

State of Florida



# Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

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

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**DATE:** January 5, 2026

**TO:** Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

**FROM:** Samuel Day, Public Utility Analyst III, Office of Industry Development and Market Analysis *SD*

**RE:** 20240096-TP – Application for designation as an eligible telecommunications carrier in the State of Florida, by Amerimex Communications Corp. d/b/a SafetyNet Wireless.

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Attached is an amended and pending FCC compliance plan for Amerimex Communications Corp. d/b/a SafetyNet Wireless. Please add the attached document to closed Docket No. 20240096-TP. If you have any questions, please contact Samuel Day at (850) 413-6734.

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**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

**AMENDED COMPLIANCE PLAN**

**OF**

**AMERIMEX COMMUNICATIONS CORP. dba SAFETYNET WIRELESS**

AmeriMex Communications Corp. d/b/a SafetyNet Wireless (SafetyNet or the Company), by its counsel, hereby respectfully submits and requests expeditious approval of revisions to its approved Compliance Plan, outlining the measures it will take to comply with the Lifeline Program rules, orders, and guidance issued by the Federal Communications Commission (Commission or FCC).<sup>1</sup>

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<sup>1</sup> 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 Nos. 11-42 and 03-109, CC Docket No. 96-45, and WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (*2012 Lifeline Reform Order*); *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, and 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (*2015 Lifeline Order*); *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect*

On July 12, 2012, SafetyNet filed a Compliance Plan for its wireless service.<sup>2</sup> SafetyNet's Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on December 26, 2012.<sup>3</sup> SafetyNet files this revised Compliance Plan to reflect a proposed change in ownership of the Company and to update its policies and practices to account for changes in the Commission's Lifeline rules, orders, and guidance and due to the passage of time. SafetyNet is a Lifeline eligible telecommunications carrier (ETC) in twenty-six (26) states pursuant to state designations and state program authorizations: Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Tennessee, Virginia, Washington, West Virginia, and Wisconsin.

SafetyNet has availed itself of the grant of forbearance from the "own-facilities" requirement contained in section 214(e)(1)(A) of the Communications Act of 1934, as amended

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*America Fund*, WC Docket Nos. 11-42, 09-197, and 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (*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, and 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (rel. Dec. 1, 2017) (*2017 Lifeline Digital Divide 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, and 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) (*Fifth Report and Order*).

<sup>2</sup> See Compliance Plan of AmeriMex Communications Corp. d/b/a SafetyNet Wireless, WC Docket Nos. 09-197 and 11-42 (filed Jul. 12, 2012).

<sup>3</sup> *Wireline Competition Bureau Approves the Compliance Plans of Several Lifeline-Only Eligible Telecommunications Carrier Petitioners*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 12-2063 (December 26, 2012).

(Communications Act).<sup>4</sup> In accordance with the procedures established in the 2012 Lifeline Reform Order<sup>5</sup> and clarified in the Compliance Plan Public Notice issued by the Wireline Competition Bureau on February 29, 2012,<sup>6</sup> this Compliance Plan outlines the measures SafetyNet has implemented to achieve full compliance with all pertinent conditions set forth in the Commission's Lifeline rules, orders, and guidance, including the provision of 911 services to ensure that Lifeline customers can access the same safety and welfare services that are critical for all Americans.<sup>7</sup>

SafetyNet is committed to guarding against waste, fraud, and abuse in the Lifeline program. This Compliance Plan details the policies, procedures, and training programs the Company has implemented to achieve this objective. Specifically, this Compliance Plan describes in detail: (1) the measures SafetyNet takes to implement the conditions contained in the Lifeline program rules, orders, and guidance, including the procedures the Company follows to enroll eligible Tribal and non-Tribal subscribers into the Lifeline program, the process by which the Company

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<sup>4</sup> See 47 U.S.C. § 214(e)(1)(A); *2012 Lifeline Reform Order*, ¶ 368-381. Although SafetyNet qualifies for and avails itself of the Commission's grant of forbearance from the facilities requirement in 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. SafetyNet 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 SafetyNet provides service using its own facilities for purposes of a state universal service program.

<sup>5</sup> See *2012 Lifeline Reform Order*, ¶ 379.

<sup>6</sup> See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 12-314 (WCB rel. Feb. 29, 2012) (*Compliance Plan Public Notice*).

<sup>7</sup> The compliance practices described herein are subject to change consistent with program rules and as those rules may be amended, replaced, or adopted from time to time.

submits for reimbursement from the Low Income Fund for those subscribers, and how the Company conducts initial and ongoing certifications; and (2) how SafetyNet offers and markets its Lifeline services, the geographic areas in which it offers Lifeline services, and a detailed description of the Company's Lifeline service plan offerings.

## **COMPANY INFORMATION**

### **I. Change in Ownership**

SafetyNet submits this revised Compliance Plan in connection with a proposed change in ownership of the Company. Pursuant to a Stock Purchase Agreement dated December 17, 2025, Stephen D. Klein and Jeffrey Matthews (the "Purchasers") will acquire all shares of common stock currently held by Donald L. Aldridge, representing 66.67% of the issued and outstanding shares of AmeriMex Communications Corp.<sup>8</sup>

Mr. Aldridge founded the Company on July 15, 1998. Mr. Aldridge is retiring from the business and will have no continuing ownership interest or management role following consummation of the transaction.

The Purchasers are existing minority shareholders and officers of the Company. Mr. Klein has served as an executive officer of the Company since 2014, initially as President and subsequently as Chief Executive Officer. Mr. Matthews has served as Chief Technology Officer since 2014.

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<sup>8</sup> The Stock Purchase Agreement provides that consummation of the transaction is conditioned upon Bureau acceptance of this revised Compliance Plan.

Following the transaction, Mr. Klein will hold 80% and Mr. Matthews will hold 20% of the outstanding shares.

There will be no change in the Company's name, management, operations, or Lifeline service offerings as a result of the transaction. Customers will experience no interruption of service. The ownership transition represents an orderly succession from the Company's founder to its existing executive leadership.

Pre- and post-transaction organizational charts are attached as Exhibit A.

## **II. Financial and Technical Capabilities**

SafetyNet affirms that it possesses the financial and technical capability to provide Lifeline service in compliance with Commission rules, as required by 47 C.F.R. § 54.202(a)(4).<sup>9</sup>

### **A. Financial Capability**

AmeriMex Communications Corp. has been a going concern since 1998—over 26 years of continuous operation. The Company has maintained profitable operations throughout this period and does not rely exclusively on USF disbursements to operate. SafetyNet derives revenue from multiple sources, including service to non-Lifeline subscribers and ancillary services. The Company maintains adequate capital reserves to support ongoing operations, satisfy its statutory obligations, and withstand any temporary interruption in Lifeline program funding.

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<sup>9</sup> <sup>2</sup> See 2012 Lifeline Reform Order, 27 FCC Rcd at ¶ 388 (financial and technical capability factors for resale ETCs).

## **B. Technical Capability**

SafetyNet has provided Lifeline-supported wireless service continuously since Bureau approval of its original Compliance Plan in December 2012.<sup>10</sup> The Company currently holds ETC designations in twenty-six (26) states and has developed and maintained the operational infrastructure necessary to support Lifeline enrollment, subscriber management, and regulatory compliance at scale.

SafetyNet provides service on a resale basis utilizing nationwide carrier networks capable of meeting the minimum service standards established by Commission rule.<sup>11</sup> The Company maintains contractual relationships with underlying carriers sufficient to ensure service availability and reliability for Lifeline subscribers.

The Company's technical infrastructure includes systems for enrollment processing, usage monitoring, recertification management, and integration with USAC-administered databases including the National Verifier and NLAD. SafetyNet employs personnel with expertise in Lifeline program administration and telecommunications operations. Under the continued leadership of its existing management team, SafetyNet will maintain and enhance its technical capabilities to meet evolving program requirements.

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<sup>10</sup> See *Wireline Competition Bureau Approves the Compliance Plans of Several Lifeline-Only Eligible Telecommunications Carrier Petitioners*, Public Notice, DA 12-2063 (December 26, 2012).

<sup>11</sup> See 47 C.F.R. § 54.408.

SafetyNet has not been subject to ETC revocation or enforcement action by the Commission. The Company has operated pursuant to a Bureau-approved compliance plan since 2012 without adverse audit finding.<sup>12</sup>

### **ACCESS TO 911/E911 SERVICES**

SafetyNet complies with the Commission's requirements regarding access to 911 and E911 services for Lifeline subscribers. In the *2012 Lifeline Reform Order*, the Commission conditioned forbearance from the facilities requirement on, among other things, compliance with certain 911 and E911 obligations.<sup>13</sup>

SafetyNet ensures that all Lifeline subscribers have access to 911 and E911 services to the same extent that such services are available to other subscribers of the underlying carrier's network.<sup>14</sup> Lifeline service includes access to emergency calling regardless of whether the subscriber has available minutes or account balance, and regardless of activation status.<sup>15</sup>

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<sup>12</sup> The Company previously disclosed to the Bureau factual information regarding a Wisconsin matter that did not result in enforcement action against SafetyNet. That disclosure is incorporated herein by reference.

<sup>13</sup> See *2012 Lifeline Reform Order*, 27 FCC Rcd at ¶ 373.

<sup>14</sup> See 47 C.F.R. § 54.101(a)(1) (voice telephony service must provide access to emergency services).

<sup>15</sup> See *2012 Lifeline Reform Order*, 27 FCC Rcd at ¶ 373 ("access to 911 and E911 services regardless of activation status and availability of minutes").



The Company provides handsets that are E911-compliant and compatible with the emergency calling capabilities of the underlying carrier network.<sup>16</sup> SafetyNet will replace, at no charge to the subscriber, any handset that is not capable of accessing E911 services.

SafetyNet's underlying carrier agreements ensure that emergency calls placed by Lifeline subscribers are routed to the appropriate Public Safety Answering Point (PSAP) in the same manner as calls from other wireless subscribers on the carrier's network.<sup>17</sup> The Company's Lifeline service provides the same 911/E911 functionality available to non-Lifeline customers of the underlying carrier.<sup>18</sup>

## **COMPLIANCE PLAN**

### **I. Procedures for Enrolling and Maintaining Subscribers in the Lifeline Program**

#### **A. Policy**

SafetyNet is committed to full compliance with the Commission's Lifeline program rules, orders, and guidance as they exist at any given time. The Company's enrollment and subscriber management practices are designed to ensure that only eligible consumers receive Lifeline-supported service and that all program integrity requirements are satisfied.

SafetyNet utilizes the Universal Service Administrative Company (USAC) systems designated for Lifeline program administration, including the National Verifier for eligibility determinations

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<sup>16</sup> *See id.*

<sup>17</sup> *See* 47 C.F.R. Part 9 (911 requirements).

<sup>18</sup> 47 C.F.R. § 54.408(c) (Bureau updates standards by Public Notice).

and the National Lifeline Accountability Database (NLAD) for subscriber management and duplicate prevention.<sup>19</sup> The Company's policies and procedures are subject to modification as Commission rules, USAC guidance, or program requirements are updated.

## **B. Eligibility Determination**

SafetyNet conducts all eligibility determinations through the National Verifier in accordance with 47 C.F.R. § 54.410.<sup>20</sup> The Company does not make independent eligibility determinations outside the National Verifier system.

Prospective subscribers may demonstrate eligibility through program-based criteria or income-based criteria as established by Commission rule.<sup>21</sup> SafetyNet accepts eligibility determinations made by the National Verifier, including determinations based on automated database checks and manual document review conducted by USAC.

For subscribers residing on Tribal lands, SafetyNet follows the eligibility criteria and enhanced support provisions set forth in 47 C.F.R. § 54.409(a) and § 54.403(a)(3).<sup>22</sup>

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<sup>19</sup> See 47 C.F.R. § 54.404 (NLAD); 47 C.F.R. § 54.410 (National Verifier); *2016 Lifeline Modernization Order*, ¶¶ 126-167.

<sup>20</sup> 47 C.F.R. § 54.410(b)-(c).

<sup>21</sup> See 47 C.F.R. § 54.409(a) (program-based eligibility); 47 C.F.R. § 54.409(b) (income-based eligibility).

<sup>22</sup> 47 C.F.R. § 54.409(a)(3) (Tribal-specific qualifying programs); 47 C.F.R. § 54.403(a)(3) (enhanced Tribal support).

### **C. Subscriber Disclosures and Certifications**

SafetyNet obtains all subscriber certifications required by 47 C.F.R. § 54.410 prior to enrolling a consumer in the Lifeline program.<sup>23</sup> Required certifications are collected through the National Verifier or through compliant processes consistent with applicable Commission rules and the E-SIGN Act (15 U.S.C. § 7001 et seq.).<sup>24</sup>

Prior to enrollment, SafetyNet provides consumers with disclosures regarding the Lifeline program consistent with 47 C.F.R. § 54.405, including information concerning the one-per-household limitation on Lifeline benefits,<sup>25</sup> subscriber obligations to notify the Company of changes affecting eligibility, the prohibition on transfer of Lifeline benefits, recertification requirements, and de-enrollment procedures.<sup>26</sup>

Where a consumer seeks to enroll in Lifeline at an address served by another Lifeline provider, SafetyNet follows the procedures established by Commission rule and USAC guidance for resolution of duplicate address situations, including use of the Household Worksheet where applicable.<sup>27</sup>

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<sup>23</sup> 47 C.F.R. § 54.410(d).

<sup>24</sup> 47 C.F.R. § 54.419; 15 U.S.C. § 7001 et seq.

<sup>25</sup> 47 C.F.R. § 54.409(c).

<sup>26</sup> See 47 C.F.R. § 54.405(c) (required disclosures); 47 C.F.R. § 54.410(d) (subscriber certifications).

<sup>27</sup> 47 C.F.R. § 54.410(g) (Household Worksheet).

#### **D. Oversight and Training of Employees, Agents, and Representatives**

All SafetyNet personnel and authorized representatives who participate in Lifeline enrollment activities are registered in the Representative Accountability Database (RAD) administered by USAC and maintain valid RAD identification prior to conducting any enrollment transaction, as required by 47 C.F.R. § 54.406(a).<sup>28</sup>

SafetyNet provides training to all personnel and agents involved in Lifeline enrollment on applicable Commission rules and USAC guidance prior to their participation in enrollment activities. Training content is updated as program requirements evolve.<sup>29</sup>

The Company does not provide commissions, bonuses, or other compensation to employees or agents that is based on the number of consumers enrolled in Lifeline, consistent with 47 C.F.R. § 54.406(b).<sup>30</sup>

SafetyNet maintains oversight procedures to monitor enrollment activity. Where non-compliant conduct is identified, the Company takes appropriate corrective action consistent with its obligations under Commission rules and USAC guidance.<sup>31</sup>

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<sup>28</sup> 47 C.F.R. § 54.406(a).

<sup>29</sup> See 2012 Lifeline Reform Order, ¶ 389.

<sup>30</sup> 47 C.F.R. § 54.406(b).

<sup>31</sup> See 47 C.F.R. § 54.417 (recordkeeping requirements).

### **E. Activation and Usage of Lifeline Service**

SafetyNet activates Lifeline service for enrolled subscribers consistent with 47 C.F.R. § 54.407.<sup>32</sup>

The Company monitors subscriber usage and complies with the non-usage requirements set forth in 47 C.F.R. § 54.407(c)(2).<sup>33</sup>

SafetyNet does not claim reimbursement for any subscriber who has not demonstrated usage as defined by Commission rule within the applicable timeframe. Where a subscriber has not used their service within the period established by rule, SafetyNet follows the notification and de-enrollment procedures required by 47 C.F.R. § 54.405(e)(3).<sup>34</sup>

### **F. Annual Re-certification**

SafetyNet recertifies subscriber eligibility annually in accordance with 47 C.F.R. § 54.410(f) and applicable USAC procedures.<sup>35</sup> The Company utilizes the National Verifier for recertification and follows all requirements and timelines established by Commission rule or USAC guidance for the recertification process.

Subscribers who do not respond to recertification requests or who fail to demonstrate continued eligibility are de-enrolled from the Lifeline program consistent with 47 C.F.R. § 54.405(e)(4).<sup>36</sup>

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<sup>32</sup> 47 C.F.R. § 54.407(a)-(b).

<sup>33</sup> 47 C.F.R. § 54.407(c)(2) (usage requirements for subscribers with no fee assessed).

<sup>34</sup> 47 C.F.R. § 54.405(e)(3) (de-enrollment for non-usage).

<sup>35</sup> 47 C.F.R. § 54.410(f).

<sup>36</sup> 47 C.F.R. § 54.405(e)(4).

### **G. De-Enrollment for Ineligibility or by Request**

SafetyNet de-enrolls subscribers from the Lifeline program in accordance with 47 C.F.R. § 54.405(e).<sup>37</sup> De-enrollment occurs upon subscriber request, failure of annual recertification, subscriber ineligibility including failure of eligibility re-verification, non-usage as defined by Commission rule, duplicate subscriber identification through NLAD, or other circumstances specified by Commission rule or USAC guidance.

SafetyNet processes NLAD transactions for de-enrollment consistent with applicable USAC procedures and timelines. The Company provides notice to subscribers prior to de-enrollment where required by Commission rule.<sup>38</sup>

Subscribers enrolled in Lifeline pursuant to the Safe Connections Act, 47 U.S.C. § 254(j)(2), are subject to the enrollment periods and de-enrollment provisions set forth in 47 C.F.R. § 54.424.<sup>39</sup>

### **H. Marketing of Lifeline Service Offering**

SafetyNet markets its Lifeline service offering in accordance with 47 C.F.R. § 54.405(c).<sup>40</sup> All marketing materials clearly and conspicuously identify the service as a Lifeline-supported service and include disclosures required by Commission rule.

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<sup>37</sup> 47 C.F.R. § 54.405(e).

<sup>38</sup> See 47 C.F.R. § 54.405(e)(1) (notice requirements).

<sup>39</sup> 47 C.F.R. § 54.424; *see also* Safe Connections Act of 2022, Pub. L. 117-223.

<sup>40</sup> 47 C.F.R. § 54.405(c).

The Company does not engage in marketing practices prohibited by Commission rule or USAC guidance.

## **II. Description of Lifeline Service Offerings**

SafetyNet offers Lifeline-supported wireless service to eligible low-income consumers in the states where it holds ETC designation. The Company's Lifeline service offerings meet or exceed the minimum service standards established by the Commission pursuant to 47 C.F.R. § 54.408.<sup>41</sup>

### **A. Service Plans**

SafetyNet's Lifeline service plans provide voice and data services at no cost to qualifying subscribers, consistent with Commission rules permitting reimbursement for service offerings where no end-user fee is assessed.<sup>42</sup> The Company's current Lifeline service offerings are summarized below and detailed in Exhibit B.

<b>Plan Feature</b>	<b>Standard Lifeline</b>	<b>Tribal Lifeline</b>
Monthly Voice Minutes	350	Unlimited
Monthly Data	4.5 GB	4.5 GB
Mobile Hotspot	Included	Included
Monthly Subscriber Cost	\$0	\$0
Activation Fee	\$0	\$0

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<sup>41</sup> See 47 C.F.R. § 54.408; *see also* Wireline Competition Bureau annual Public Notices announcing minimum service standards.

<sup>42</sup> See 47 C.F.R. § 54.407(a) (reimbursement for Lifeline service); 47 C.F.R. § 54.407(c)(2) (usage requirements for subscribers with no fee assessed).

Service offerings meet or exceed the minimum service standards in effect at the time of enrollment as announced by Bureau Public Notice.<sup>43</sup> SafetyNet will adjust its service offerings as necessary to comply with updated minimum service standards without the need for compliance plan amendment.

## **B. Supported Services**

SafetyNet's Lifeline offerings include the supported services identified in 47 C.F.R. § 54.101(a), including voice telephony service capable of originating and terminating calls, access to emergency services including 911 and E911, and toll limitation services as described below.<sup>44</sup>

## **C. Toll Limitation**

SafetyNet provides toll limitation to Lifeline subscribers at no charge, consistent with 47 C.F.R. § 54.401(a)(2).<sup>45</sup> The Company's Lifeline service is structured such that subscribers are not able to incur toll charges in excess of their service plan allowances. Subscribers who wish to make calls that would otherwise incur toll charges may purchase additional services at their option.

## **D. Service Area**

SafetyNet offers Lifeline service in the twenty-six (26) states where it currently holds ETC designation: Alabama, Arizona, Arkansas, California, Colorado, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Michigan, Mississippi, Missouri, Nevada, New Jersey,

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<sup>43</sup> 47 C.F.R. § 54.408(b)-(c).

<sup>44</sup> 47 C.F.R. § 54.101(a).

<sup>45</sup> 47 C.F.R. § 54.401(a)(2).



New York, Ohio, Oklahoma, Pennsylvania, Tennessee, Virginia, Washington, West Virginia, and Wisconsin.

The Company provides service throughout its designated service areas utilizing underlying carrier networks with nationwide coverage capabilities.

#### **E. Tribal Lands**

SafetyNet offers enhanced Lifeline support to eligible subscribers residing on Tribal lands, consistent with 47 C.F.R. § 54.403(a)(3).<sup>46</sup> Subscribers on Tribal lands who qualify for Lifeline and meet the requirements for enhanced Tribal support receive additional benefits as reflected in the Company's service plan offerings.

#### **F. Device Offerings**

SafetyNet may provide handsets to Lifeline subscribers at no charge or at reduced cost in certain service areas or circumstances, subject to availability and program requirements.<sup>47</sup> Where devices are provided, they are capable of voice telephony, data services, and access to 911/E911 emergency services. The Company offers handsets that are hearing aid compatible consistent with 47 C.F.R. § 20.19.

Subscribers may also use their own compatible devices to access SafetyNet's Lifeline service through the Company's Bring Your Own Device (BYOD) program.

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<sup>46</sup> 47 C.F.R. § 54.403(a)(3).

<sup>47</sup> The provision of devices is not a condition of Lifeline support. Device availability and terms may vary by service area and are subject to change.

## **G. Marketing and Outreach**

SafetyNet markets its Lifeline service offerings in accordance with 47 C.F.R. § 54.405(c).<sup>48</sup>

Marketing materials clearly identify the service as Lifeline-supported and include required disclosures regarding program eligibility, the one-per-household limitation, and other information required by Commission rule.

The Company does not engage in marketing practices that target consumers who are not eligible for Lifeline or that misrepresent the nature of the Lifeline program.

## **III. Reimbursement from the Fund**

SafetyNet seeks reimbursement from the federal Low Income Fund for Lifeline service provided to eligible subscribers in accordance with 47 C.F.R. § 54.407.<sup>49</sup>

### **A. Reimbursement Claims**

SafetyNet claims reimbursement only for subscribers who have been determined eligible through the National Verifier and enrolled in the National Lifeline Accountability Database (NLAD).<sup>50</sup>

The Company does not seek reimbursement for any subscriber until eligibility has been verified and the subscriber has been successfully enrolled in NLAD without duplicate conflict.

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<sup>48</sup> 47 C.F.R. § 54.405(c).

<sup>49</sup> 47 C.F.R. § 54.407.

<sup>50</sup> 47 C.F.R. § 54.410 (National Verifier); 47 C.F.R. § 54.404 (NLAD).

SafetyNet submits reimbursement claims through USAC's systems in accordance with established procedures and timelines.<sup>51</sup> The Company claims the federal Lifeline support amount applicable to each subscriber based on the subscriber's location and eligibility status, including enhanced Tribal support where applicable.<sup>52</sup>

## **B. Usage Requirements**

For subscribers from whom SafetyNet does not collect a monthly fee, the Company complies with the usage requirements set forth in 47 C.F.R. § 54.407(c)(2).<sup>53</sup> SafetyNet does not claim reimbursement for any subscriber who has not demonstrated qualifying usage within the timeframe established by Commission rule.

## **C. Reimbursement Amounts**

SafetyNet claims the federal Lifeline support amounts established by Commission rule. For non-Tribal subscribers, the Company claims the monthly support amount specified in 47 C.F.R. § 54.403(a). For eligible subscribers residing on Tribal lands, the Company claims the enhanced monthly support amount specified in 47 C.F.R. § 54.403(a)(3).<sup>54</sup>

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<sup>51</sup> See USAC Lifeline Program guidelines and procedures.

<sup>52</sup> 47 C.F.R. § 54.403(a) (support amounts); 47 C.F.R. § 54.403(a)(3) (enhanced Tribal support).

<sup>53</sup> 47 C.F.R. § 54.407(c)(2).

<sup>54</sup> 47 C.F.R. § 54.403(a)(3).

The Company does not claim reimbursement in excess of the amounts permitted by Commission rule and does not claim both federal Lifeline support and support from a state program for the same subscriber where prohibited.<sup>55</sup>

#### **IV. Certifications, Reporting, and Cooperation with Regulators**

SafetyNet complies with all certification and reporting requirements applicable to Lifeline ETCs and cooperates fully with federal and state regulators in oversight of the Lifeline program.

##### **A. Annual Certifications**

SafetyNet submits annual certifications as required by Commission rules. The Company submits FCC Form 555 annually, certifying compliance with Lifeline program rules and the accuracy of information provided to USAC, as required by 47 C.F.R. § 54.416.<sup>56</sup> The Company also submits FCC Form 481 annually, providing information regarding Lifeline service offerings, outages, and other data required by 47 C.F.R. § 54.422.<sup>57</sup> SafetyNet certifies that it will comply with all certification requirements as they may be amended or adopted by the Commission.

##### **B. Reporting Requirements**

SafetyNet complies with reporting requirements applicable to Lifeline ETCs under 47 C.F.R. Part 54, Subpart E, and other applicable Commission rules.<sup>58</sup> The Company submits required

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<sup>55</sup> See 47 C.F.R. § 54.403(a)(1) (federal support amount); state-specific rules regarding duplicative support.

<sup>56</sup> 47 C.F.R. § 54.416.

<sup>57</sup> 47 C.F.R. § 54.422.

<sup>58</sup> See 47 C.F.R. §§ 54.400-54.422.

reports and data to USAC and the Commission in accordance with established procedures and deadlines.

### **C. Recordkeeping**

SafetyNet maintains records sufficient to demonstrate compliance with Lifeline program requirements, as required by 47 C.F.R. § 54.417.<sup>59</sup> Records are retained for the period required by Commission rule and are maintained in formats accessible for audit or regulatory review.

The Company's recordkeeping practices include documentation of subscriber eligibility determinations and certifications, enrollment and de-enrollment transactions, agent registration and training, reimbursement claims, and other records required by Commission rule or USAC guidance.

### **D. Cooperation with Audits and Investigations**

SafetyNet cooperates fully with audits and investigations conducted by the Commission, USAC, or their designees, as required by 47 C.F.R. § 54.420.<sup>60</sup> The Company produces records and documentation upon request, responds to inquiries within required timeframes, provides access to personnel and systems as necessary, and implements corrective actions in response to audit findings.

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<sup>59</sup> 47 C.F.R. § 54.417.

<sup>60</sup> 47 C.F.R. § 54.420.

## **E. State Regulatory Compliance**

In states where SafetyNet holds ETC designation, the Company complies with applicable state reporting and certification requirements in addition to federal obligations. SafetyNet cooperates with state public utility commissions and other state regulators in their oversight of Lifeline and state universal service programs.

## **F. Service Quality and Consumer Protection**

SafetyNet satisfies applicable consumer protection and service quality standards. The Company commits to compliance with the CTIA Consumer Code for Wireless Service, as required by 47 C.F.R. § 54.202(a)(3).<sup>61</sup>

In accordance with 47 C.F.R. § 54.202(a)(2), SafetyNet commits to remain functional in emergency situations. The Company maintains systems and carrier relationships designed to ensure continuity of service, and coordinates with underlying carriers regarding network outages or emergencies affecting Lifeline subscribers.

The Company does not impose an additional or separate tethering charge for mobile data usage below the minimum service standards, consistent with 47 C.F.R. § 54.408(f).<sup>62</sup>

## **PUBLIC INTEREST STATEMENT**

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<sup>61</sup> 47 C.F.R. § 54.202(a)(3).

<sup>62</sup> 47 C.F.R. § 54.408(f).

Approval of this revised Compliance Plan will serve the public interest, convenience, and necessity consistent with section 254 of the Communications Act.<sup>63</sup>

SafetyNet has provided Lifeline-supported wireless service to eligible low-income consumers since 2012, extending the benefits of telecommunications connectivity to households that might otherwise lack affordable access. The Company currently serves subscribers in twenty-six (26) states and has demonstrated its commitment to program integrity through more than a decade of compliant operations under a Bureau-approved compliance plan.

The proposed ownership transition will not disrupt service to existing subscribers or diminish the Company's commitment to Lifeline program compliance. Mr. Klein has served as an executive officer of the Company since 2014, initially as President and subsequently as Chief Executive Officer, and Mr. Matthews has served as Chief Technology Officer since 2014. They possess intimate knowledge of SafetyNet's operations, compliance infrastructure, and regulatory obligations. The transition represents an orderly succession from the Company's founder to its existing management team, ensuring continuity and stability for Lifeline subscribers.

Approval of this revised Compliance Plan will ensure continued availability of Lifeline service to eligible low-income consumers in SafetyNet's designated service areas and confirm the Company's ongoing commitment to compliance with Commission rules and program integrity requirements. Approval will also facilitate an orderly ownership transition that preserves

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<sup>63</sup> 47 U.S.C. § 254.

operational continuity and advance the Commission's universal service objectives by supporting affordable telecommunications access for qualifying households.<sup>64</sup>

SafetyNet respectfully submits that approval of this revised Compliance Plan is consistent with the public interest and the goals of the Lifeline program.

### **COMPLIANCE COMMITMENT**

SafetyNet Wireless affirms its ongoing commitment to full compliance with all current and future requirements of the federal Lifeline program as established by the Communications Act, Commission rules, Commission orders, and USAC guidance.<sup>65</sup>

The Company understands that participation in the Lifeline program requires continued adherence to the eligibility, enrollment, service delivery, usage monitoring, de-enrollment, recordkeeping, and reporting provisions codified in 47 C.F.R. Part 54, Subpart E.<sup>66</sup> SafetyNet commits to enrolling only eligible consumers through the National Verifier, maintaining accurate subscriber records in the NLAD, and claiming reimbursement only for eligible, enrolled subscribers who demonstrate qualifying usage. The Company further commits to complying with recertification and de-enrollment requirements, providing required disclosures to consumers, training and overseeing agents in accordance with Commission rules, cooperating with audits

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<sup>64</sup> See 47 U.S.C. § 254(b) (universal service principles); 47 C.F.R. § 54.400 (Lifeline program purpose).

<sup>65</sup> See 47 U.S.C. § 254; 47 C.F.R. Part 54, Subpart E.

<sup>66</sup> 47 C.F.R. §§ 54.400-54.422.



and regulatory oversight, and adapting its practices to conform to future rulemakings, orders, and guidance.

SafetyNet's systems, policies, and operational controls are designed to support compliance and will be updated as necessary to reflect regulatory developments, changes in technology, or updates to program administration. The Company designates a Compliance Officer with authority and responsibility to implement this Plan, oversee adherence to Lifeline rules, and coordinate with Commission and USAC staff.

This revised Compliance Plan reflects SafetyNet's practices and obligations at the time of filing. The Company affirms that it will incorporate any newly adopted Lifeline program requirements, technologies, administrative tools, or oversight mechanisms authorized by the Commission or USAC, consistent with the rules in effect at that time.<sup>67</sup>

SafetyNet reaffirms its commitment to safeguarding program integrity, promoting access for eligible low-income households, and supporting the Commission's universal service objectives.

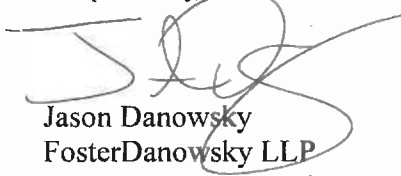
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<sup>67</sup> The compliance practices described herein are subject to change consistent with program rules and as those rules may be amended, replaced, or adopted from time to time.

## CONCLUSION

For the reasons set forth above, SafetyNet Wireless respectfully requests that the Wireline Competition Bureau approve this revised Compliance Plan.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'JD', is written over the printed name and firm name.

Jason Danowsky  
FosterDanowsky LLP  
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Austin, TX 78701  
Tel: (512) 708-8700  
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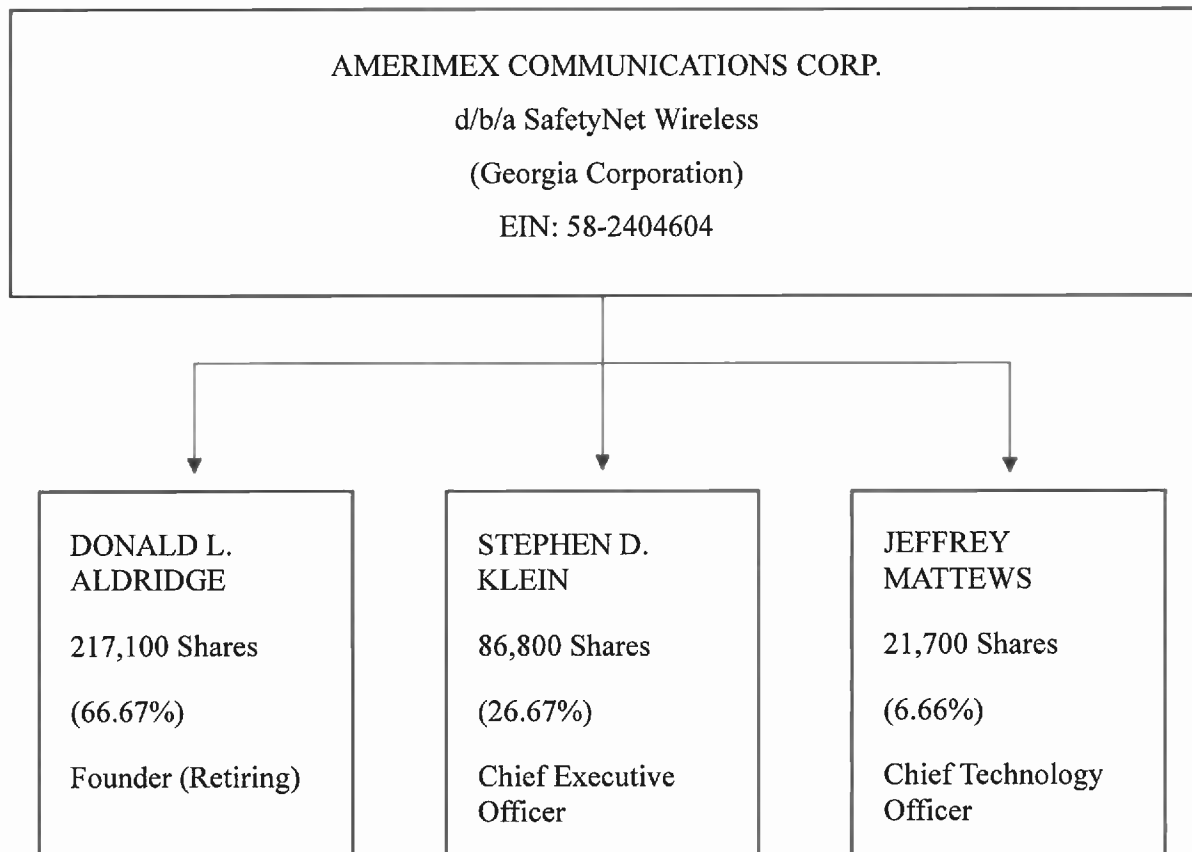
*Counsel for AmeriMex Communications  
Corp. dba SafetyNet Wireless.*

**Exhibit A**  
**Pre- and Post-Transaction Organization Charts**

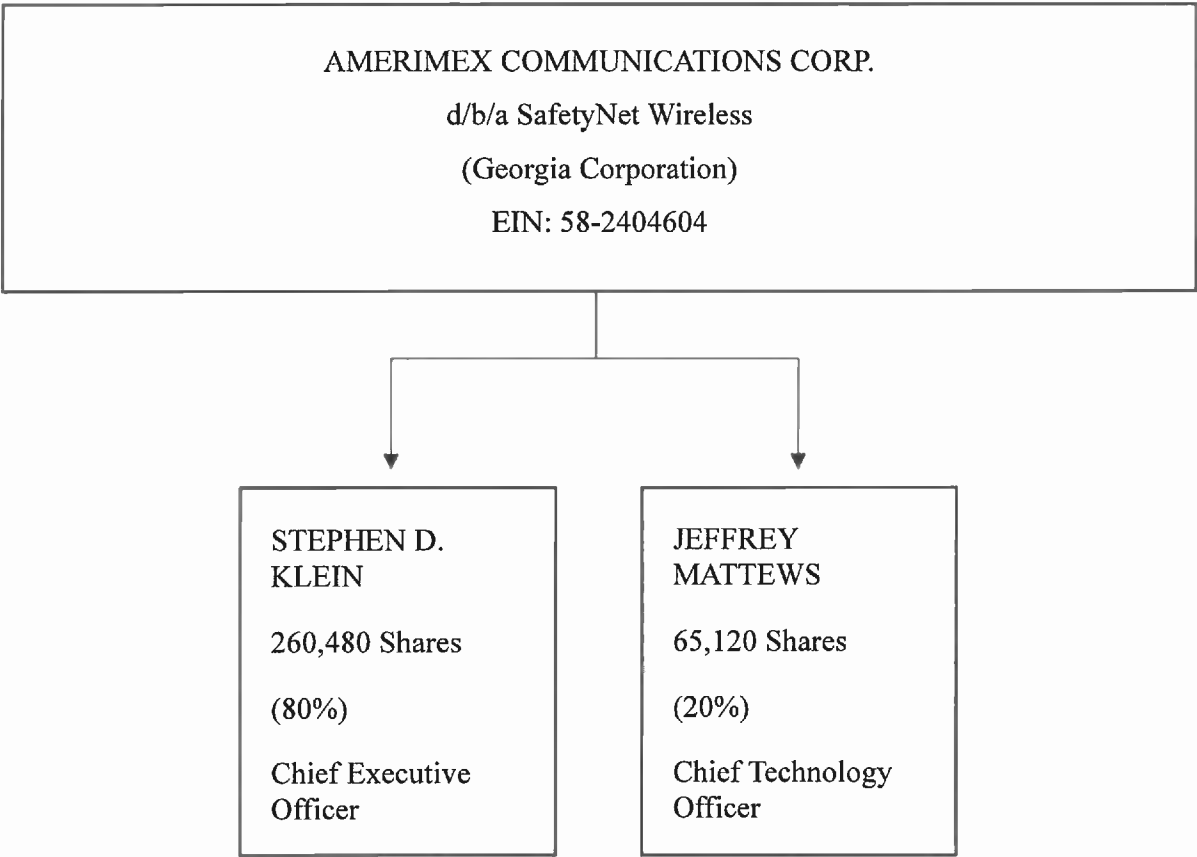
**BEFORE THE**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

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

**CHART 1: PRE-TRANSACTION OWNERSHIP STRUCTURE**



**CHART 2: POST-TRANSACTION OWNERSHIP STRUCTURE**



**Total Issued and Outstanding Shares: 325,600**

**TRANSACTION SUMMARY**

Shareholder	Pre-Transaction	Post-Transaction	Change
Donald L. Aldridge	217,100 shares (66.67%)	0 shares (0%)	Sells all shares
Stephen D. Klein	86,800 shares (26.67%)	260,480 shares (80%)	Acquires 173,680 shares
Jeffrey Matthews	21,700 shares (6.66%)	65,120 shares (20%)	Acquires 43,420 shares
Total	325,600 shares (100%)	325,600 shares (100%)	—

## OFFICERS AND DIRECTORS

Name	Position	Pre-Transaction	Post-Transaction
Donald L. Aldridge	Founder/Director	Yes	No
Stephen D. Klein	Chief Executive Officer	Yes	Yes
Jeffrey Matthews	Chief Technology Officer	Yes	Yes

## NOTES

1. Transaction pursuant to Stock Purchase Agreement dated December 17, 2025.
2. Mr. Aldridge founded the Company on July 15, 1998 and is retiring from the business.
3. No change in the Company's legal name, state of incorporation, or d/b/a.
4. No third-party acquirer; Purchasers are existing minority shareholders and officers.
5. Consummation of transaction is conditioned upon Bureau acceptance of Amended Compliance Plan.

**Exhibit B**  
**Pre- and Post-Transaction Organization Charts**  
  
**BEFORE THE**  
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**Washington, D.C. 20554**

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**SAFETYNET WIRELESS LIFELINE SERVICE OFFERINGS**

The following table summarizes SafetyNet Wireless's Lifeline service plan offerings. Service offerings meet or exceed the minimum service standards established by the Commission pursuant to 47 C.F.R. § 54.408 and as announced by Wireline Competition Bureau Public Notice.

**STANDARD LIFELINE PLAN (Non-Tribal)**

<b>Feature</b>	<b>Included</b>
<b>Monthly Voice Minutes</b>	350
<b>Monthly Data Allotment</b>	4.5 GB
<b>Text Messages</b>	Unlimited
<b>Mobile Hotspot / Tethering</b>	Included (no additional charge)
<b>Domestic Long Distance</b>	Included
<b>Caller ID</b>	Included
<b>Call Waiting</b>	Included
<b>Voicemail</b>	Included
<b>3-Way Calling</b>	Included
<b>Access to 911/E911</b>	Included
<b>Directory Assistance (411)</b>	Available (per-call charges apply)
<b>International Calling</b>	Available (per-minute charges apply)
<b>Monthly Subscriber Cost</b>	\$0.00
<b>Activation Fee</b>	\$0.00

### TRIBAL LIFELINE PLAN (Enhanced Support)

Feature	Included
Monthly Voice Minutes	Unlimited
Monthly Data Allotment	4.5 GB
Text Messages	Unlimited
Mobile Hotspot / Tethering	Included (no additional charge)
Domestic Long Distance	Included
Caller ID	Included
Call Waiting	Included
Voicemail	Included
3-Way Calling	Included
Access to 911/E911	Included
Directory Assistance (411)	Available (per-call charges apply)
International Calling	Available (per-minute charges apply)
Monthly Subscriber Cost	\$0.00
Activation Fee	\$0.00

### DEVICE OPTIONS

Option	Description
Company-Provided Device	SafetyNet may provide handsets at no charge or reduced cost in certain service areas or circumstances, subject to availability.
Bring Your Own Device (BYOD)	Subscribers may use their own compatible GSM-unlocked device.
Device Features	All devices are capable of voice, data, and 911/E911 access. Devices are hearing aid compatible per 47 C.F.R. § 20.19.

### SERVICE AREA

SafetyNet Wireless offers Lifeline service in the following twenty-six (26) states:

Alabama	Arizona	Arkansas	California	Colorado	Florida
Georgia	Illinois	Indiana	Kentucky	Louisiana	Maryland
Michigan	Mississippi	Missouri	Nevada	New Jersey	New York
Ohio	Oklahoma	Pennsylvania	Tennessee	Virginia	Washington
West Virginia	Wisconsin				

## **NETWORK AND COVERAGE**

SafetyNet provides service utilizing nationwide carrier networks. Coverage is available throughout the Company's designated service areas, subject to network availability in specific locations.

## **TOLL LIMITATION**

SafetyNet's Lifeline service includes toll limitation at no charge, consistent with 47 C.F.R. § 54.401(a)(2). The prepaid service structure prevents subscribers from incurring toll charges in excess of their service plan allowances.

## **MINIMUM SERVICE STANDARDS COMPLIANCE**

SafetyNet's Lifeline service offerings meet or exceed the minimum service standards in effect at the time of enrollment. The Company will adjust its service offerings as necessary to comply with updated minimum service standards announced by the Wireline Competition Bureau, without the need for compliance plan amendment.

<b>Requirement</b>	<b>Citation</b>	<b>SafetyNet Compliance</b>
Voice Minutes	47 C.F.R. § 54.408(b)(1)	Unlimited
Data Allotment	47 C.F.R. § 54.408(b)(2)	Meets or exceeds current MSS
Mobile Hotspot	47 C.F.R. § 54.408(f)	Included, no additional charge

## **STATE PROGRAMS AND PARTNER OFFERINGS**

In states where SafetyNet participates in state universal service programs, subscribers may receive enhanced benefits as determined by applicable state program rules. Service offerings



through authorized enrollment partners **may vary**. All offerings meet or exceed the federal minimum service standards.

#### **ADDITIONAL INFORMATION**

For current service plan details, coverage maps, and enrollment information, consumers may visit:

**Website:** [www.safetynetwireless.com](http://www.safetynetwireless.com)

**Customer Service:** 1-888-224-3212

**Exhibit C**  
**Officer Certification**

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

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

**CERTIFICATION OF OFFICER**

I, Stephen D. Klein, hereby certify under penalty of perjury that I am the Chief Executive Officer of AmeriMex Communications Corp. d/b/a SafetyNet Wireless (the "Company"), and that I am authorized to make this certification on behalf of the Company.

I have reviewed the Amended Lifeline Compliance Plan filed herewith (the "Amended Plan") and the accompanying exhibits. Based on my knowledge and belief, and after reasonable inquiry:

1. The information contained in the Amended Plan and accompanying exhibits is true, complete, and accurate as of the date of this certification.
2. The Company possesses the financial and technical capability to provide Lifeline service in compliance with the Commission's rules, as required by 47 C.F.R. § 54.202(a)(4).
3. The Company will comply with all applicable Lifeline program rules, orders, and guidance issued by the Federal Communications Commission, including 47 C.F.R. Part 54, Subpart E.
4. The Company will implement the policies, procedures, and safeguards described in the Amended Plan to guard against waste, fraud, and abuse in the Lifeline program.

5. The ownership information provided in the Amended Plan and Exhibit A accurately reflects the pre- and post-transaction ownership structure of the Company.
6. The Company will notify the Wireline Competition Bureau of any material changes to the information provided in the Amended Plan.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 24, 2025



Stephen D. Klein  
Chief Executive Officer  
AmeriMex Communications Corp.  
dba SafetyNet Wireless  
600 2<sup>nd</sup> ST S  
Safety Harbor, FL 34695