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April 17, 2024

VIA ELECTRONIC DELIVERY

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Global Connection Inc. of America d/b/a STAND UP WIRELESS
Petition for ETC Designation

To Whom It May Concern,

Global Connection Inc. of America d/b/a STAND UP WIRELESS hereby submits the attached Petition for Designation as an Eligible Telecommunications Carrier (“ETC”).

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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d/b/a STAND UP WIRELESS*

Attachments
cc: Jennifer Carter

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Global Connection Inc. of America)
d/b/a STAND UP WIRELESS)
Petition for Designation as an Eligible)
Telecommunications Carrier)
_____)

Docket No. _____

PETITION

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I. INTRODUCTION

Global Connection Inc. of America d/b/a STAND UP WIRELESS (“STANDUP” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Florida Public Service Commission (“Commission”), including section 364.10 Florida Statutes (F.S.), as recently amended, hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Florida (this “Petition”).

STANDUP seeks ETC designation solely to provide Lifeline service to qualifying Florida consumers; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or high cost program.³ As demonstrated herein, and as certified in Exhibit 1 attached hereto, STANDUP meets all the statutory and regulatory requirements for designation as an ETC in the State of Florida,

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ Given that the Company only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

including the requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*,⁴ *Lifeline Modernization Order*,⁵ and *Fifth Report and Order*.⁶ Furthermore, STANDUP is positioned to reach unserved and underserved Lifeline-eligible consumers. Rapid grant of STANDUP’s request, therefore, would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array of low-income Florida residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Petition should be addressed to:

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⁴ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline and Link Up Reform Order*”).

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*Third Report and Order*” or “*Lifeline Modernization Order*”).

⁶ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, “*Fifth Report and Order*”).

II. COMPANY OVERVIEW

Global Connection Inc. of America d/b/a STAND UP WIRELESS is a Georgia Corporation,⁷ with its principal office located at 842 Monmouth Street, Newport, Kentucky 41071. Global Connection Inc. of America is authorized to provide business as a foreign corporation in the State of Florida, and the d/b/a STAND UP WIRELESS is also registered with the Florida Secretary of State. See Exhibit 2 which is attached hereto. STANDUP is owned twenty-five per cent (25%) by Global Connection Holdings Corporation (“Global Holdings”) and seventy-five per cent (75%) by Odin Mobile, LLC (“Odin Mobile”). Global Holdings and Odin Mobile both operate as holding companies and do not provide telecommunications services.

STANDUP is a provider of commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless network of T-Mobile USA, Inc. (“T-Mobile” or its “Underlying Carrier”) on a wholesale basis. STANDUP is currently designated as an Lifeline only wireless ETC in the following jurisdictions: Alabama, Arkansas, Arizona, California, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, Wisconsin and West Virginia. STANDUP also provides prepaid wireless telecommunications services throughout the United States through the FCC’s Affordable Connectivity Program (“ACP”).

STANDUP will provide affordable prepaid mobile phone service and high quality customer service. STANDUP’s service offering will include: (1) local and long distance calling; (2) access to the following custom calling features at no charge: (a) Caller ID; (b) Call Waiting;

⁷ Global Connection Inc. of America was incorporated in the State of Georgia on June 1, 1998.

(c) Call Forwarding; (d) 3-Way Calling; and (e) Voicemail; (3) text messaging; (4) broadband access; and (5) the option for a consumer to “bring their own device”. STANDUP may provide user-friendly handsets or hotspot devices. STANDUP’s products and plans will be specially geared toward serving lower income communities. The Company will not require service contracts from its customers, and it will always ensure competitively low pricing for its services and products. STANDUP will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and customer service. The Company’s prepaid, budget-friendly pricing will give many low-income consumers the option of having mobile phone service and broadband access without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their STANDUP service to suit their needs with STANDUP’s available bundles of minutes, broadband data, and text packages to supplement their monthly plan.

STANDUP’s Lifeline customers will be low-income consumer households that will depend on, and benefit greatly from, STANDUP’s inexpensive and flexible pricing plans. STANDUP will not impose credit checks, nor will it require any deposits or contractual commitments. Many of STANDUP’s customers likely will turn to STANDUP because they cannot afford the postpaid services provided by traditional wireless carriers. STANDUP will affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, STANDUP will contribute to the expansion of mobile wireless and broadband services for low-income consumers in Florida.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.⁸ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.⁹ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). The Commission now has jurisdiction over designation of wireless ETCs pursuant to Enactment of the Florida Legislature which passed Senate Bill 478, both the Florida Senate and the House of Representatives, and was signed into law effective April 15, 2024, which amended 364.10, F.S. as follows:

364.10(1)(a) For the purposes of this section, the term “eligible telecommunications carrier” means an entity a telecommunications company, as defined by s. 364.02, which is designated as an eligible telecommunications carrier by the commission pursuant to 47 C.F.R. s. 54.201 and this section.

364.10(3)

(a) The commission has the power and authority to designate an entity, upon petition and in accordance with 47 C.F.R. s. 54.201, as an eligible telecommunications carrier, provided that such entity is: 1. A telecommunications company; or 2. A commercial mobile radio service provider.

(b) This legislative authority is intended to be sufficient to enable the commission, for the limited purpose of providing Lifeline service under this section, to approve any of the types of entities specified in paragraph (a) as an eligible telecommunications carrier.

STANDUP therefore requests that the Commission expeditiously process the instant Petition so that STANDUP can quickly begin expanding the availability of affordable Lifeline-supported wireless services to qualifying low-income customers in Florida.

⁸ 47 U.S.C. § 214(e)(2).

⁹ *USF Order*, at 8858–59, ¶ 145.

STANDUP recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.¹⁰ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: "[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section." As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore, may not apply the facilities-based requirement to STANDUP. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant STANDUP's request for designation as an ETC throughout the State of Florida.

IV. STANDUP SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201

Section 254(e) of the Act provides that, "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹¹ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their

¹⁰ See *Lifeline and Link Up Reform Order* at ¶ 368.

¹¹ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) ("USF Order").

own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has forbore from the "own facilities" requirement. Applicants also must commit to advertise the availability and rates of such services.¹² As detailed below, STANDUP satisfies each of the above-listed requirements.

A. STANDUP Will Provide Service Consistent with the FCC's Grant of Forbearance from Section 214's Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as STANDUP. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the "own-facilities" requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹³

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.

In accordance with the *Lifeline and Link Up Reform Order*, STANDUP filed a Compliance Plan with the FCC, which the FCC approved on May 25, 2012.¹⁴ A copy of STANDUP's FCC-approved revised Compliance Plan is attached hereto as Exhibit 3.¹⁵ STANDUP commits to

¹² See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

¹³ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

¹⁴ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

¹⁵ See Public Notice DA 18-854 (rel. August 15, 2018).

providing Lifeline service in Florida in accordance with its FCC-approved Compliance Plan, as amended, and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

B. STANDUP Is a Common Carrier

CMRS providers like STANDUP are treated as common carriers.¹⁶

C. STANDUP Will Provide All Supported Services

Through its Underlying Carrier, STANDUP is able to provide all of the supported services required by Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) as follows:

1. Voice Telephony Service

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

Voice Grade Access to the Public Switched Telephone Network. STANDUP provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from its Underlying Carrier.

Local Usage at No Additional Charge. STANDUP offers rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. STANDUP provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available

¹⁶ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services.*") (emphasis added).

regardless of service activation status or availability of minutes. STANDUP also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.¹⁷ "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."¹⁸ Nonetheless, STANDUP's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. STANDUP's service, moreover, is not offered on a distance-sensitive basis and local and domestic long-distance minutes are treated the same.

2. Broadband Internet Access Services

STANDUP provides Broadband Internet access service ("BIAS") to ensure its Lifeline customers receive full Lifeline support. The FCC has stated that BIAS consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."¹⁹ STANDUP provides BIAS to low-income consumers via resale of its Underlying Carrier's services.

D. STANDUP Requests Designation Throughout Its Service Area

STANDUP is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, STANDUP is required to describe the geographic area(s) within which it requests designation as an ETC. STANDUP requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based

¹⁷ See *Lifeline and Link Up Reform Order* at ¶ 367.

¹⁸ See *id.* at ¶ 49.

¹⁹ See 47 C.F.R. § 8.2(a).

providers have wireless coverage, including federally recognized tribal lands. The current coverage is attached hereto as Exhibit 4. STANDUP understands that its service area overlaps with rural carriers in Florida but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. STANDUP is not eligible for and does not seek Link-Up or high-cost support.

Therefore, designation of STANDUP as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²⁰ While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement), the FCC’s *Lifeline and Link Up Reform Memorandum Opinion and Order* (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.²¹ In light of this forbearance, the Commission has the authority to designate ETCs such as STANDUP in rural areas without concern for the service area conformance requirement.²²

²⁰ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

²¹ See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, *Memorandum Opinion and Order*, FCC 13-44 (rel. April 15, 2013).

²² See 47 C.F.R. § 54.207(c).

E. STANDUP Will Advertise the Availability of Supported Services

STANDUP will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). STANDUP will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, STANDUP's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) STANDUP is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Additionally, STANDUP will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

STANDUP will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as the Internet, mass media, outreach events, and community and charitable involvement.²³ STANDUP may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

²³ See Exhibit 5 for a sample advertisement.

V. STANDUP SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)

STANDUP hereby provides the additional information and certifications required for carriers seeking ETC designation as set forth in 47 C.F.R. § 54.202(a).

A. Service Commitment Throughout the Proposed Designated Service Area

STANDUP will provide service in Florida by reselling service which it obtains from its Underlying Carrier. T-Mobile's network is operational and largely built out. Thus, STANDUP will be able to commence offering its Lifeline service to all locations served by T-Mobile very soon after receiving approval from the Commission. Upon receiving ETC designation from the Commission, STANDUP will immediately apply for a study area code (SAC) from USAC, and will begin offering services upon issuance of the SAC.

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the certification attached in Exhibit 1, STANDUP commits to comply with the service requirements applicable to the low-income support that it receives, including the rules set forth in the FCC's *Fifth Report and Order*. Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. § 54.202(a)(2), STANDUP has the ability to remain functional in emergency situations. As discussed, STANDUP will utilize the extensive and well-established Tier I T-Mobile network and facilities to provide its Lifeline services. The Company understands that T-Mobile's network has access to a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. As a

reseller of T-Mobile's services, STANDUP and its customers benefit from this functionality.

C. Commitment to Consumer Protection and Service Quality

In accordance with 47 C.F.R. § 54.202(a)(3), an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. STANDUP hereby commits to comply with the CTIA Consumer Code for Wireless Service. See Exhibit 7 which is attached hereto.

STANDUP's customer service is available Monday through Saturday from 8:00AM to 10:00PM EST via phone (611 or toll-free 800-544-4441) and Monday through Saturday from 8:00AM to 9:30PM EST via online chat. Subscribers can also initiate support tickets 24 hours a day 7 days a week via an online chat and customer service representatives respond during the above-mentioned support hours. STANDUP will cooperate fully with the Commission to resolve all consumer complaints.

The Company contact for customer complaints and for the Florida PSC annual lifeline data request for Legislative report are as follows:

Peter Einisman
Compliance Analyst
Compliance@standupwireless.com
678.741.6253

D. STANDUP is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), STANDUP is financially and technically capable of providing Lifeline-supported services. STANDUP offered non-Lifeline and Lifeline wireline service from 1998 until 2019 and has been providing non-Lifeline and Lifeline-supported

wireless service since April 2011, now offering Lifeline service in thirty-four (34) jurisdictions. STANDUP has never filed for any form of bankruptcy relief. The Company generates revenues from non-Lifeline services; consequently, STANDUP has not relied (and does not intend to rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In the event USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. In addition, STANDUP's financial and technical capabilities to provide service are demonstrated by its performance of approximately 13 years in the Lifeline industry, with consistently strong service, growth, and robust protections to ensure its Lifeline customers meet eligibility requirements. The Company has not been subject to any FCC or USAC enforcement actions related to the Low Income Fund or ETC revocation proceedings in any state.²⁴

Furthermore, the senior management of STANDUP has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to STANDUP.²⁵ STANDUP will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carrier.

E. Terms and Conditions of Proposed Lifeline Offering

STANDUP has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout Florida. STANDUP intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice and broadband usage. STANDUP commits that its Lifeline-supported voice

²⁴ The FCC issued a Notice of Apparent Liability for Forfeiture ("NAL") to the Company on December 11, 2013 alleging that STANDUP failed to comply with FCC rules by requesting and receiving reimbursement payments from the federal USF for intra-company duplicate Lifeline enrollments, a claim which the Company timely disputed. Even if the alleged duplicates actually were duplicates (which STANDUP disputed), STANDUP was still 99.38% effective at identifying and preventing duplicate enrollments. The Company entered into a Consent Decree with the FCC (Order released December 29, 2017, FCC 17-175) which resolved the NAL with no admission of liability by STANDUP.

²⁵ See Exhibit 5 for key management bios.

services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. STANDUP'S Lifeline-supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward. To the extent STANDUP provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and STANDUP will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 6 is a summary table of the Company's proposed Lifeline service offerings. Customers will be able to purchase additional minutes or data as needed. All plans will include nationwide domestic long-distance at no extra per-minute charge, and STANDUP will not assess any usage for access to its free customer services (611). Emergency (911) calls will be free, regardless of service activation or availability of minutes, and will not count against the customer's airtime. The Company's Lifeline offering will provide feature-rich mobile connectivity for qualifying subscribers without the burden of credit checks or service contracts. STANDUP's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

F. STANDUP Will Comply with Lifeline Certification and Verification Requirements

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. Customers must then apply directly through the National Lifeline

Eligibility Verifier (“National Verifier”), which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier’s or Company’s website) or request that a copy be mailed to them. STANDUP utilizes the standard Lifeline application forms as required by FCC rules, and thus complies with the disclosure and information collection requirements in 47 C.F.R. § 54.410(d).²⁶ STANDUP will certify and verify initial and continued consumer eligibility in accordance with 47 C.F.R. § 54.410, and will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. STANDUP further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers’ applications and determination of eligibility will be performed by the National Verifier.

G. Prevention of Waste, Fraud and Abuse

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. STANDUP will rely on the National Verifier to determine initial and ongoing eligibility of Florida Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database (“NLAD”) for every enrollment to determine whether a prospective subscriber is

²⁶ *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, “Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program,” DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC’s website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

currently receiving a Lifeline service from STANDUP or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. STANDUP thus complies with the requirements of section 54.404 of the FCC's rules. In addition, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers.

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), STANDUP will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, STANDUP contracts with a third party Lifeline service bureau, currently CGM, LLC, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying

network status to ensure that subsidies are requested only for active lines. Through the processes described above, STANDUP ensures that it does not over-request from support funds.

H. STANDUP Will Comply with Reporting Requirements

STANDUP will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e., FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e., FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs.

I. STANDUP Will Comply With Regulations Imposed By The Commission

By this Petition, STANDUP hereby asserts its willingness and ability to comply with the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. Upon Commission request, STANDUP is prepared to answer questions or present additional testimony or other evidence about its services within the state. STANDUP commits that 100% of federal universal service funds will flow through directly to Lifeline customers. In accordance with 364.105 F.S., STANDUP will offer Transitional Lifeline service, and STANDUP will participate in the Lifeline Promotion Process required by Florida administrative code 25-4.0665(3).

VI. DESIGNATION OF STANDUP AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is "to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies" to all citizens, regardless of geographic location or income.²⁷ Designation of STANDUP as an ETC in Florida

²⁷ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

will further that public interest. Whether because of financial constraints, poor credit history, or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. The FCC has in recent years expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”²⁸ Given this context, designating STANDUP as an ETC would significantly benefit low-income consumers eligible for Lifeline services in Florida—the intended beneficiaries of universal service.

A. Advantages of STANDUP’s Service Offering

STANDUP offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. The public interest benefits of STANDUP’s wireless service include larger calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile service, and a generous amount of voice and broadband access included without cost (after application of the

²⁸ See *Lifeline Modernization Order* ¶ 2.

Lifeline support), as well as free access to caller ID, call waiting, and Voicemail features, and access to 911 services regardless of the number of voice minutes remaining on the Lifeline consumer's plan. These no cost to consumer services and low-cost minutes are an invaluable resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for "unbanked" consumers.

STANDUP's Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (meeting the voice and broadband minimum service standards), at no net cost to the customer after application of Lifeline support. STANDUP's Lifeline offering will be provided over T-Mobile's 4G LTE network. STANDUP's prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues.

In today's market, consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents wherever they may be, allows a person seeking employment greater ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers regardless of location. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.

Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing STANDUP with the authority necessary to offer discounted Lifeline

service to those without wireless service—or most in danger of losing service altogether—undoubtedly promotes the public interest.

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.²⁹ Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of STANDUP as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.³⁰ Introducing STANDUP into the market as an additional wireless ETC provider will afford low-income Florida residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as STANDUP or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, STANDUP will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC’s Lifeline program. By implementing the

²⁹ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

³⁰ See 47 U.S.C. § 254(b)(1).

safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that STANDUP's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. STANDUP's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

VII. CONCLUSION

Based on the foregoing, designation of STANDUP as an ETC in the State of Florida satisfies the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, STANDUP respectfully requests that the Commission promptly designate STANDUP as an ETC in the State of Florida for the purpose of participating in the Lifeline program.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for Global Connection Inc. of America
d/b/a STAND UP WIRELESS*

April 17, 2024

EXHIBIT 1

Certification

STATE OF KENTUCKY)
)
COUNTY OF CAMPBELL)

I, Jennifer Carter, the Chief Operating Officer and Chief Compliance Officer of Global Connection Inc. of America d/b/a STAND UP WIRELESS (“STANDUP”), hereby state upon oath and affirmation of belief and personal knowledge that the matters, facts and statements set forth in the foregoing Petition are true to the best of my knowledge and belief; that STANDUP meets all the statutory and regulatory requirements for designation as an ETC in the State of Florida; and that STANDUP will comply with the service requirements applicable to the low-income support it receives.

Jennifer Carter
Jennifer Carter (Apr 9, 2024 14:18 CDT)

Jennifer Carter
Chief Operating & Compliance Officer
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

EXHIBIT 2

FL secretary of state authority & d/b/a Registration

APPLICATION BY FOREIGN CORPORATION FOR AUTHORIZATION TO TRANSACT BUSINESS IN FLORIDA

IN COMPLIANCE WITH SECTION 607.1503, FLORIDA STATUTES, THE FOLLOWING IS SUBMITTED TO REGISTER A FOREIGN CORPORATION TO TRANSACT BUSINESS IN THE STATE OF FLORIDA.

1. Global Connection Inc. of America

(Enter name of corporation; must include "INCORPORATED," "COMPANY," "CORPORATION," "Inc.," "Co.," "Corp.," "Ins.," "Co.," or "Corp.")

Global Connection Inc. of America (of Georgia)

(If name unavailable in Florida, enter alternate corporate name adopted for the purpose of transacting business in Florida)

2. Georgia

(State or country under the law of which it is incorporated)

3.

(FBI number, if applicable)

4. 06/01/1998

(Date of incorporation)

5.

Perpetual

(Duration: Year corp. will cease to exist or "perpetual")

6.

(Date first transacted business in Florida, if prior to registration)
(SEE SECTIONS 607.1501 & 607.1502, F.S., to determine penalty liability)

7. 3957 Pleasantdale Road, Atlanta, Georgia 30340

(Principal office address)

3957 Pleasantdale Road, Atlanta, Georgia 30340

(Current mailing address)

8. Provide telecommunication services

(Purpose(s) of corporation authorized in home state or country to be carried out in state of Florida)

9. Name and street address of Florida registered agent: (P.O. Box NOT acceptable)

Name: Corporation Service Company

Office Address: 1201 Hays Street

Tallahassee

(City)

, Florida 32301

(Zip code)

10. Registered agent's acceptance:

Having been named as registered agent and to accept service of process for the above stated corporation at the place designated in this application, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relative to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Corporation Service Company

By: Cynthia L. Harris
(Registered agent's signature)

Cynthia L. Harris
Asst. Vice President

11. Attached is a certificate of existence duly authenticated, not more than 90 days prior to delivery of this application to the Department of State, by the Secretary of State or other official having custody of corporate records in the jurisdiction under the law of which it is incorporated.

2008 JUN 11 A 9:25
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

FILED



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Foreign Profit Corporation

GLOBAL CONNECTION INC. OF AMERICA (OF GEORGIA)

Cross Reference Name

GLOBAL CONNECTION INC. OF AMERICA

Filing Information

Document Number	F08000002616
FEI/EIN Number	58-2393640
Date Filed	06/11/2008
Effective Date	06/10/2008
State	GA
Status	ACTIVE

Principal Address

842 MONMOUTH STREET
NEWPORT, KY 41071

Changed: 04/22/2021

Mailing Address

842 MONMOUTH STREET
NEWPORT, KY 41071

Changed: 04/24/2023

Registered Agent Name & Address

CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301

Officer/Director Detail

Name & Address

Title CHIEF OPERATING OFFICER

SCHIMPF, ERIC
842 MONMOUTH STREET
NEWPORT, KY 41071

Title CHIEF FINANCIAL OFFICER

APPLICATION FOR REGISTRATION OF FICTITIOUS NAME

REGISTRATION# G12000116606

Fictitious Name to be Registered: STAND UP WIRELESS

Mailing Address of Business: 5555 OAKBROOK PARKWAY
SUITE 620
NORCROSS, GA 30093

Florida County of Principal Place of Business: MULTIPLE

FEI Number: 58-2393640

FILED
Dec 05, 2012
Secretary of State

Owner(s) of Fictitious Name:

GLOBAL CONNECTION INC. OF AMERICA
5555 OAKBROOK PARKWAY, SUITE 620
NORCROSS, GA 30093
Florida Document Number: F08000002616
FEI Number: 58-2393640

I the undersigned, being an owner in the above fictitious name, certify that the information indicated on this form is true and accurate. I further certify that the fictitious name to be registered has been advertised at least once in a newspaper as defined in Chapter 50, Florida Statutes, in the county where the principal place of business is located. I understand that the electronic signature below shall have the same legal effect as if made under oath and I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s. 817.155, Florida Statutes.

DAVID SKOGEN, CEO, GCIOA

12/05/2012

Electronic Signature(s)

Date

Certificate of Status Requested (X)

Certified Copy Requested ()

EXHIBIT 3

FCC-Approved Compliance Plan



PUBLIC NOTICE

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

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

DA 18-854

Released: August 15, 2018

WIRELINE COMPETITION BUREAU APPROVES THE WIRELINE AND WIRELESS COMPLIANCE PLAN OF GLOBAL CONNECTION

WC Docket Nos. 09-197, 11-42

The Wireline Competition Bureau (Bureau) hereby approves the joint wireline and wireless compliance plan¹ of Global Connection, Inc. of America, (Global Connection) filed pursuant to the requirements for the continued provision of Lifeline service.²

The Act provides that a carrier be designated as an eligible telecommunications carrier (ETC) to receive universal service support.³ The Commission has required that all telecommunications carriers seeking Lifeline-only ETC designation must meet 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 its obligations.⁴

The Bureau has clarified that any transfer of ownership or control of an ETC with an approved Lifeline compliance plan requires Commission approval in advance of the transaction.⁵ This includes renewing compliance plan approval for changes in the corporate ownership and control of the ETC.⁶

In accordance with this requirement, Global Connection submitted an amended compliance plan for both its wireline and wireless Lifeline services for Bureau approval.⁷ Global Connection has previously-approved wireline and wireless compliance plans⁸ and currently provides resold wireline

¹ See Global Connection Inc. of America Revised Wireline and Wireless Compliance Plan, WC Docket No. 09-197, 11-42 (filed Apr. 16, 2018) (*Global Connection Compliance Plan*).

² See *Lifeline and Link Up Reform and Modernization et al*, 27 FCC Rcd 6656, 6816, paras. 379-380 (2012) (*2012 Lifeline Reform Order*); *In the Matter of Lifeline & Link Up Reform & Modernization*, 30 FCC Rcd 7818 (2015) (*2015 Lifeline Order*).

³ 47 U.S.C. § 214(e)(1)(A).

⁴ See *2012 Lifeline Reform Order*, 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).

⁵ *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Universal Service Support*, Public Notice, 29 FCC Rcd 9144, 9145 (WCB 2014) (*2014 ETC Public Notice*).

⁶ *Id.*

⁷ See *Global Connection Compliance Plan*.

⁸ See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom, and Total Call*, Public Notice, 27 FCC Rcd 5776 (WCB 2012); *Wireline Competition Bureau Approves the Wireline Compliance Plans of*

Lifeline service in twenty-six states and wireless Lifeline service in twenty-six states and territories.⁹ Global Connection is a wholly-owned subsidiary of Global Connection Holdings Corporation (Global Holdings).¹⁰ Odin Mobile LLC has entered into a purchase agreement to acquire a majority ownership interest in Global Holdings.¹¹ Pursuant to the terms of the agreement, Odin Mobile will acquire 75 percent of Global Holdings' stock.¹² Global Holdings will retain the remaining minority ownership interest.¹³

The Bureau has reviewed Global Connection's combined wireline and wireless compliance plan for conformance with the relevant requirements, and now approves the compliance plan. We note that with respect to this matter, Global Connection will remain the only entity with an approved compliance plan. Additionally, Global Connection must continue to comply with any future additions to or amendments of the Lifeline program rules unless it has relinquished its relevant designation(s) pursuant to section 214(e)(4) of the Act.

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 Christian Hoefly, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-3607.

- FCC -

(Continued from previous page) _____
Global Connection and Phone Club Corporation, Public Notice, 31 FCC Rcd 8860 (WCB 2016).

⁹ *Global Connection Compliance Plan*, at 3. The twenty-six wireline states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. The twenty-six wireless states and territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

¹⁰ *Global Connection Compliance Plan*, at 3.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

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AFFILIATE OFFICE
MUMBAI, INDIA

April 16, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Revised Wireless and Wireline
Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On February 22, 2017, Global Connection Inc. of America (Global Connection or Company) submitted for approval from the Wireline Competition Bureau (Bureau) an Amended Compliance Plan for both its wireline¹ and wireless² Lifeline services. Pursuant to discussions with Bureau staff, Global Connection hereby submits a revised version of its pending Amended Compliance Plan, updating the information provided therein to reflect the passage of time.

Current Wireless and Wireline Operations

As discussed in the Amended Compliance Plan, Global Connection currently provides

¹ The Company has an approved wireline Compliance plan, originally filed on June 26, 2012 and most recently revised on July 14, 2016. The Bureau approved Global Connection's wireline Compliance Plan on August 10, 2016. See *Wireline Competition Bureau Approves the Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 16-905 (rel. Aug. 10, 2016).

² The Company has an approved wireless Compliance Plan, originally filed on March 8, 2012 and most recently revised on April 30, 2012. The Bureau approved Global Connection's wireless Compliance Plan on May 25, 2012. See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

Marlene H. Dortch, Secretary
April 16, 2018
Page Two

wireless service in twenty-six (26) territories and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states. The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states, and on a wireless basis in all twenty-six (26) of its wireless service state territories.

Compliance Plan Updates Due to the Passage of Time

The proposed Amended Compliance Plan has been revised to update the details of Global Connection's wireline and wireless operations and Lifeline ETC designations (*see pp. 3-4*), customer service contact information (*see p. 13*) and financial and technical capability (*see pp. 26-31*). It also incorporates revisions to Company procedures and commitments throughout to reflect recent changes to Lifeline program rules. Global Connection provides updates regarding its handset policies (*see pp. 6-7*), its enrollment process, including changes to reflect enrollments using the National Verifier where available (*see pp. 7, 9, 10, 17*), explains its rolling annual recertification process (*see pp. 17-18*) and provides updates regarding means to ensure compliance with the one-per-household requirement (*see pp. 20-21*). In addition, the Amended Compliance Plan provides the Company's current wireline and wireless Lifeline service plan options (*see pp. 24-26*). Current exhibit materials for the Company's wireless and wireline Lifeline operations (sample enrollment forms, income eligibility worksheets, one-per-household worksheets, and marketing materials) are included.

Global Connection hereby submits its proposed Amended Compliance Plan with the above-described revisions. The Company respectfully reiterates its request for expeditious approval of its Amended Compliance Plan in order to ensure continued provision of wireline and wireless Lifeline services as discussed herein.

This letter and revised Amended Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 16, 2018
Page Three

Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Ryan Palmer
Jodie Griffin

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plan outlining the measures it will take to comply with the Federal Communications Commission’s (“Commission’s” or “FCC’s”) Lifeline rules and implement the conditions imposed by the Commission in its Lifeline program rules and implementing orders and guidance.² On March 8, 2012, Global Connection filed a Compliance Plan

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its holding company as Global Connection Holdings Corporation (“Global Holdings”). Global Connection has no separate operating companies and no affiliates. Following the change in Global Connection’s majority ownership proposed herein, the Company’s corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies. Following the change in majority ownership, Global Connection will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless discussed in detail in Section III herein and Cintex Wireless, LLC, a Maryland limited liability company providing Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and wholesale wireless communications services.

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“2012

for its wireless service. Global Connection's wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.³ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on July 14, 2016. Global Connection's wireline Compliance Plan was approved by the Wireline Competition Bureau ("Bureau") on August 10, 2016.⁴ On February 22, 2017, Global Connection filed a revised wireless Compliance Plan to reflect a proposed change in ownership of the Company, include Global Connection's wireline Lifeline services, and otherwise update the information provided therein. Global Connection files this revised Compliance Plan to further update the information provided herein due to the passage of time.⁵

Lifeline Reform Order"). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) ("*Compliance Plan Public Notice*"). See also *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) ("*2015 Lifeline Order*"); *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*2016 Lifeline Modernization Order*"); *Bridging the Digital Divide for Low-Income Consumers Lifeline and Link Up Reform and Modernization Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (2017) ("*2017 Lifeline Digital Divide Order*").

³ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

⁴ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

⁵ Global Connection also has a Petition for Eligible Telecommunications Carrier ("ETC") Designation in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia ("ETC Petition") pending at the Commission. See *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia* ("ETC Petition") WC Docket No. 09-197, filed April 4, 2012. This ETC Petition was subsequently amended on February 26, 2013 to update it in light of the Commission's rule changes affecting Lifeline-only ETCs. Global

Global Connection provides wireless service in twenty-six (26) territories⁶ and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states.⁷ The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states,⁸ and on a wireless basis in all twenty-six (26) of its wireless service territories.

Change in Ownership of Global Connection

As noted above, Global Connection is currently wholly-owned by Global Holdings. As described in Section III below, Global Holdings, Global Connection and Odin Mobile, LLC (“Odin Mobile”) have entered into an agreement pursuant to which Odin Mobile will acquire seventy five percent (75%) of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the majority interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority direct interest in Global Connection (twenty five percent (25%)). The transaction will not result in any loss or impairment of service for any customer.

Connection still seeks Lifeline-only designation for which the Commission is the proper designating authority, because the states lack the authority to perform such designation for wireless telecommunications service providers seeking designation.

⁶ Those twenty-six territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁷ Those twenty-six states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁸ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.⁹

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order and 2016 Lifeline Modernization Order, as well as with the Commission's Lifeline rules and policies more generally.¹⁰ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the Lifeline program rules and orders, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

⁹ See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹⁰ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

ACCESS TO 911 AND E911 SERVICES¹¹

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company:

(1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹² The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services. The Company will provide its wireless Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all of the Company's wireless customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining. All of the Company's wireline customers will have available access to emergency calling services at the time that Lifeline service is initiated. This 911 and E911 access will be available to those using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint, Verizon Wireless, AT&T and T-Mobile as its underlying network providers/carriers for its wireless services and AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers

¹¹ See Compliance Plan Public Notice at 3.

¹² See 2012 Lifeline Reform Order ¶ 373.

route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

For the Company's wireless service, to the extent that Global Connection's underlying providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. For the Company's wireless voice telephony service, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection's handsets provided in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models provided meet all 911 and E911 requirements. As a result, any existing wireless customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in Global Connection's Lifeline voice telephony service can choose to use their own device or receive one from Global Connection, which will be 911/E911-compliant. As discussed above, this requirement does not apply to Global Connection's wireline services.

To further obtain the benefits of a modernized Lifeline program, the 2016 Lifeline Modernization Order also set forth the requirement that Lifeline providers providing both mobile broadband services and devices to their consumers provide handset devices that are Wi-Fi enabled.¹³ The Commission further requires such providers to offer the choice to Lifeline customers of devices

¹³ See 2016 Lifeline Modernization Order ¶ 366.

that are equipped with hotspot functionality.¹⁴ Pursuant to the Lifeline rules, Global Connection will provide handset devices that are Wi-Fi enabled as well as the choice to consumers to acquire devices that are equipped with hotspot functionality as outlined in the 2016 Lifeline Modernization Order.¹⁵

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁶

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as amended by and through the 2016 Lifeline Modernization Order, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC. Applicants in states where the National Verifier is available will be enrolled after their eligibility has been determined by the National Verifier.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below one hundred-thirty five percent (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 sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database ("NLAD"), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

¹⁴ *See id.* The 2016 Lifeline Modernization Order clarifies that the requirement to provide Wi-Fi-enabled handsets does not apply to Global Connection devices provided prior to the effective date of the rule (December 2, 2016).

¹⁵ *See* 2016 Lifeline Modernization Order ¶ 378. *See also* 47 C.F.R. § 54.408(f).

¹⁶ *See* Compliance Plan Public Notice at 3.

B. Eligibility Determination

For both wireless and wireline Lifeline services, customers can enroll in person by calling Global Connection's customer service center or online. For the Company's wireless service, more than ninety percent (90%) of customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet.

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (“TPIV”) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state or federal eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately forty percent (40%) of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly five hundred (500) active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁷

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁸ and the address is checked

¹⁷ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

¹⁸ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the 2015 Lifeline Order. *See* 2015 Lifeline Order ¶ 224, *supra* n. 2.

against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.¹⁹

All agents enrolling Lifeline customers for Global Connection have a portal login, which tracks the agent's activities²⁰ and allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers may also complete the Certification form through our Lifeline Interactive Voice Response Line and following the prompts. Customers will either fax, email or mail a copy of their eligibility proof and copy of government-issued identification.

Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility and government-issued identification.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification

¹⁹ See *infra* Section I.F. regarding use of the NLAD.

²⁰ Global Connection fully supports USAC's efforts to register agents for tracking in the NLAD and the National Verifier.

requirements in the Commission's rules and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases (including the National Verifier, once in place), Company personnel, who are non-commissioned employees, will collect documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal income-based and/or program-based criteria set forth in 47 C.F.R. § 54.409. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules. A Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on a request for reimbursement.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² In the absence of the National Verifier or a state eligibility database, acceptable documentation of program eligibility as defined by the Lifeline rules is reviewed by a Global Connection employee during the electronic order process. Acceptable documentation of program eligibility includes: (1) the current or prior year's

²¹ See 2012 Lifeline Reform Order ¶ 100; 2016 Lifeline Modernization Order ¶ 416. 47 C.F.R § 54.410(b)(1)(i)(B), 47 C.F.R § 54.410(c)(1)(i)(B).

²² See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

statement of benefits from a qualifying assistance program; (2) a notice or letter of participation in a qualifying assistance 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 demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.²³

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months' time.²⁴ If the prospective subscriber presents the Company 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.²⁵

Company personnel will examine this documentation for each Lifeline applicant, and comply with the requirement to retain and protect proof of eligibility.²⁶ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection. In the event that

²³ See 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

²⁴ See 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See *id.*

²⁶ See 2015 Lifeline Order ¶ 224 *supra* n. 2; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁷

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[I]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁸ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a non-commissioned Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on a request for reimbursement. The Company will therefore always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the

²⁷ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, FCC 05-165, ¶ 19 (2005).

²⁸ 2012 Lifeline Reform Order ¶ 110.

subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber thirty (30) days to demonstrate continued eligibility.²⁹ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

As required by the Commission's rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two (2) business days.³⁰ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-331-1059 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7 PM Eastern, Monday through Friday, and 10 AM to 2 PM Eastern on Saturday, excluding holidays.

C. Subscriber Certifications for Enrollment

Global Connection has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Commission's Lifeline rules, together with any additional state certification requirements.³¹ The Company shares the Commission's concern about abuse of the Lifeline program and is thus

²⁹ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³⁰ See 47 C.F.R. § 54.405(e)(5).

³¹ 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³² Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³³ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁴

Disclosures. The Company's application and certification forms will include the following disclosures: (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

³² See Model Application/Certification Forms, included as **Exhibit A**. Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form by July 1, 2018. See *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018) ("*Lifeline Form Public Notice*"). See also Compliance Plan Public Notice at 3.

³³ See Income Eligibility Worksheets, included as **Exhibit B**. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

³⁴ See 2012 Lifeline Reform Order ¶ 123.

Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.³⁵

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.³⁶

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁷); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁸

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to initial his or her acknowledgement, individually and under penalty of perjury, in

³⁵ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁶ See 47 C.F.R. § 54.405(c).

³⁷ See 2012 Lifeline Reform Order ¶ 87.

³⁸ See 47 C.F.R. § 54.410(d)(2).

writing or by electronic signature or interactive voice response recording,³⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company 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 applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within thirty (30) days; (5) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (6) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (7) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (8) the applicant acknowledges that the applicant may 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 the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴⁰ The applicant must also

³⁹ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.⁴¹

D. Annual Verification Procedures

Global Connection re-certifies all subscribers within 12 months after the subscriber's service initiation date and within every 12 months thereafter, except for subscribers in states where the National Verifier, state Lifeline administrator, or other state agency is responsible for the annual re-certification of subscribers' Lifeline eligibility in accordance with section 54.410(f). If the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases containing information regarding enrollment in qualifying assistance programs, then the Company obtains a signed certification from the subscriber on a form that meets the certification requirements in section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.⁴² Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.⁴³ By July 1, 2018, Global Connection will use the standardized form to re-certify a qualifying low-income consumer.⁴⁴

⁴¹ See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

⁴² See 2012 Lifeline Reform Order ¶ 120.

⁴³ See 2012 Lifeline Reform Order ¶ 145.

⁴⁴ See Lifeline Form Public Notice.

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within sixty (60) days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the sixty (60) days, the Company de-enrolls the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.⁴⁶

E. Activation and Non-Usage

For the Company's wireless Lifeline service, Global Connection will not consider a wireless prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.⁴⁷ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

⁴⁵ See revised 47 C.F.R. § 54.54.405(e)(4).

⁴⁶ Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

⁴⁷ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.407(c)(1).

In addition, after service activation, Global Connection will not seek reimbursement from the USF for and will de-enroll any subscriber that has not used Global Connection's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days or during the notice period set forth in 47 C.F.R. 54.405(e)(3), currently a period of 15 days. In accordance with 47 C.F.R. § 54.405(e)(3), Global Connection will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Global Connection will update the NLAD within one (1) business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

Global Connection's wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁴⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to

⁴⁸ See 2012 Lifeline Reform Order at ¶ 257; see also 47 C.F.R. §§ 54.404(b)(10) and 54.405(e)(3), respectively.

⁴⁹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

National Lifeline Accountability Database (NLAD). The Company complies with the requirements of the NLAD and section 54.404 of the Commission’s rules. As such, the Company queries the NLAD for every enrollment⁵⁰ to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁵¹

In addition to checking the NLAD, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every ninety (90) days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵²

⁵⁰ With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵¹ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber’s information in the NLAD within ten (10) business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

⁵² A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An

through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written document based on a USAC form containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁵⁴

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that

"economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵³ See 2012 Lifeline Reform Order ¶ 78.

⁵⁴ *Id.* Samples of Global Connection's one-per-household worksheet are attached as **Exhibit C**. The USAC Household Worksheet is available at http://www.usac.org/res/documents/li/pdf/forms/LI_Worksheet_nonNVstates.pdf. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See Lifeline Form Public Notice.)

documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁵ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁶ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁷ Samples of the Company's marketing materials are included as **Exhibit D**. In addition, the Company's application/certification forms will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

G. Company Reimbursements from the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁸ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision

⁵⁵ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁶ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁷ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁸ See 2012 Lifeline Reform Order ¶ 128; 47 C.F.R. § 54.407(d).

of Lifeline support.⁵⁹ In addition, the Company will keep accurate records as directed by USAC⁶⁰ and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, providing the Company's business and affiliate information, terms and conditions of any voice telephony plans offered to Lifeline subscribers, and all other required information and certifications.⁶¹ The Company also submits an annual Form 555 filing to the Commission certifying, under penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) that the Company is in compliance with all federal Lifeline certification procedures; and (3) that the Company is in compliance with the minimum service levels set forth in 47 C.F.R. §54.408.⁶² The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, as amended, annually by January 31st, for its re-certification efforts of the previous year.⁶³

⁵⁹ See 47 C.F.R. § 54.407(a). Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶⁰ See 47 C.F.R. § 54.407(e).

⁶¹ See 47 C.F.R. § 54.422.

⁶² See 47 C.F.R. § 54.416(a).

⁶³ See 47 C.F.R. § 54.416(b).

II. Description of Lifeline Service Offerings⁶⁴

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁵ and throughout the coverage area of its respective, underlying provider(s). Global Connection's Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408.

Global Connection has revised its Lifeline plans as of December 1, 2017 to comply with the applicable minimum standards set by the Commission. The Company's current wireless Lifeline offering consists of the following plan options:

Plan Name¹	Voice Minutes Included in Plan	SMS Messages Included in Plan	Data MB Included in Plan	Voicemail Caller ID Call Waiting	Nationwide Long Distance Included	Cost Per Month
StandUP 1 GB Data	500	Unlimited ²	1 GB	YES	YES	Free
StandUP Basic	750	Unlimited ²	100 MB	YES	YES	Free

* 1 Text = 1 Minute

¹ Plan availability based on subscriber's state of residence; not available in CA or NE. Visit www.StandUPwireless.com or call 1-800-544-4441 for more information.

² Stated pricing for service options do not include applicable state, federal and local taxes and surcharges.

In addition to allotments of voice, text and broadband services, Global Connection's current wireless Lifeline offering includes a free handset and access to custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes, currently in the following increments:

⁶⁴ See Compliance Plan Public Notice at 3.

⁶⁵ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

Direct Payment Retail Price	Total Credits Provided	Credits per Nationwide Call Minute	Credits per SMS Text Message
\$5	200	1	1
\$10	450	1	1
\$20	1000	1	1
\$30	1500	1	1
\$50	2500	1	1

Additional Data Plans	Total MB Credits Provided
\$3.95	250 MB
\$7.95	500 MB
\$15.95	1 GB

Airtime “top-up” minutes are available for purchase through customer service and on its website. Additional information regarding the Company’s wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company’s wireline Lifeline offerings vary based on the Company’s underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and offers a Lifeline-discounted Basic Package⁶⁶ for \$20.70,⁶⁷ an Advantage Package⁶⁸ for \$25.70 and a Premium Package⁶⁹ for \$30.70 to eligible Lifeline customers. Global Connection resells CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁰ for \$32.95 and an Advantage Package⁷¹ for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia and North

⁶⁶ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁶⁷ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁶⁸ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁶⁹ The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷⁰ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

Carolina, and offers a Lifeline-discounted Basic Package⁷² for \$36.70 and an Advantage Package⁷³ for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁴ for \$36.70 and an Advantage Package⁷⁵ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any wireline service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website www.ConnectWithGlobal.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁶

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. § 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷⁷ Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

⁷² The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷³ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁴ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁵ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁶ See Compliance Plan Public Notice at 3.

⁷⁷ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services which represent the majority of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In addition, Global Connection has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to Global Connection through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement ("Agreement") dated February 16, 2017, by and among Odin Mobile, Global Holdings and Global Connection, Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary. A majority (ninety-nine percent (99%) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁷⁸ Global Connection customers will continue to receive their existing services at the same or better rates, terms and conditions currently in effect.

Odin Mobile (FRN: 0022135131) is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless service, including to visually impaired consumers by using the T-Mobile USA ("T-Mobile") and Sprint wireless networks through the Mobile Virtual Network Enabler ("MVNE") Prepaid Wireless Wholesale, LLC ("PPWW"), which is owned by Paul Greene. Odin Mobile

⁷⁸ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

purchases wireless services (for voice minutes, text messages, mobile data, etc.) from PPWW, a Maryland limited liability company, on a wholesale basis, packages those services into Odin Mobile's own service plans and pricing, and bundles the wireless service with Odin Mobile's handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile currently provides wireless service in 49 states and Puerto Rico.⁷⁹ Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. Upon approval of the transaction, Odin Mobile will own 75% of Global Connection and plans to transfer all prepaid wireless operations to Global Connection.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC ("PWG"), an MVNE that supplies airtime through the T-Mobile network. PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator ("MVNO") market. PWG and PPWW have no foreign ownership and, like Global Connection, are not foreign carriers and are not affiliated with foreign carriers in any market. PWG is one of the nation's longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

⁷⁹ The only state in which Odin Mobile does not offer service is Alaska.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are inter-connected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator. Specifically, PWG’s network infrastructure and T-Mobile relationship enables PWG to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier’s ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.⁸⁰ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has

⁸⁰ Mr. Greene also owns interest in several other non-communications-related businesses.

held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of Global Connection's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸¹ Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸² Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸³ Global Connection's Lifeline

⁸¹ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit E**.

⁸² Compliance Plan Public Notice at 3.

⁸³ See 47 C.F.R. § 54.202(a)(1).

supported voice services will meet the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated on an annual basis. Global Connection's Lifeline supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated on an annual basis. To the extent Global Connection provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and Global Connection will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

The Company provides all of the communications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include broadband Internet access service ("BIAS"), a supported service as of December 2, 2016, as well as voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set number of minutes of use at no charge to the customer, and can be used for local and domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services and handsets (when applicable).

Finally, Global Connection will not provide toll limitation service (“TLS”) for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸⁴

The Company’s Lifeline wireline offerings include unlimited local calling and plans include prepaid long distance minutes. All wireline customers can purchase additional domestic long distance – unlimited for \$10.00, or 250 minutes for \$5.00. Wireline customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection’s long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this amended Compliance Plan is essential to allow Global Connection to consummate the ownership change as described herein, and demonstrably strengthen the Company’s operating capabilities to

⁸⁴ See 2012 Lifeline Reform Order ¶ 230.

the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



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*Attorneys for Global Connection Inc. of
America*

April 16, 2018

EXHIBIT 4

Coverage Area

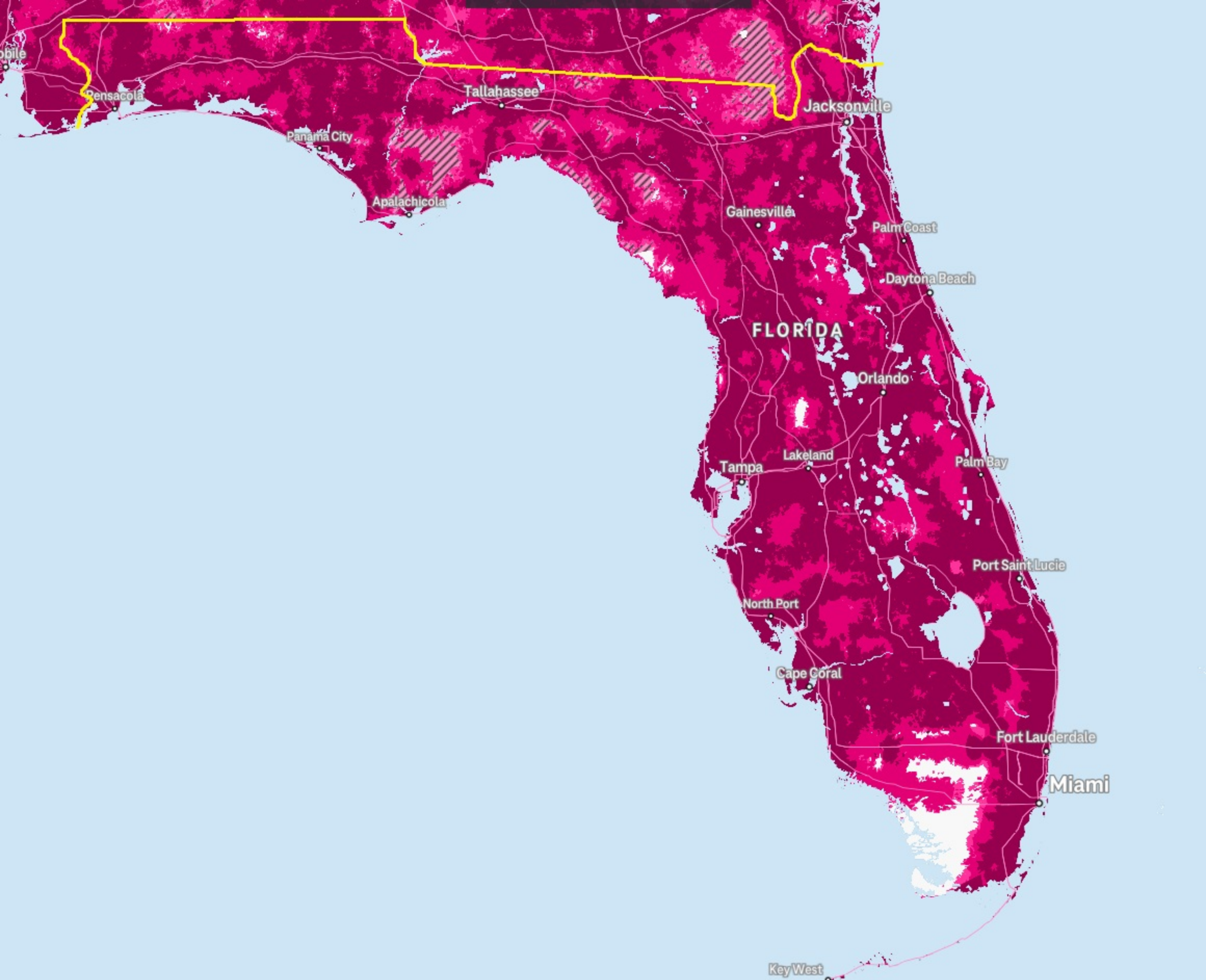


EXHIBIT 5

Sample Advertisement

Unlimited Talk, Text and Data[†]

Free every month when you bundle your Lifeline and ACP Benefits (\$40 Savings)



Tablets available for as low as \$10.01 for those that qualify.

Need Lifeline or ACP not bundled together?

Free Lifeline Only Plan Includes:

1,000 Minutes, Unlimited Text & 4.5 GB of High-Speed Data

Free ACP Only Plan Includes:

Unlimited Talk, Text and Data[†] with 5 GB of High-Speed Data

Plan Includes: Unlimited Talk, Text & 10 GB of High-Speed Data – 5G/4G LTE plus Unlimited Additional Data[†]

You can select any available service plan by signing up at standupwireless.com or you can update your existing service plan by logging into My Account at any time.

Retail Price	Price to You*	Plan
\$30	FREE	Unlimited Talk, Text & Data [†] with 5 GB of High-Speed Data
\$40	FREE	Unlimited Talk, Text & Data[†] with 10 GB of High-Speed Data
\$50	\$10	Unlimited Talk, Text & Data [†] with 12 GB of High-Speed Data
\$60	\$20	Unlimited Talk, Text & Data [†] with 16 GB of High-Speed Data
\$75	\$35	Unlimited Talk, Text & Data [†] with 25 GB of High-Speed Data
\$110	\$70	Unlimited Talk, Text & Data [†] with 60 GB of High-Speed Data

Price to You is applicable when you apply for both Lifeline and ACP. Customer signing up for ACP only will receive \$30.00 off the retail price of the rate plan.

Ask If You Qualify! standupwireless.com **1-800-544-4441**

Unresolved questions or complaints may be directed to your local Public Utilities Commission or customers in the states listed below may direct unresolved questions or complaints to the following organizations:

Colorado Public Utilities Commission: Consumer Affairs – 800-456-0858, 303-894-8070

Georgia Public Service Commission: Consumer Affairs – 800-282-5813, 404-656-4501

Pennsylvania Utility Commission Bureau of Consumer Services – 800-692-7380 or for FDD PA Relay Center 800-682-8706 (voice) or 800-682-8786 (TTY)

Kansas Commission's Office of Public Affairs and Consumer Protection – 800-662-0027 or 785-271-3140, TD 800-766-3777

Massachusetts Consumer Divisions Department of Telecommunications & Cable – 800-392-6066 or 617-305-3531

[†]After monthly allotted 5G/4G LTE data, next 20 GBs at 512 kbps, and remaining data at 128 kbps. Video typically streams in SD (480p). Lower speeds may affect audio and video streaming, access to certain websites and content, or the use of available applications. 5G access requires a 5G-capable device. 5G is not available in all areas. Data usage is subject to our Acceptable Use Policy (AUP). After 55 GBs of data usage in a month, data service will be placed on hold to confirm usage complies with AUP; customers using data consistent with AUP may receive unlimited additional data in 10 GBs increments for the rest of the month by contacting Customer Care. Available speeds will be determined by your particular service plan and may depend on other factors, including your device and network availability. For additional information about broadband speeds, including network limitations and our AUP, visit www.standupwireless.com/broadband. Promotional offers may be modified or withdrawn at any time. Taxes and fees included. Visit www.standupwireless.com for complete terms and conditions.

This is a Lifeline and Affordable Connectivity Program (ACP) supported service. Lifeline and the ACP are separate federal government assistance programs operated by the FCC. Lifeline benefits may be combined with ACP benefits and applied to the same service plan or different service plans. Lifeline and ACP services may be obtained from different service providers. Eligibility for Lifeline and ACP is based on income or participation in certain government benefit programs and is determined by the National Verifier (documentation may be required). Promotional FREE service offer is subject to eligibility, and you must be eligible to be enrolled in either program. Lifeline benefits are non-transferable and limited to one per household (wireless or wireline). An eligible ACP household is limited to one monthly service discount and a single one-time device discount. Connected device benefits require a co-pay of \$10.01. For more information on available devices, visit www.standupwireless.com/support/devices/. Monthly ACP service benefits may be transferred to another provider subject to applicable regulatory restrictions. For Lifeline and ACP eligibility criteria, applicable terms & conditions, and more information about the different programs, call us at 1-800-544-4441 or visit www.standupwireless.com. When the ACP ends or your household is no longer eligible, customers will be subject to our regular undiscounted rates. To enroll in Lifeline only, ACP only or a service plan that includes both Lifeline and ACP discounts, visit us at www.standupwireless.com. Lifeline plans include 1,000 Minutes, Unlimited Text and 4.5 GB of data. A complete listing of our plans, including plans that are fully covered (no co-pay after application of the ACP discount), is available at www.standupwireless.com/acp/plans. Offers may vary by state and service may not be available in all areas. Service provided by Global Connection Inc. of America d/b/a StandUp Wireless.

Llamadas, Textos y Datos Ilimitados[†]

Gratis cada mes cuando combina sus beneficios de Lifeline y ACP (ahorro de \$40)



Tabletas disponibles por tan solo \$ 10.01 para aquellos que califican.

¿Necesita Lifeline solamente o ACP solamente?

El plan gratis de Lifeline solamente incluye:

1,000 Minutos, Textos Ilimitados y 4.5 GB de Datos de alta velocidad

El plan gratis de ACP solamente incluye:

Llamadas, Textos y Datos[†] Ilimitados con 5GB de Datos de alta velocidad

El plan incluye: Llamadas y Textos Ilimitados y 10 GB de Datos de alta velocidad – 5G/4G LTE más Datos Ilimitados Adicionales[†]

Puede seleccionar cualquier plan de servicio disponible registrándose en www.standupwireless.com o puede actualizar su plan de servicio existente iniciando sesión en My Account en cualquier momento.

Precio al por Menor	Precio para Usted*	Plan
\$30	GRATIS	Llamadas, Textos y Datos [†] Ilimitados con 5 GB de Datos de Alta Velocidad
\$40	GRATIS <small>MEJOR VALOR</small>	Llamadas, Textos y Datos[†] Ilimitados con 10 GB de Datos de Alta Velocidad
\$50	\$10	Llamadas, Textos y Datos [†] Ilimitados con 12 GB de Datos de Alta Velocidad
\$60	\$20	Llamadas, Textos y Datos [†] Ilimitados con 16 GB de Datos de Alta Velocidad
\$75	\$35	Llamadas, Textos y Datos [†] Ilimitados con 25 GB de Datos de Alta Velocidad
\$110	\$70	Llamadas, Textos y Datos [†] Ilimitados con 60 GB de Datos de Alta Velocidad

El Precio para Usted se aplica cuando solicita Lifeline y ACP. El cliente que se registre solo en ACP recibirá \$30 de descuento en el precio minorista del plan.

Pregunte si Califica! standupwireless.com 1-800-544-4441

Las preguntas o quejas no resueltas pueden dirigirse a la Comisión de Servicios Públicos o los clientes en los estados que se enumeran a continuación pueden dirigir preguntas o quejas no resueltas a las siguientes organizaciones:

Comisión de Servicios Públicos de Colorado: Asuntos del Consumidor - 800-456-0858, 303-894-8070

Comisión de Servicios Públicos de Georgia: Asuntos del Consumidor - 800-282-5813, 404-656-4501

Oficina de Servicios al Consumidor de la Comisión de Servicios Públicos de Pensilvania: 800-692-7380 o para el Centro de retransmisión PA de FDD 800-682-8706 (voz) o 800-682-8786 (TTY)

Oficina de Asuntos Públicos y Protección al Consumidor de la Comisión de Kansas: 800-662-0027 o 785-271-3140, TD 800-766-3777

Departamento de Telecomunicaciones y Cable de las Divisiones de Consumidores de Massachusetts - 800-392-6066 o 617-305-3531

[†] Después de los datos 5G/4G LTE asignados mensualmente, los siguientes 20 GB a 512 kbps y los datos restantes a 128 kbps. El video generalmente se transmite en SD (480p). Las velocidades más bajas pueden afectar la transmisión de audio y video, el acceso a ciertos sitios web y contenido, o el uso de aplicaciones disponibles. El acceso 5G requiere un dispositivo compatible con 5G. 5G no está disponible en todas las áreas. El uso de datos está sujeto a nuestra Política de uso aceptable (AUP). Después del uso de 55 GB de datos en un mes, el servicio de datos se suspenderá para confirmar que el uso cumple con AUP; los clientes que usan datos consistentes con AUP pueden recibir datos adicionales ilimitados en incrementos de 10 GB durante el resto del mes comunicándose con Atención al cliente. Las velocidades disponibles estarán determinadas por su plan de servicio particular y pueden depender de otros factores, incluidos su dispositivo y la disponibilidad de la red. Para obtener información adicional sobre las velocidades de banda ancha, incluidas las limitaciones de la red y nuestra AUP, visite www.standupwireless.com/broadbandTD. Las ofertas promocionales pueden modificarse o retirarse en cualquier momento. Impuestos y tasas incluidos. Visite www.standupwireless.com para conocer los términos y condiciones completos.

Este es un servicio respaldado por Lifeline y el Programa de Descuentos para Internet (ACP). Lifeline y ACP son programas independientes de asistencia del gobierno federal operados por la FCC. Los beneficios de Lifeline pueden combinarse con los beneficios de ACP y aplicarse al mismo plan de servicio o a diferentes planes de servicio. Los servicios de Lifeline y ACP se pueden obtener de diferentes proveedores de servicios. La elegibilidad para Lifeline y ACP se basa en los ingresos o la participación en ciertos programas de beneficios del gobierno y la determina el Verificador Nacional (es posible que se requiera documentación). La oferta de servicio promocional GRATIS está sujeta a elegibilidad, y usted debe ser elegible para inscribirse en cualquiera de los programas. Los beneficios de Lifeline no son transferibles y están limitados a uno por hogar (inalámbrico o fijo). Un hogar ACP elegible está limitado a un descuento de servicio mensual y un descuento de dispositivo único. Los beneficios de dispositivos conectados requieren un copago de \$10.01. Para obtener más información sobre los dispositivos disponibles, visite www.standupwireless.com/support/devices/. Los beneficios del servicio ACP mensual pueden transferirse a otro proveedor sujeto a las restricciones reglamentarias aplicables. Para los criterios de elegibilidad de Lifeline y ACP, los términos y condiciones aplicables y más información sobre los diferentes programas, llámenos al 1-800-544-4441 o visite www.standupwireless.com. Cuando termine el ACP o su hogar ya no sea elegible, los clientes estarán sujetos a nuestras tarifas regulares sin descuento. Para inscribirse solo en Lifeline, solo en ACP o en un plan de servicio que incluye descuentos tanto en Lifeline como en ACP, visítenos en www.standupwireless.com. Los planes Lifeline incluyen 1000 minutos, mensajes de texto ilimitados y 4.5 GB de datos. Una lista completa de nuestros planes, incluidos los planes que están completamente cubiertos (sin copago después de la aplicación del descuento ACP), está disponible en www.standupwireless.com/acp/plans. Las ofertas pueden variar según el estado y es posible que el servicio no esté disponible en todas las áreas. Servicio proporcionado por Global Connection Inc. of America d/b/a StandUp Wireless.

EXHIBIT 6

Proposed Lifeline Offering

STAND UP WIRELESS LIFELINE PLANS	VOICE	TEXT (SMS)	DATA High Speed	LIFELINE PRICE	TRIBAL LIFELINE PRICE
Lifeline-Only Non-Tribal	1,000	Unlimited	4.5 GB	\$0.00	N/A
Lifeline-Only Tribal	Unlimited	Unlimited	6.5 GB	N/A	\$0.00

ADDITIONAL AIRTIME "TOP-UPS"	VOICE	TEXT (SMS)	DATA
\$5.00	250	250	250 MB
\$10.00	None	None	1.5 GB
\$10.00	Unlimited	Unlimited	1 GB
\$20.00	Unlimited	Unlimited	3 GB
\$30.00	Unlimited	Unlimited	8 GB

Top-Ups expire after 30 days

All packages include:

- Free calls to STANDUP Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card

Please also see the Company's website at www.standupwireless.com for further description of its service offerings and the Terms and Conditions of Service.

EXHIBIT 7

Key Management Bios

Jennifer Carter currently serves as STANDUPS's Chief Operating Officer and Chief Compliance Officer. Prior to this role, she served as STANDUP's Vice-President of Customer Operations and Compliance Officer. Ms. Carter has held compliance roles for two wireless Lifeline ETCs and, before moving to her role at STANDUP in 2018, was the Director of Compliance at FreedomPop where she performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company.

Jason VanArsdall serves as STANDUP's Vice President of Product Development and Government Relations. Mr. VanArsdall actively serves on the National Lifeline Association's Regulatory and Governmental Affairs Committee and champions the interests of Lifeline and the Affordable Connectivity Program at the Federal and State levels. Prior to STANDUP, Mr. VanArsdall held roles in product management for another wireless Lifeline ETC and at Cincinnati Bell. Mr. VanArsdall is a graduate of the University of Dayton with a Bachelor of Science in Business Administration.

EXHIBIT 8

Service Quality and Consumer Protection

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – the Company does not employ contracts.
4. Allow a trial service – Since Lifeline customers receive free service, there is no commitment to the service on their part. If the service does not suit their needs, they can cancel service at any time without penalty.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – the Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply. Customers can, however, cancel service at any time without penalty.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or an 800 number. These numbers are disclosed on the Company's website and in advertising and customer welcome materials.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – We promptly respond to all complaints. If a customer care representative cannot help a customer, we have an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Because the Company's service is prepaid, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, (“mobile wireless devices”) that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company’s website.
- (5) Response Time. Within two business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.