to function in emergency situations including reasonable back-up backup power and emergency traffic management; (4) demonstrate that the carrier will comply with applicable consumer protection and service quality standards; (5) demonstrate that it is financially and technical qualified to provide Lifeline services that comply with the applicable rules; and (6) provide information concerning the terms and conditions of the service plans offered to Lifeline customers. In response to item (1), PHONE CLUB certifies that it will comply with applicable service requirements and regulations for Lifeline support. In response to item (2), PHONE CLUB is not required to submit a five year plan since it is seeking to obtain only Lifeline support for its eligible customers. In response to item (3), as a CLEC provider over 14 years, PHONE CLUB has significant experience with emergency preparedness. In addition, PHONE CLUB's agreement with AT&T provides for the continuation of services during emergencies and sets forth obligations for the service to remain functioning during disasters and similar emergency situations. In response to item (4), PHONE CLUB certifies that it will comply with the applicable consumer protection and service quality standards. As an operating CLEC, PHONE CLUB is already subject to state consumer protection and service quality requirements. PHONE CLUB's Lifeline customers will also receive the same quality service and protections.

(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all

consumer eligibility, consumer enrollment and re-certification procedures as required by Section VI and Appendix C of the Lifeline Reform Order, and a copy of the carrier's certification form;

Under the Lifeline Reform Order, ETCs must comply with eligibility rules for Lifeline services, including initial eligibility, certification, and annual re-certification procedures. In addition to the Commission's rules, PHONE CLUB must also comply with all certification and verification requirements for Lifeline eligibility established by states where PHONE CLUB is designated as an ETC. For states that do not have a Lifeline administrator or state agency responsible for determining eligibility and initial certifications and annual certifications, PHONE CLUB certifies it will comply with the Commission's certification and verification requirements and will follow the procedures outlined below until such time as the Commission implements its planned National Lifeline Accountability Database.

PHONE CLUB ONLY SEEKS TO PROVIDE LIFELINE ASSISTANCE PROGRAM IN THE STATE OF FLORIDA.

Procedures for Initial Eligibility Determination and Certification of Lifeline Subscribers.

With respect to determining eligibility certification procedures, the rules provide that an ETC must determine a Lifeline applicant's eligibility and provide and receive certification forms with proper documentation from Lifeline subscribers, except where there is a state Lifeline administrator or a state agency responsible for eligibility verification. In states where there is a third party entity acting as the Lifeline administrator (also referred to as the "Low Income Discount Administrator" or "LID A" in Texas) who is responsible for determining the eligibility of consumers seeking to subscribe to Lifeline service, sending out certification forms, reviewing documentation and providing ETCs with the appropriate approval of a potential subscriber's eligibility for Lifeline, PHONE CLUB will comply with the program rules established in those states and will cooperate fully with any state Lifeline administrator. Based on PHONE CLUB's history of providing Lifeline and non-Lifeline customers in wireline products, PHONE CLUB's primary source of signing up Lifeline customers will be via telephone, although some customers may be signed up in person at temporary locations staffed by PHONE CLUB employees. Visitors to PHONE CLUB's website will be given information about the program but are required to contact PHONE CLUB directly via telephone to complete the sign-up process. These callers speak to PHONE CLUB employees who are specially trained on the Lifeline programs. PHONE CLUB's customer services representatives will review income- and program-based requirements with applicants via telephone contact. During the initial sign up for service, PHONE CLUB will (a) require the applicant to confirm that he or she is not already receiving a Lifeline service and that no one else in the applicant's household is subscribed to a Lifeline service in order to avoid providing duplicate services; and (b) inform the applicant of both the income- and program-based eligibility requirements to determine initial eligibility and any state-specific requirements.

Customers are offered the choice to either sign up for service as a non-Lifeline customer pending confirmation of eligibility, or to have their application for service held pending confirmation of eligibility. In the event the customer chooses to proceed, they are processed as a new non-Lifeline customer and the verification process continues as described below. The customer would only be given the Lifeline discount when they have satisfied the verification process, either through the state administrator or PHONE CLUB's internal process. If the customer is eventually deemed ineligible, they receive no credit. Where the customer chooses to wait for confirmation of eligibility before starting service, the employee will take down the relevant information from the consumer, including payment information, but the order is then held pending verification of eligibility. Only if the customer is determined to be eligible is the order processed. PHONE CLUB will not provide Lifeline service or seek reimbursement for providing services to such applicant until it receives a certification of eligibility. In states where there is no Lifeline administrator or state agency responsible for determining initial eligibility and certifying Lifeline applicants, PHONE CLUB will require all applicants to demonstrate either: (1) the applicant's household income is at or below 135% of the Federal Poverty Guidelines based on the income-eligibility criteria set forth in Sections 54.409(a)(1) or (a)(3) or (2) the applicant participates in Medicaid, Food Stamps, Supplemental Security Income, Federal Public Housing Assistance, Low-Income Home Energy Assistance Program, National School Lunch Program or Temporary Assistance for Needy Families. As required to prevent suspected duplications, PHONE CLUB will also require the customer to complete the Lifeline Household Worksheet issued by USAC to ensure that duplicate support is not provided to any household. PHONE CLUB will inform the applicant that any information provided will be submitted to USAC as necessary under the Commission's rules to verify the household is not receiving duplicate Lifeline support. After confirming initial eligibility either in person or over the phone, PHONE CLUB will provide the individual with an application via mail requiring him or her to provide certain information and certify that they meet either the income-based eligibility requirements or the program-based requirements, make certain certifications and submit documentation. Specifically, PHONE CLUB's Lifeline application form will collect the following information from the potential Lifeline customers: (i) the subscriber's full name; (ii) the subscriber's full residential street address (P.O. Boxes will not be acceptable); (iii) whether the residential address is permanent or temporary; (iv) the subscriber's billing address, if different; (v) the subscriber's date of birth; (vi) 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); (vii) 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 (viii) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.

In addition, as part of the Lifeline application, PHONE CLUB will require all Lifeline applicants to certify, under penalty of perjury, that:

- the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline either because the household receives benefits from a state or federal assistance program (and

list the name of the program) or has income at or below 135% of the Federal Poverty Guidelines;

- the applicant has provided documentation to PHONE CLUB that correctly and accurately confirms the subscriber's household income or participation in the above-listed program(s);
- the applicant will notify its carrier within thirty (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 applicant is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit. The applicant will also certify that they understand this requirement and may be subject to penalties if they fail to notify PHONE CLUB;
- the applicant acknowledges that the subscriber will be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits;
- the applicant's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- the information contained in the applicant's certification form is true and correct to the best of his or her knowledge, that providing false or fraudulent documentation or information in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program;
- That a violation of the one-per-household rule constitutes a violation of FCC rules and will result in their de-enrollment from the Lifeline program
- the applicant understands that Lifeline is a non-transferable benefit and the service may not be transfers to anyone else; and
- the applicant understands their information, including name, telephone number and address, will be given to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying the applicant and the applicant's household do not receive more than one Lifeline benefit and consenting to the inclusion of that information into a Lifeline database.

A sample of Phone Club's application is attached hereto as Exhibit B.

This application is mailed by PHONE CLUB to the customer for completion and is returned to PHONE CLUB for review and certification. All applications are reviewed by PHONE CLUB employees. Should PHONE CLUB engage sales agents to assist in signing up customers, those applications will also be reviewed by PHONE CLUB employees to ensure the applicant's eligibility. This review includes a review to determine eligibility as well as a duplicate review process described below. PHONE CLUB will make itself available as a direct point of contact with all Lifeline applicants. In addition, all PHONE CLUB employees who have contact with

potential Lifeline customers will be fully trained on the state and Commission Lifeline eligibility rules.

If PHONE CLUB cannot determine a prospective subscriber's eligibility through a review of an appropriate federal or state database, PHONE CLUB personnel will require the submission of appropriate documentation required to establish income-based and program-based eligibility and will review each subscriber's documentation for compliance with the eligibility criteria. If documentation is not sufficient or if the application is incomplete, then PHONE CLUB will deny the application and inform the applicant of the reason for such rejection. For applicants submitting proof of income eligibility or program-based eligibility, PHONE CLUB will not retain copies of such documentation but will maintain accurate records detailing how the customer demonstrated his or her eligibility.

Procedures for Annual Re-Certification.

Similar to the initial certification process, an ETC must annually certify all subscribers, unless there is a Lifeline administrator that is responsible for re-certification. In states where a Lifeline administrator is responsible for completing annual re-certifications, PHONE CLUB will rely on such administrator completing the annual certification. If the Lifeline administrator provides notice to PHONE CLUB that a current subscriber did not re-certify, then PHONE CLUB will comply with the de-enrollment requirements required by the FCC's rules. PHONE CLUB will cooperate fully with any Lifeline administrator and take any necessary steps to ensure it is in compliance with both state and federal re-certification procedures. In states where there is not a Lifeline administrator, PHONE CLUB will require its Lifeline subscriber to annually re-certify their eligibility as set forth in Rules 54.41 0(±)(2) and (f)(5) and 54.405(e)(4). PHONE CLUB may complete the re-certification process on a rolling basis throughout the year. If PHONE CLUB cannot determine on-going eligibility by accessing a qualifying database, PHONE CLUB will re-certify the continued eligibility of its subscribers by contacting them in person, in writing (by mail), by phone or by email.. As part of the re-certification process, PHONE CLUB will inform its Lifeline subscribers that they must confirm eligibility to retain Lifeline benefits, when Lifeline benefits will be terminated if confirmation of eligibility is not provided and how to contact PHONE CLUB for more information or assistance. If a Lifeline subscriber does not respond to the notice within 30 days, PHONE CLUB will send a notice of impending termination. Subscribers who do not respond to the impending termination notice will be de-enrolled from the Lifeline program within five business days.

(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access;

The Commission conditioned its grant of forbearance on an ETC (a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no

additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.

PHONE CLUB provides local telephone service (landline) through the resale of AT&T and therefore, Phone CLUB subscribers will experience the same reliable 911 service as of any AT&T retail customers.

(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;

PHONE CLUB has experience in providing clear, concise and consistent marketing and disclosure information to its wireline Lifeline customers., PHONE CLUB will emphasize in clear, easily understood language: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. PHONE CLUB will also explain that Lifeline is a government benefit program and willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. PHONE CLUB has and will continue to advertise its products and Lifeline program thru community newspapers, community churches, direct mail and internet.

(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.

PHONE CLUB fully understands and shares the Commission's commitment to minimize waste, fraud and abuse with respect to the Lifeline program.

PHONE CLUB offers wireline service to low income customers in the State of Florida, therefore, the subscriber's service address is also the service location, which permits Phone CLUB to accurately prevent duplicates. Activation and Non-Usage Policy. PHONE CLUB will not consider a subscriber activated until the customer has chosen a non-Lifeline service plan, activates their service by paying the activation fee, and then applies for and is approved for a Lifeline service plan. Adhering to this "prequalification guideline" prevents waste, fraud and abuse by requiring customers to first sign up for service at regular rates and then only provide discounted service once the customer's eligibility has been confirmed through verification. As such, PHONE CLUB will not seek reimbursement for any subscriber until the subscriber activates service and is approved by PHONE CLUB. Customers who wish to be confirmed as an eligible Lifeline subscriber prior to commencing service can place a non-Lifeline order and have the order held pending verification of eligibility as described above. Because customers do not receive service until they have an order processed and the activation fee is paid. Thus, there is no possibility of PHONE CLUB receiving reimbursement for a customer who does not have an active service.

PHONE CLUB will cooperate with the Commission and has and will continue to cooperate with state regulators and Lifeline administrators to prevent waste, fraud and abuse. PHONE CLUB will, for example:

- As applicable, participate in industry working groups conducted by or in coordination with state commissions and Lifeline administrators;
- Respond to requests from the Commission, USAC or state commissions concerning consumers' eligibility to be enrolled in Lifeline service, among other matters;
- Upon having a reasonable basis and/or upon any notification from federal or state commissions and/or Lifeline administrators, timely investigate issues concerning a PHONE CLUB Lifeline customer receiving service from another carrier or customers receiving more than one Lifeline subsidy per household;
- As applicable and when available, access the National Lifeline Accountability 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; and
- Comply with federal and state audit requirements.

CONCLUSION

PHONE CLUB respectfully submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the Lifeline Reform Order. Accordingly, PHONE CLUB respectfully requests approval of this Compliance Plan so that PHONE CLUB can provide essential Lifeline service to eligible low-income customers in the State of Florida.

Prepared and submitted by:

Priscila Wolff

President

Phone Club Corporation

July 25, 2016.

EXIBITS

LIFELINE APPLICATION (PLEASE SEND COPY OF DOCUMENTS)

Important! You do not qualify for Lifeline Home Phone Service if you already receive a government discount on your wireless Service!

BillingName _____

ServiceAddress _____

City _____ State _____ Zip Code _____

Last Four Digits of Social Security Number _____

Telephone Number _____

I hereby certify that I participate in the following public assistance program(s):

(Check all that apply)

- Temporary Cash Assistance
- Food Stamps
- Medicaid
- Low-Income Home Energy Assistance Program (LIHEAP)
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- National School Lunch Program (NSLP) – Free Lunch
- Bureau of Indian Affairs Programs (Tribal Temporary Assistance for Needy Families,

Head Start Subsidy, NSLP)

I certify that I am a current recipient of the above program(s) and will notify my local telephone company when I am no longer participating in any of the above-designated program(s). I give permission to the duly authorized official(s) administering the above programs to provide to the local telephone company my participation status in any of the above program(s). I give this permission on the condition that the information in this form and any information about my participation in the above programs provided by officials be maintained by the company as confidential customer account information. I am aware that pursuant to Section 837.06, Florida Statutes,

whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.

Customer's signature

Date

*Please mail this application signed together with the copies of the documents that proves your eligibility to one of the programs above. *The documents must show the same name and address that shows on your phone bill.

*****DO NOT SEND ORIGINALS*****

Solicitud de LIFELINE Programa de Ahorro Telefonico (IMPORTANTE - ENVIE COPIAS DE SU BENEFICIO)

Nombre que aparece en su Cuenta Telefónica

Dirección (donde recibe el servicio telefónico)

Ciudad _____ Estado _____ Código Postal _____

Las Últimas Cuatro Cifras de su Número de Seguro Social _____

Número de Teléfono: _____

Yo certifico que participo en el (los) siguiente(s) programa(s) de servicio público:

(Marque cada programa en el que participe).

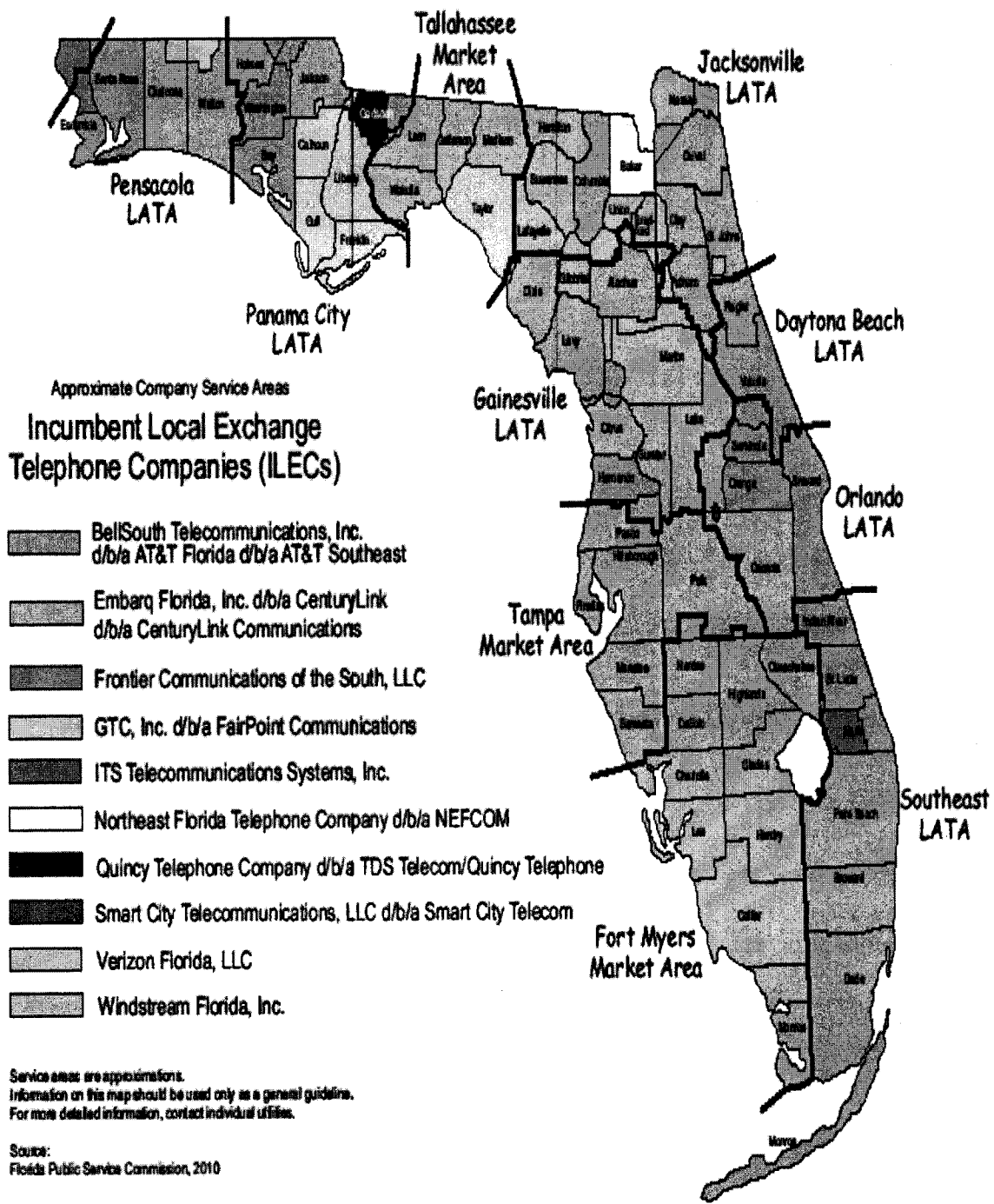
- Asistencia Temporal en Efectivo (TCA)
- Cupones de Alimentos
- Medicaid
- Programa de Asistencia de Energía para Hogares de Bajos Ingresos (LIHEAP)
- Seguro de Ingresos Suplementarios (SSI)
- Asistencia Federal de Viviendas Públicas (Sección 8)
- Programa Escolar Nacional para Almuerzos Gratis (NSLP)
- Programas del Negociado de Asuntos Indígenas (Asistencia Temporal para Familias Necesitadas. Tribal, Subsidio para el Programa de Enseñanza Preescolar, Programa Escolar Nacional para Almuerzos)

Certifico que actualmente soy recipiente del(los) programa(s) arriba mencionado(s) y que notificaré a mi compañía telefónica local cuando ya no participe más en cualquiera de dichos programas. Doy permiso al funcionario(s) debidamente autorizado(s) que administra los programas para que proporcione a la compañía telefónica local mi estado de participación en cualquiera de estos programas. Doy este permiso con la condición de que la información en esta solicitud y cualquier información sobre mi participación en estos programas proporcionada por los funcionarios, sea mantenida por la compañía como información confidencial del cliente de la cuenta. Estoy consciente que de acuerdo con la Sección 837.06 de los Estatutos de Florida, cualquiera que a sabiendas hace una declaración falsa por escrito con el propósito de engañar a un funcionario público en el desempeño de su deber será culpable de delito menor de Segundo grado.

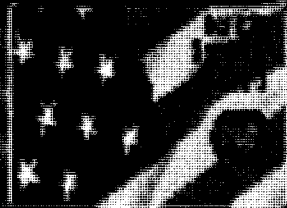
Firma del Cliente / Fecha

****Solamente envíe las copias de los documentos que son pertinente a su hogar**

NO MANDE DOCUMENTOS ORIGINALES



TURN THIS...



...INTO THIS

HOME PHONE SERVICE / TELEFONO RESIDENCIAL

If you receive / Si recibes

- Food Stamps
- Medicaid
- Kids School Lunch Program
- Supplemental Security Income (SSI) and more...

\$ 19.99
 per month
 • No Credit Check
 • No Deposit
 • No Contract

1 FREE MONTH/ MES GRATIS

CALL NOW
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 HUBLA MIS ESTIMOS <http://www.phonoclub.us/>

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