

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: info@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

August 22, 2014

VIA OVERNIGHT DELIVERY

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

REDACTED

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14 AUG 25 AM 9:45
COMMISSION
CLERK

Re: 2014 Annual Lifeline Data Request (Global Connection Inc. of America)
CONFIDENTIAL TREATMENT REQUESTED


To Whom It May Concern:

Global Connection Inc. of America (herein "Global") hereby files an original and two (2) copies of its responses to the 2014 Annual Lifeline Data Request.

Global hereby requests confidential treatment of certain information identified herein (Exhibit A, Response to No. 1-8, 16 and Exhibit B, Response to No. 12) pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

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

Sincerely,



Heather Kirby, Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys for Global Connection Inc. of America

COM _____
AFD _____
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IDM _____
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CLK _____

RESPONSES TO
CLEC AND WIRELESS LIFELINE DATA REQUEST 2014

1. The number of residential access lines in service each month.

Response: See CONFIDENTIAL Exhibit A.

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

Response: See CONFIDENTIAL Exhibit A.

3. The amount of Lifeline credit provided to Lifeline customers on a monthly billing.

Response: \$9.25 federal Lifeline subsidy per customer per month.

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

Response: See CONFIDENTIAL Exhibit A.

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

Response: See CONFIDENTIAL Exhibit A.

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

Response: See CONFIDENTIAL Exhibit A.

7. The number of customers participating in Transitional Lifeline each month.

Response: See CONFIDENTIAL Exhibit A.

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

Response: See CONFIDENTIAL Exhibit A.

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

Response: None; Global does not resale access lines to other carriers.

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

a. Procedures used to process applications received from the Office of Public Counsel.

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

Response:

- a. The State of Florida's Office of Public Counsel Lifeline application specifically state "If you are NOT a customer of AT&T, CenturyLink, T-Mobile or Verizon, please contact your telephone company to apply for Lifeline". As we are not a specified designated Company, all applications are received either directly from customers, through the PSC portal or through the DCF direct enrollment process.
- b. The Company maintains the following procedures for self-certification applications received, regardless as to the means by which applications are received. Upon receipt of a potential subscriber's application, trained Agents handle and process each application individually to ensure compliance, efficiency and reliability. Trained Agents review subscriber applications to ensure compliance with each of the following regulatory & Company policy base objectives:
 - 1) The application captures all required subscriber information
 - 2) The applicant acknowledges understanding of all of the required disclosures.
 - 3) The applicant understands and completes all of the required certifications.
 - 4) The consumer's identity is verified through review of acceptable government identification.

Upon successful navigation of these objectives, the consumer's eligibility is confirmed and verified through the review of acceptable documentation and upon established access through querying of the available databases. If such eligibility is confirmed and verified, the applicant's self-certification form is retained, and processed, effectuating the connection and initiation of phone service under the Lifeline program. Each application is, retained in electronic form and / or hard copy, proof information is captured, and any proof documentation is destroyed or returned to each applicant. Finally, the Company maintains these records of specific data relied upon to confirm the applicant's initial eligibility for Lifeline.

- c. Upon receipt of notification of applications through the PSC system, the Company proceeds to access the PSC portal to retrieve the potential subscriber applications and download the respective applications for processing. The applications provide for the necessary customer information and the Company proceeds to contact each applicant in order to ultimately effectuate Lifeline service. Once contacted, each customer is instructed on the Company's application process and on how to most efficiently prepare, submit and prove eligibility in order to commence Lifeline service. Each customer application is processed in the manner as described above under subparagraph (b) to include but not be limited to, confirming eligibility through the review of documentation. The Company is in the final process steps of setting up access into the DCF automatic enrollment process database and upon establishing access, eligibility will be confirmed through such database for applications received through the PSC portal.
 - d. Customers that inquire about or apply for Lifeline Assistance through the Florida Department of Children and Families are routed to the PSC online process via a link on the official website (MyFLFamilies.com). At this point applicants would then follow the same procedures listed in description (c).
 - e. Applications received for wire-line subscribers are typically and ordinarily processed with wire-line services becoming active and initiated within one to five business days after application completeness and eligibility verification. Wireline services become active upon complete processing and the customer immediately receives the Lifeline credit upon initiation of service.
11. Description of your company's procedures for performing continued certification of customer eligibility after initial certification. Include the following in your response:
- a. Time period between initial certification and annual certification.
 - b. Method(s) used to verify customer eligibility.
 - c. Frequency of periodic certification.

Response:

- a. **Global requires Lifeline end users to recertify continued eligibility annually in accordance with FCC regulations.**
- b. **Global reviews Lifeline consumer proof of program participation or income eligibility as well as applications received from the state of Florida from consumers requesting service through the state's online lifeline enrollment portal.**
- c. **Annually.**

12. Description of your company's procedures for Lifeline. Include the following in your response:
- a. Internal procedures for promoting Lifeline.
 - b. Outreach and educational efforts involving participation in community events.
 - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
 - d. Copies of Lifeline outreach materials of your company.
 - e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Response: See Confidential Exhibit B

13. Description of procedures associated with enrollment of Lifeline customers by resellers of telecommunications services through resale agreements. Include the following in your response:
- a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.
 - b. Initial and annual certification procedures and requirements.
 - c. Any other terms and conditions applicable to resellers offering Lifeline that are not imposed on resellers who do not offer Lifeline.

Response:

- a. The Company passes through to all approved Lifeline subscribers the full Federal lifeline credit of \$9.25 and, in addition the Company provides for an additional \$3.50 company lifeline credit per month.
- b. Wireless: Not Applicable

Wire-Line:

Preface: Pursuant to the FCC USAC Lifeline Reform Order, as of 4/2/2012, the Company no longer enrolls or participates non-tribal customers in the Link-Up program. Enrolling customers in Link-Up prior to the elimination of this program were processed, as narrated below, in the same manner as enrolling customers in the Lifeline program.

The Company has established policies and controls in place to provide reasonable assurance over the reliability of a prospective customer's eligibility and identity. Prospective customers can enroll in Global's wire-line Lifeline program by calling the company's customer service center, applying online and enrolling in person at agent store locations. Regardless as to how prospective customers are enrolled, the Company verifies identity, proof of eligibility, address verification, head of household and single subsidy prior to enrolling a consumer in a Lifeline subsidy program and prior to seeking a Lifeline subsidy reimbursement. The Company verifies Proof of Eligibility

through either accessing State / Agency available databases in selected jurisdictions or wherein such databases are not made available or established, reviews customer eligibility documentation. Customer eligibility documentation consists of documentation of participation in a Lifeline eligible program, or documentation confirming income levels at or below the State / Federal designated rates. The documentation reviewed is recorded on the subscriber's Lifeline application which is subsequently and ultimately, permanently notated to the subscribers' account. Any copies of documentation as may be faxed or transmitted are destroyed shortly after capture of the information. During in store enrollment, information is captured and transmitted and eligibility documentation is immediately returned to the prospective customer. The Company provides for each subscriber to make certain certifications, and acknowledgements of disclosures

- c. Although the Company currently does not recognize any other additional terms and conditions applicable to resellers offering Lifeline that are not imposed on resellers who do not offer Lifeline, terms and conditions may be implemented if provisions change due to procedural or requirement demands.

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

Response: The Company provides training to all of its customer service representatives and field agents regarding promoting, soliciting, and enrolling subscribers in the Lifeline program. The objectives of the training program offered by the Company include the following:

To assist Lifeline Applicants in determining eligibility

To answer questions about Lifeline eligibility

To review documentation and determine if it satisfies Lifeline Eligibility.

To be able to verbally explain the certifications to the consumers when enrolling

To be able to answer questions about the required disclosures.

To be able to explain the "One Lifeline Phone per Household" requirement.

A summary script as is used by our Customer service representatives is attached.

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

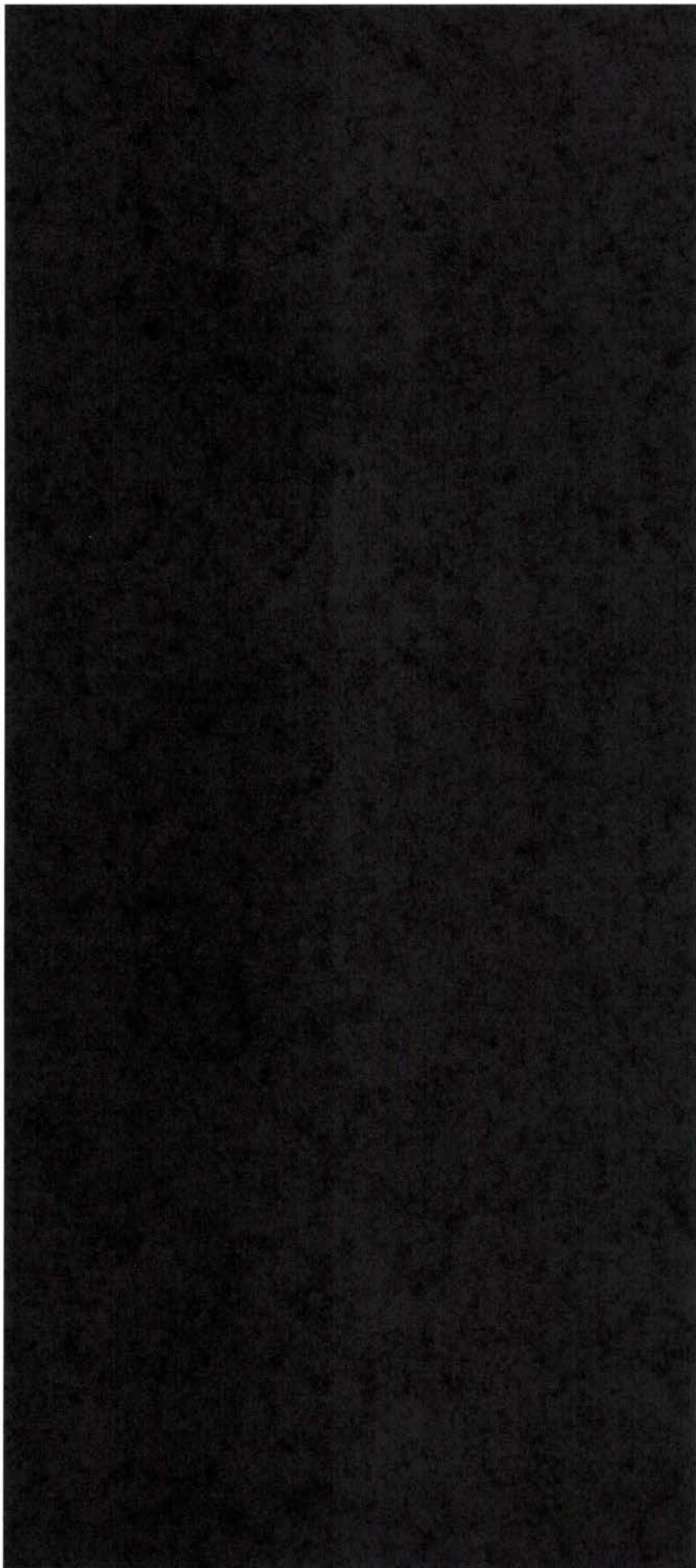
Response:

www.connectwithglobal.com

www.realhomephone.com

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

Response: Yes. See Confidential Exhibit A



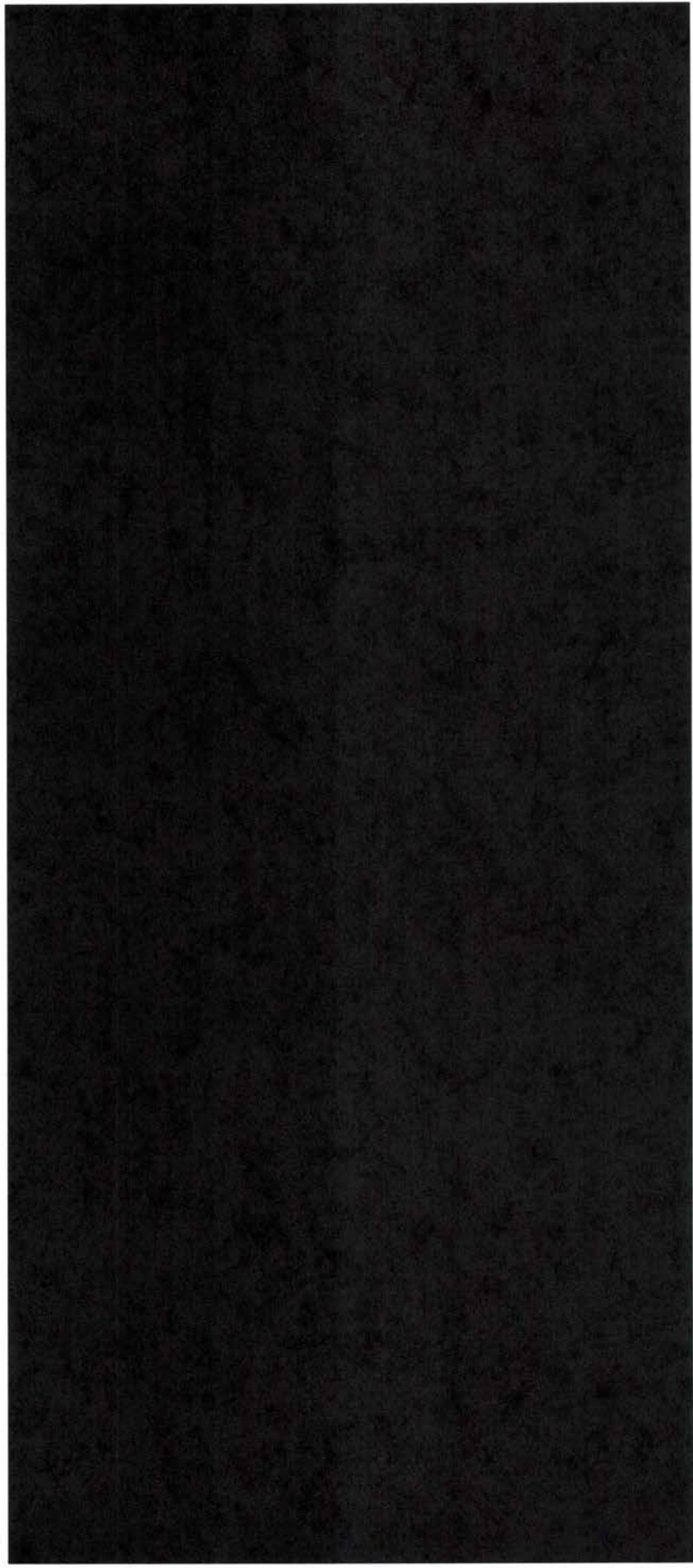


EXHIBIT C

Customer Service Script
July 2013 to June 2014
Wire-Line Base Script

Do you wish to establish Residential Service ?

Do you qualify for government assistance or do you qualify for earning at or less than 135% of the Federal Poverty Guidelines ?

If, Yes, What Program do you qualify for ?

Record: Eligibility Proof Type

Record: Proof of Eligibility Note

Lifeline Benefits Disclosure

1. A complete and signed Lifeline Service Application and Certification (“Certification”) is required to enroll you in Global Connection Inc. of America (“the Company’s”) Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.
2. **One Lifeline service per household disclosures:** Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. 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. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers.
3. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission’s rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

4. I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Describe available plans ?

What plan would you like ?

Toll Limitation Service

Global implements Toll Limitation Services (TLS) for our customers to prevent excessive usage charges. Global charges a recurring charge of \$3.00 to put TLS on a line.

Would you like to establish TLS on your telephone line ?

Lifeline Certifications

1. I agree to the following conditions:
2. **Letter of Authorization:** This is a written authorization, until further written notice to convert to, and/or install new telephone service from my current carrier provider to Global Connection Inc. of America for local service. I authorize my local toll to be changed to Global Connection. I authorized my long-distance service to be changed to Global Connection. I authorized Global to freeze my local service to prevent any unauthorized switch from Global Connection to another carrier unless Global Connection receives written or verbal authorization from me. I authorize Global to act as my agent for these changes. I understand that there may be a charge for these changes and a charge to switch back to my previous carrier. I am authorized to make changes on the number listed below and I have read and understood that by signing and dating this form I have agreed to these authorized changes
3. **Authorizations:** I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
4. **I hereby certify, under penalty of perjury, that:**
5. I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required

6. I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
7. I am not listed as a dependent on another person's tax return (unless over the age of 60)
8. The address listed below is my primary residence, not a second home or business
9. If I move to a new address, I will provide that new address to the Company within 30 days
10. If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
11. I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
12. I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.
13. The information contained in this certification form is true and correct to the best of my knowledge.