

State of Florida



# Public Service Commission

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

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

**DATE:** November 9, 2016

**TO:** Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk

**FROM:** Catherine S. Beard, Public Utility Analyst II, Office of Telecommunications

**RE:** Docket No. 160016-TX – Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.

*CSB*  
*CSB*  
*CSB*

Please add the attached documents to the docket file.

Please call me at 413-7080, if you have any questions.

Attachments

RECEIVED-FPSC  
2016 NOV 18 AM 8:02  
COMMISSION CLERK

## Catherine Beard

---

**From:** Catherine Beard  
**Sent:** Thursday, February 25, 2016 5:28 PM  
**To:** 'bshepard@ipc-llc.com'  
**Cc:** Beth Salak; Greg Fogleman  
**Subject:** Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.  
**Attachments:** Data request pdf.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Attached is a data request from staff regarding the recent petition for designation as an Eligible Telecommunications Carrier filed in Docket No. 160016-TX (Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.). A hard-copy has been sent to you as well, via US Mail. Please respond by March 11, 2016. Thank you!

Catherine Beard  
Florida Public Service Commission  
Public Utility Analyst II  
(850) 413-7080  
(850) 413-7081 fax  
[cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us)

COMMISSIONERS:  
JULIE I. BROWN, CHAIRMAN  
LISA POLAK EDGAR  
ART GRAHAM  
RONALD A. BRISÉ  
JIMMY PATRONIS

STATE OF FLORIDA



OFFICE OF TELECOMMUNICATIONS  
BETH W. SALAK  
DIRECTOR  
(850) 413-6600

## Public Service Commission

February 26, 2016

Mr. Brian Shepard  
President  
Integrated Path Communications, LLC  
9030 State Route 22, Suite 3  
Hillsdale, NY 12529-5060

**Re: Data Request for Docket No. 160016-TX – Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.**

Dear Mr. Shepard:

Staff is seeking additional information regarding the petition filed by Integrated Path Communications LLC, seeking Lifeline and High-cost support as an eligible telecommunications carrier (ETC) status. Please provide a written response to each of the questions in the attached data request on or before March 11, 2016.

Your company may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request.

If you have any questions, please contact Catherine Beard at (850) 413-7080 or [cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us) or Greg Fogleman at (850) 413-6574 or [gfoglema@psc.state.fl.us](mailto:gfoglema@psc.state.fl.us). Thank you.

Sincerely,

A handwritten signature in black ink that reads "Beth W. Salak".

Beth Salak  
Director

## **Data Request for Docket No. 160016-TX**

1. Please list the states or federally recognized tribal lands that Integrated Path Communications, LLC (Integrated Path) currently operates in.
  2. In each of the states or federally recognized tribal lands listed above, please indicate where Integrated Path is either: 1) an eligible telecommunications carrier (ETC) that is eligible for High-Cost and Low Income support from the federal universal service fund (USF) or 2) an ETC for Lifeline purposes only.
  3. For each state or federally recognized tribal lands listed above, please identify how much support Integrated Path received from the federal USF for 2015.
  4. List all pending ETC petitions, with docket numbers and the state in which the designation is requested.
  5. Has Integrated Path filed for ETC status in any state and subsequently withdrawn the petition or been denied? If so, please list those states and docket numbers, and whether the petition was for High-Cost and Low Income support or for Lifeline purposes only.
  6. How many Florida residential and business customers does Integrated Path presently serve? For each customer class listed above, please indicate what percent is provided through resale, unbundled network elements, or network facilities deployed by Integrated Path. For each customer class listed above, please list what percent of customers are serviced by wireline, mobile wireless, fixed wireless, VoIP, or other service.
  7. If Integrated Path receives ETC designation in Florida, approximately how long will it take for Integrated Path to offer Lifeline service in the area in which it receives the ETC designation? Please elaborate on any extended or special circumstances.
  8. Does Integrated Path understand that there may be an audit by the Florida Public Service Commission (PSC) of the use of universal service funds?
  9. Does Integrated Path have any outstanding complaints at any state commissions or at the Federal Communications Commission (FCC)? If so, please provide detailed documentation of any complaint filed with a state commission or at the FCC in the past three years. Please specify if the complaint is related to Lifeline or High-Cost.
  10. Please provide a description of Integrated Path's corporate structure, with both names and titles. Please provide a list of Integrated Path's owners or corporate officers and indicate if any are also owners, corporate officers or employees of any other telecommunications companies.
  11. Please provide an example of a typical Integrated Path residential and business customer bills. What is the average residential bill in Florida?
-

12. Will Integrated Path seek Lifeline reimbursement from the Universal Service Administrative Company if granted ETC status? If yes, list the amount per customer Integrated Path would be claiming.
13. Are all Integrated Path offerings bundled packages? Will Integrated Path provide the Lifeline discount to any bundle a customer chooses?
14. Does Integrated Path understand that Florida's Lifeline program provides that if a Lifeline customer is no longer eligible for Lifeline, the ETC must offer to provide a 30% monthly discount off of its local rate to that customer for a period of 12 months without reimbursement?
15. Does Integrated Path maintain separate books/general ledgers for each state that it operates in? Where are the books/general ledgers for Florida customers maintained?
16. Has Integrated Path received requests for service from potential Lifeline customers or customers in high-cost areas in Florida that were unfulfilled in the previous calendar year? If so, how many and please specify which program.
17. Please provide the address (URL) to the Integrated Path website, if there is one.
18. Please provide any interconnection or commercial agreements you currently have in AT&T Florida's service territory with other telecommunications carriers. Please include signed evidence of the agreements, along with invoices detailing both unbundled network elements (UNEs) and resale charges.
19. Please provide examples of how Integrated Path will advertise using media of general distribution, the availability of the supported services and the charges for these services. What specific plans does Integrated Path have for advertising its Lifeline service offering in Florida?
20. Will Integrated Path be willing to advertise Lifeline availability in more than the English language? If yes, please identify what additional language(s) Integrated Path will advertise in.
21. Integrated Path's petition states it is seeking designation as an ETC in federally recognized tribal lands. Has Integrated Path contacted those tribes where it is seeking designation? Please provide the name of each Florida Tribe and the location of each tribal land where Integrated Path is requesting ETC designation. Also, please provide any documents that may have been obtained as a result.
22. Please identify any state rule or law identifying regulatory jurisdiction of the PSC to designate a carrier in a federally recognized tribal lands.
23. Please identify any federal rule or law identifying regulatory jurisdiction of the PSC to designate a carrier in a federally recognized tribal lands.
24. As a condition of receiving local service, are Integrated Path residential customers required to subscribe to Integrated Path long-distance services?

25. Describe Integrated Path local usage plans pursuant to 47 C.F.R. 54.101(a). If phone service is offered in a bundled package, please describe and enumerate the wireline local component (charge for local phone service) for which universal service compensation would be based on.
  26. Please provide the name of the person and/or entity which will be filing the Form 497 with USAC if Integrated Path obtains ETC status.
  27. Does Integrated Path provide service to its customers via a prepaid service? If so, what percentage of its customers receives their service via a prepaid service?
  28. Please provide Integrated Path's most current financial statements including balance sheet and profit and loss statements. Please indicate who prepared the statements.
  29. Please provide copies of all Federal and State of Florida income tax and/or corporate filings made on behalf of Integrated Path for the last three years.
  30. Have any owners, officers, or managers of Integrated Path been involved in any bankruptcy proceedings? If so, please provide details as to who, when, and where the bankruptcy occurred.
  31. Have any owners, officers, or managers of Integrated Path been charged or convicted of a criminal offense? If so, please provide details as to who, when, and where the charges or convictions occurred.
  32. Please identify any civil litigation in which an Integrated Path's owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness.
  33. Are customers who reconnect service with the company required to pay the past due bill and a reconnection fee prior to receiving service? Are Lifeline customers allowed to pay past due amounts over time? Are Lifeline customers charged a reconnection fee?
  34. Does Integrated Path still do business in the following states: Texas and New York?
  35. Is Integrated Path currently seeking certification in Wisconsin? If so, what is the status?
  36. Will Integrated Path offer all of the supported services using its own facilities or those obtained from other carriers? Is Integrated Path aware the requirement is to provide the supported services using its own facilities or a combination of its own facilities and resold services from other carriers?
  37. Will Integrated Path be using any sub-contractors (operations, call centers, etc.) to provide the required services? If so, provide the name of each company and physical address.
  38. AT&T has accepted support from the FCC for Phase II of the Connect America Fund. This funding award lasts from 2015-2020. Does Integrated Path agree that as a result there will not be
-

an opportunity for Integrated Path to compete for federal Connect America Phase II support? If Integrated Path does not agree, please explain.

39. Does Integrated Path believe that it will be able to receive other forms of federal high-cost support? If yes, please explain.

40. If Integrated Path is unable to receive federal High-Cost support, please explain how this would affect the business plan that currently includes High-Cost funding.

## APPLICANT CERTIFICATION

State of \_\_\_\_\_  
County of \_\_\_\_\_

My name is \_\_\_\_\_, I am employed by \_\_\_\_\_, located at \_\_\_\_\_ as its \_\_\_\_\_, I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireline Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

Company hereby certifies the following:

1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers (ETC), and the Florida Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding federal Universal Service Program.
3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
4. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to offering or getting USF or Lifeline, prior to the change of ownership and also make a showing of public interest to maintain the ETC designation.
5. Company understands that it may only receive reimbursement from the Universal Service Administrative Company (USAC) for active customer access lines which are provided using its own facilities or a combination of its own facilities and access lines obtained as UNEs from another carrier.
6. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records to document compliance with all federal and state requirements governing the Lifeline program for as long as the consumer receives Lifeline service plus five years.



7. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
8. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
9. Company agrees it will submit to the PSC a copy of Form 497s filed with USAC, and will make available supporting signed customer Lifeline certifications upon request to:  
  
Florida Public Service Commission  
Office of Telecommunications  
2540 Shumard Oak Drive  
Tallahassee, Florida 32399-0850
10. Company agrees that it will file a copy its annual reporting requirements for High-Cost support recipients pursuant to 47 C.F.R. 54.313 with the PSC.

**I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

Business Address:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Catherine Beard

---

**From:** Catherine Beard  
**Sent:** Thursday, April 21, 2016 6:59 PM  
**To:** 'bshepard@ipc-llc.com'  
**Cc:** Greg Fogleman; Beth Salak  
**Subject:** 2nd Data Request for Docket No. 160016  
**Attachments:** 2nd Data Request for Docket No. 160016.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Attached is staff's 2nd data request regarding the petition for designation as an Eligible Telecommunications Carrier filed in, Docket No. 160016-TX (Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.). A hard-copy is being sent to you as well, via US Mail. Please respond by May 6, 2016. Thank you!

Catherine Beard  
Florida Public Service Commission  
Public Utility Analyst II  
(850) 413-7080  
(850) 413-7081 fax  
[cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us)

COMMISSIONERS:  
JULIE I. BROWN, CHAIRMAN  
LISA POLAK EDGAR  
ART GRAHAM  
RONALD A. BRISÉ  
JIMMY PATRONIS

STATE OF FLORIDA



OFFICE OF TELECOMMUNICATIONS  
BETH W. SALAK  
DIRECTOR  
(850) 413-6600

## Public Service Commission

April 21, 2016

Mr. Brian Shepard  
President  
Integrated Path Communications, LLC  
9030 State Route 22, Suite 3  
Hillsdale, NY 12529-5060

**Re: 2<sup>nd</sup> Data Request for Docket No. 160016-TL – Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.**

Dear Mr. Shepard:

After reviewing Integrated Path's responses to Staff's initial data request, Staff has some additional questions that it would like for Integrated Path to provide answers to. Please find those questions located directly after this letter. Please provide a written response to each of the questions in the attached data request on or before May 6, 2016.

Your company may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request.

If you have any questions, please contact Catherine Beard at (850) 413-7080 or [cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us) or Greg Fogleman at (850) 413-6574 or [gfoglema@psc.state.fl.us](mailto:gfoglema@psc.state.fl.us). Thank you.

Sincerely,

Beth Salak  
Director

## **2<sup>nd</sup> Data Request for Docket No. 160016-TX**

41. Does Integrated Path intend to provide services in Florida that are based on TDM technology? If no, please elaborate.
42. Does Integrated Path intend to seek universal service support for VoIP services based on an ETC designation provided by the Florida Public Service Commission?
43. Does Integrated Path intend to seek universal service support for wireless services based on an ETC designation provided by the Florida Public Service Commission?
44. Please review your response to question number 1 in the first data request sent by staff and update as appropriate. We are seeking a comprehensive list of state(s) and federally recognized tribal land(s) in which your company currently offers service (not limited to Lifeline service in tribal lands).
45. Are there any states or federally recognized tribal land(s) for which Integrated Path has received ETC designation, but has not offered services? If yes, please identify all such areas.
46. For all states and federally recognized tribal land(s) identified in the response to questions 43 and 44, please state whether your company has been designated as 1) an eligible telecommunications carrier (ETC) that is eligible for High Cost and Low Income support, or 2) an ETC for Lifeline purposes only.
47. Please review your response to question number 3 in staff's first data request and update as appropriate. In question 3, we are seeking how much universal service support (i.e., High-Cost and Lifeline) your company has received by state and federal recognized tribal land (not limited to Lifeline on tribal lands).
48. Is Integrated Path currently providing service or seeking authorization to provide service in Iowa and California? If yes, please provide the docket number(s) and, if applicable, associated order(s). If no, please explain the discrepancy with your FCC Lifeline Compliance plan in WC Docket No. 11-42 filed on March 10, 2016 that includes Iowa and California.
49. In response to data request question number 6, Integrated Path states that it is not currently providing retail services in the state of Florida. However, in the Lifeline Compliance Plan (March 10, 2016) filed with the FCC, Integrated Path states that Integrated Path is providing retail and Lifeline services in Florida. Please explain.
50. In response to data request question number 10, Integrated Path states that Brian Shepard is the sole member and sole owner of Integrated Path. How many employees does Integrated Path have now? Does Integrated Path plan to hire additional employees as the business grows, assuming it is granted the requested designation?
51. Question number 37 of staff's first data request asks if Integrated Path will be using sub-contractors to provide required services. In response to Question number 37, Integrated Path

Mr. Brian Shepard

Page 3

April 21, 2016

states it would not. How does Integrated Path plan to handle large volumes of customer requests, etc., if there is no third-party assistance? Will Integrated Path have a call center? Please explain.

52. Please provide a list of all bundles that Integrated Path intends to offer residential customers in Florida.
53. Regarding Integrated Path's response to question number 33, how much is the reconnect fee that Integrated Path charges customers that it passes through from AT&T? Please explain the pass through in more detail. Integrated Path also states that customers could agree to payment plans to bring their accounts current. Does Integrated Path handle the reconnect fee and/or payment plan any differently for retail customers than it does for Lifeline customers? If so, please explain the difference.
54. Has Integrated Path received ETC designation in any other state than Wisconsin since the responses from the first data request were sent? Also, has Integrated Path recently applied in any other state(s)? If so, please identify the state(s) and docket number(s).
55. Please provide status updates for open dockets for ETC designations in New York and Texas.
56. Has Integrated Path received any federal universal service support from USAC as of April 2016? If yes, how much has Integrated Path received broken down by High Cost and Lifeline?
57. Integrated Path mentions in its response to staff's data request question 39 that it would be able to receive High Cost support in rural rate centers where it installs physical infrastructure to provide services to customers. Please provide information regarding the location and type of physical infrastructure Integrated Path has installed.
58. In its response to staff's first data request question number 40, Integrated Path states that if it were unable to receive High Cost support, it would "limit the investment that Integrated Path would be willing to make in higher cost rural rate centers." Please elaborate on that statement. Would Integrated Path still seek ETC designation in Florida if it could not receive High Cost support?
59. Please review Integrated Path's response to question number 21 in the first data request sent by staff and update as appropriate. Please indicate if Integrated Path has contacted the Seminole tribe. If Integrated Path has made such contacts, please provide the name and contact information along with any documentation that may have been obtained as a result.

## Catherine Beard

---

**From:** Catherine Beard  
**Sent:** Friday, June 03, 2016 6:14 PM  
**To:** 'bshepard@ipc-llc.com'  
**Cc:** Beth Salak; Greg Fogleman  
**Subject:** 3rd Data Request for Docket No 160016 final.docx  
**Attachments:** 3rd Data Request for Docket No 160016 final.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good evening,

Attached is Staff's 3rd data request regarding the petition for designation as an Eligible Telecommunications Carrier filed in, Docket No. 160016-TX (Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.). A hard-copy was sent to you as well, via US Mail. Please respond by June 17, 2016. Thank you!

Catherine Beard  
Florida Public Service Commission  
Public Utility Analyst II  
(850) 413-7080  
(850) 413-7081 fax  
[cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us)

### **3<sup>rd</sup> Data Request for Docket No. 160016-TX**

60. For purposes of your responses to staff's questions in this docket, please define and differentiate the following terms: "Provide" and "Offer."
61. In response to staff's data request question number 49, Integrated Path states that it "... has just started marketing retail services within the State of Florida." Please indicate when Integrated Path started marketing its retail services in Florida by geographic market, the form(s) of marketing used, and provide examples of marketing material used in Florida.
62. Will Integrated Path file a revision to its March 10, 2016 Compliance Plan with the Federal Communications Commission (FCC) to clarify that at the time, Integrated Path did not have: 1) any residential customers in Florida, and 2) approval as an Eligible Telecommunications Carrier (ETC) in Florida? If no, explain why.
63. In response to question number 46, Integrated Path stated that it was approved to provide low income only support in Wisconsin with authority to provide telecommunications on Tribal lands in Wisconsin. Is Integrated Path currently providing Lifeline service in Wisconsin? If yes, please specify the number of customers on 1) Non-Tribal and 2) on Tribal lands for the most recent month that data is available.
64. Does Integrated Path have any plans to revise its website to more prominently advertise the availability of Lifeline services?
65. Will Integrated Path have an online application or a link to the Florida Lifeline application if it is granted ETC designation?
66. Does Integrated Path agree that Tribal Link Up is a onetime reimbursement and not an ongoing monthly reimbursement per household? If not, please explain.
67. Please see Integrated Path's response to staff's data request question 47. Integrated Path's response states: "Integrated Path has not received any High-Cost Support to date. The company has requested High-Cost Support in New York as well as Florida." Has Integrated Path requested High-Cost Support 1) only in New York and Florida, 2) in all states where an ETC designation is sought, or 3) in the following states (please specify)?
68. Please see Integrated Path's response to staff's data request question number 39 and 57. Please identify the specific federal High-Cost program(s) Integrated Path asserts that it would receive support from if ETC designation is granted in AT&T Florida's service territory during the current phase of the Connect America Fund Phase II support?
69. Please see Integrated Path's response to staff's first data request question number 21. In this response, Integrated Path states it is seeking ETC designation for the Seminole tribe and identifies the three counties for which the Seminole tribe has reservations. In its application, Integrated Path is requesting ETC designation only for the rate centers identified in attachment A of its petition. For each reservation listed in the answer to

question number 21, please identify the rate center and associated CLLI code that services the tribal reservations Integrated Path seeks to serve as an ETC. For each tribal area identified, please indicate if they also service areas outside of the federal recognized Tribal lands.

70. Please review, 47 C.F.R. § 54.414. Does an ETC have to actually receive High-Cost support in a given area in order for it to receive Tribal Link Up support or can an ETC only be eligible to receive High-Cost support in an area in order to receive Tribal Link Up support, or other? Please explain.
71. Pursuant to 47 U.S. Code § 214(e)(6), state commissions must have independent state authority to designate a carrier as an ETC.<sup>1</sup> Please identify any State of Florida rule or law identifying regulatory jurisdiction of the PSC to designate a carrier as an ETC in federally recognized tribal lands.
72. The Federal Communications Commission (FCC) has stated that “a carrier should consult with the relevant tribal authority and/or state commission on whether the state commission has jurisdiction to designate the carrier.”<sup>2</sup> Please provide the result of such discussion with the Seminole Tribe and the name and contact information for a tribal representative authorized to speak for the Tribe on this matter.

---

<sup>1</sup> See *Twelfth Report and Order and Further Notice*, 15 FCC Rcd 12208, para. 99, 102-103.

<sup>2</sup> *Id.* at para. 103



## Catherine Beard

---

**From:** Catherine Beard  
**Sent:** Wednesday, August 17, 2016 3:43 PM  
**To:** 'bshepard@ipc-llc.com'  
**Cc:** Greg Fogleman; Beth Salak; Charles Murphy; Bianca Lherisson  
**Subject:** Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.  
**Attachments:** 4th Data Request.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good evening,

Attached is Staff's 4th data request regarding the petition for designation as an Eligible Telecommunications Carrier filed in, Docket No. 160016-TX (Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.). A hard-copy is being mailed to you as well, via certified US Mail. Please respond by August 30, 2016. Thank you!

Catherine Beard  
Florida Public Service Commission  
Public Utility Analyst II  
(850) 413-7080  
(850) 413-7081 fax  
[cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us)

COMMISSIONERS:  
JULIE I. BROWN, CHAIRMAN  
LISA POLAK EDGAR  
ART GRAHAM  
RONALD A. BRISÉ  
JIMMY PATRONIS

STATE OF FLORIDA



OFFICE OF TELECOMMUNICATIONS  
BETH W. SALAK  
DIRECTOR  
(850) 413-6600

## Public Service Commission

August 17, 2016

Mr. Brian Shepard  
President  
Integrated Path Communications, LLC  
9030 State Route 22, Suite 3  
Hillsdale, NY 12529-5060

CERTIFIED NO. 70060100000311009015

**Re: 4<sup>th</sup> Data Request for Docket No. 160016-TL – Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.**

Dear Mr. Shepard:

After reviewing your responses to staff's data requests dated March 18, 2016, May 6, 2016, and June 17, 2016, we have concluded that several responses are not complete. Continued omissions will result in a recommendation to deny your petition.

In addition, the Applicant Certification page that was included in staff's first data request was not completed and returned. The Applicant Certification page states that the applicant understands, and will abide by all rules and statutes and requires the signature of the applicant or an officer of the company. This certification is required of all eligible telecommunications carriers to be considered for ETC designation in Florida. Please provide a written response to each of the questions in the attached data request and return the completed Applicant Certification page on or before August 30, 2016.

Your company may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request.

If you have any questions, please contact Catherine Beard at (850) 413-7080 or [cbeard@psc.state.fl.us](mailto:cbeard@psc.state.fl.us) or Greg Fogleman at (850) 413-6574 or [gfolema@psc.state.fl.us](mailto:gfolema@psc.state.fl.us).

Respectfully,

A handwritten signature in black ink that reads "Beth W. Salak".

Beth W. Salak  
Director

**4<sup>th</sup> Data Request for Docket No. 160016-TX**

73. Please confirm that Integrated Path Communications, LLC. (Integrated Path) currently operates in the following states: Florida, Kentucky, New York, Vermont, Wisconsin, Oklahoma, Texas, California, and Oregon. If this list is incomplete or incorrect, please identify any other states that Integrated Path is currently operating in or any state that should be removed from the list. This was asked in questions 1 and 44.
74. Please confirm that Integrated Path is currently designated as an Eligible Telecommunications Carrier (ETC) in the following state: Wisconsin. If this list is incomplete, please identify any other states that Integrated Path is an ETC. This was asked in question 2.
75. Please see Integrated Path's response to question 67. It indicates that Integrated Path is approved to receive High Cost support in New York and Texas. Is Integrated Path an ETC in those states? If not, how can it be eligible to receive High Cost support?
76. Integrated Path's response to staff's question 19 provides a general outline regarding your marketing strategy (i.e., attending community events, telemarketing sales, print media, and distribution partnerships). Please provide examples of such marketing material.
77. Integrated Path's response to staff's question 64 indicates that Integrated Path is in the process of updating its website to include its Lifeline service products. Please describe what changes have been made since your response, or what changes will be made and when you expect to have those changes completed.
78. Integrated Path's response to staff's question 49 states that Integrated Path has "just started marketing retail services within the State of Florida." This was followed up by question 61. Please indicate when Integrated Path started marketing its retail service in Florida by geographic market, the form(s) of marketing used, and provide examples of marketing material used in Florida.
79. For June 17, 2016 and August 1, 2016, how many residential and business customers does Integrated Path serve in Florida? For each customer class listed above, please indicate what percent is provided through resale, unbundled network elements, or network facilities deployed by Integrated Path. For each customer class listed above, please list what percentage of customers is serviced by wireline, mobile wireless, fixed wireless, VoIP or other service. .
80. For June 17, 2016 and August 1, 2016, how many residential and business customers does Integrated Path serve in AT&T Florida's territory? For each customer class listed above, please indicate what percent is provided through resale, unbundled network elements, or network facilities deployed by Integrated Path. For each customer class listed above, please list what percentage of customers is serviced by wireline, mobile wireless, fixed wireless, VoIP or other service.

Mr. Brian Shepard

Page 3

August 17, 2016

81. On May 27, 2016, Integrated Path emailed staff a letter addressed to the Seminole Tribe of Florida. This was related to question 59 of staff's questions. Has anyone from the Seminole Tribe of Florida responded to your letter? If so, please provide a copy.
82. Integrated Path's response to staff's question 69 lists the wire centers for the Seminole Tribal area. For each wire center identified, please indicate if the wire center also services areas outside of the federally recognized Tribal lands.
83. Integrated Path's response to staff's question 10 identifies "Brian Shepard as the sole member and owner of Integrated Path." Included in question 10, staff asked if those identified are also owners, corporate officers, or employees of any other telecommunications companies. Please provide an answer.
84. Integrated Path's response to staff's question 50 addresses the number of staff associated with the company. For those staff members that are managers, please indicate if any have been:
  - a. Involved in bankruptcy proceedings
  - b. Convicted of a criminal offense
  - c. Involved in civil litigation in which they have been deposed or been a plaintiff, a defendant, or a witness
85. Integrated Path's response to question 57 notes that Integrated Path has its "own facilities switch." Please describe this switch in terms of brand, make, model, capacity, and types of services that can be provisioned. Please specify if Integrated Path owns this switch or if it leases it.

## APPLICANT CERTIFICATION

State of \_\_\_\_\_  
County of \_\_\_\_\_

My name is \_\_\_\_\_, I am employed by \_\_\_\_\_, located at \_\_\_\_\_ as its \_\_\_\_\_ . I am an officer of the Company and am authorized to provide the following certifications on behalf of the Company. This certification is being given to support the wireline Eligible Telecommunications Carrier petition filed by my Company with the Florida Public Service Commission (PSC).

Company hereby certifies the following:

1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers (ETC), and the Florida Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding federal Universal Service Program.
3. Company agrees that the Florida PSC may revoke a carrier's ETC designation for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for the company to retain ETC designation.
4. Company understands that if its petition for ETC designation is found to be in the public interest and approved by the PSC, it is based upon the information provided to the PSC in its petition. If there is a future change of company ownership, the company understands that the new owners must file a petition with the PSC prior to offering or getting USF or Lifeline, prior to the change of ownership and also make a showing of public interest to maintain the ETC designation.
5. Company understands that it may only receive reimbursement from the Universal Service Administrative Company (USAC) for active customer access lines which are provided using its own facilities or a combination of its own facilities and access lines obtained as UNEs from another carrier.
6. Company understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers. Company agrees to maintain records to document compliance with all federal and state requirements governing the Lifeline program for as long as the consumer receives Lifeline service plus five years.

7. Company understands that Lifeline certification forms must be signed by applicants confirming that they participate in a qualifying Lifeline-eligible program prior to that customer being enrolled in the Florida Lifeline program. If a Lifeline applicant uses income-based eligibility, the company will require documents showing proof of income before customer eligibility is granted.
8. Company agrees that it will not file a request for any low-income reimbursement at USAC without having customer-signed Lifeline certification applications on file at its office supporting amounts requested on USAC's Form 497.
9. Company agrees it will submit to the PSC a copy of Form 497s filed with USAC, and will make available supporting signed customer Lifeline certifications upon request to:  
  
 Florida Public Service Commission  
 Office of Telecommunications  
 2540 Shumard Oak Drive  
 Tallahassee, Florida 32399-0850
10. Company agrees that it will file a copy its annual reporting requirements for High-Cost support recipients pursuant to 47 C.F.R. 54.313 with the PSC.

**I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.**

Signature	Date
Printed Name	
Business Address:	

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Integrated Path Communications, LLC Compliance Plan	)	)

**INTEGRATED PATH COMMUNICATIONS COMMUNICATIONS, LLC'S  
COMPLIANCE PLAN**

**I. INTRODUCTION**

Integrated Path Communications is a New York limited liability company. Integrated Path Communications will provide prepaid wireless telecommunications services to consumers by using the network of its underlying carrier(s), currently Sprint Spectrum L.P. ("Sprint") through an MVNO agreement with 321 Communications Inc. The Company will obtain from Sprint the network infrastructure and transmission facilities to allow Integrated Path Communications to operate as a Mobile Virtual Network Operator ("MVNO").

Integrated Path Communications is financially and technically capable of providing Lifeline-supported services.<sup>1</sup> Integrated Path Communications currently provides local landline telecommunications services to both Lifeline and non-Lifeline customers in New York, Texas, Florida, Iowa and California. Integrated Path Communications provides a prepaid wireless product for non-Lifeline customers. Integrated Path Communications is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. In the event that

---

<sup>1</sup>See Order at ¶ 387.

USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers.

Integrated Path Communications, LLC (“Integrated Path” or the “Company”) is a prepaid wireless telecommunications carrier seeking designation as an Eligible Telecommunications Carrier (“ETC”) solely for the purpose of participating in the Lifeline program. Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission (“FCC” or “Commission”) has forbore from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.<sup>2</sup> Integrated Path will avail itself of the FCC’s conditional grant of forbearance, hereby files its Compliance Plan outlining the measures it will take to implement the conditions of forbearance outlined in the *Order*.<sup>3</sup>

## II. BACKGROUND

In the *Order*, the Commission 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:<sup>4</sup>

- (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,

---

<sup>2</sup>*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) (“*Order*”).

<sup>3</sup> Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A), the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state, particularly for purposes of state universal service funding under state program rules and requirements. The Company 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.

<sup>4</sup>See *Order* at ¶¶ 368, 373 and 379.



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 that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

### **III. INTEGRATED PATH COMMUNICATIONS WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER**

Integrated Path will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.<sup>5</sup>

#### **A. Access to 911 and E911 Services**

In the *Order*, the Commission requires Integrated Path to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.<sup>6</sup> The Commission and consumers are hereby assured that all Integrated Path customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Integrated Path handsets even if the account associated with the handset has no minutes remaining.

#### **B. E911-Compliant Handsets**

The Commission also conditioned its grant of forbearance determination on Integrated

---

<sup>5</sup>To the extent that future changes in federal regulations render the commitments herein invalid, the Company reserves the right to modify its operations in accordance with federal regulations in effect at that time.

<sup>6</sup>See *Order* at ¶ 373.

Path providing only E911-compliant handsets to its Lifeline customers.<sup>7</sup> Integrated Path will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing Integrated Path customer does not have an E911-compliant handset, the Company will replace it with a 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well.

### **C. Consumer Eligibility and Enrollment**

Integrated Path will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility, Integrated Path will rely on the state identification or database.<sup>8</sup> In instances where Integrated Path is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

#### **1. One-Per-Household**

Integrated Path understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as "any individual or group of individuals who are living together at the same address as one economic unit."<sup>9</sup> Upon receiving an application for Lifeline support, Integrated Path will check the National Lifeline Accountability Database ("NLAD"), to determine whether an individual at the applicant's residential address is currently receiving Lifeline-supported service.

#### **2. Initial and Annual Certification**

---

<sup>7</sup>See *id.*

<sup>8</sup>See *Order* at ¶ 98.

<sup>9</sup>See *Order* at ¶ 74.

Enrollment in person. The Company will primarily enroll Lifeline applicants through its website, [www.ipc-llc.com](http://www.ipc-llc.com) and through company events. When a prospective customer applies at an event, Company employees, agents or representatives (“personnel”) will ask to see a government issued ID and will validate the address via a USPS/Melissa Database. The Company will check the National Lifeline Accountability Database, the Company will input the name/address combination into the Company’s internal database to confirm that the applicant is not already receiving a Lifeline subsidy from Integrated Path. If the customer indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC’s one-per-household template as well. In cases where an eligibility database exists, personnel will query the database to determine eligibility. In states where eligibility databases are not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. Eligibility documents are returned to the customer after review. Finally, Integrated Path personnel will verbally review all certifications and disclosures with the applicant before they sign the application form, making sure the applicant verbally acknowledges each required certification before moving on to the next. Upon successful completion of the certification process, the customer is allowed to receive their free phone in person. In instances where eligibility databases cannot be accessed in real-time, Integrated Path will mail the phone to eligible customers once verification of eligibility is complete. Customers will be instructed to call the Company when they receive the phone in order to activate their account; this activation call will capture the customer’s name and unique identifier (i.e. last four digits of SSN) in order to verify that the person activating the phone is the intended recipient.

Enrollment online. When enrolling via the Internet, prospective customers will be able to fill out an application form online and sign electronically. Integrated Path will highlight the

certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.<sup>10</sup> If the customer indicates that their address is a multi-household residence, online interface will require the applicant to complete USAC's one-per-household template as well. If no eligibility database is available, the online interface will advise the applicant that they are required to provide proof of identity verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company as well as what documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). If no eligibility database is available, the application will be placed in a "hold" status until the Company receives copies of the applicant's proof documentation and government-issued ID, at which point Company personnel will review the documentation. Integrated Path will destroy copies of proof documentation and deliver phones to eligible customers by mail. Customers will be instructed to call the Company when they receive the phone in order to activate their account; this activation call will capture the customer's name and unique identifier (i.e. last four digits of SSN) in order to verify that the person activating the phone is the intended recipient.

### **3. Annual Re-Certification**

Integrated Path understands that it must annually re-certify the eligibility of its entire Lifeline subscriber base and report the results to USAC, and the Company may elect to perform this re-certification on a rolling basis throughout the year.<sup>11</sup> Each year, Integrated Path will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in

---

<sup>10</sup> See Order at ¶ 123.

<sup>11</sup> See Order at ¶ 130.

writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.<sup>12</sup>The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. Integrated Pathwill obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Integrated Pathunderstands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.<sup>13</sup>

Alternatively, where a database containing consumer eligibility data is available, Integrated Path(or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, Integrated Pathwill contact the subscriber every year during the annual certification process to obtain a valid address.<sup>14</sup>Integrated Pathunderstands that it may elect to have USAC administer the self-certification process on the Company's behalf.<sup>15</sup>

Integrated Pathwill certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for reimbursement. As part of Integrated Path's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

(1) that the Company has procedures in place to review consumers'

---

<sup>12</sup>*See id.*

<sup>13</sup>*See Order at* ¶ 132.

<sup>14</sup>*See Order at* ¶ 131.

<sup>15</sup>*See Order at* ¶ 133.

documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state, and

(2) that the Company is in compliance with all federal Lifeline certification procedures.<sup>16</sup>

**D. De-Enrollment**

If at any time aIntegrated PathLifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-enrollment requests. Integrated PathLifeline customers simply call the Company, via 611 or the toll-free customer service number, and they can speak to a live operator to de-enroll from Integrated Path's Lifeline program. Integrated Pathwill de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

Ineligibility.Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).<sup>17</sup>

If a customer does not respond to the Company's annual verification survey within 30 days, or if Integrated Pathhas reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Integrated Pathwill provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the

---

<sup>16</sup>SeeOrderat ¶ 126-27.

<sup>17</sup>SeeOrderat ¶ 122.

letter to demonstrate that his or her Lifeline service should not be terminated.<sup>18</sup> Similarly, Integrated Pathwill de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.<sup>19</sup>

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,<sup>20</sup> Integrated Pathwill de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. Integrated Pathwill de-enroll any subscriber that has not used the Company's Lifeline service for 60 consecutive days, as discussed in section IV.B above. Integrated Pathwill provide the subscriber 30 days' notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be initiated after 30-days of non-usage. Integrated Pathwill update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.<sup>21</sup>

Integrated Pathwill not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, Integrated Pathwill not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.<sup>22</sup> Integrated Pathwill notify its subscribers at service initiation, via the certification form and via script that is reviewed

---

<sup>18</sup> *See id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

<sup>19</sup> *See Order at* ¶ 89.

<sup>20</sup> *See Order at* ¶ 214-16.

<sup>21</sup> *See Order at* ¶ 257.

<sup>22</sup> *See Order at* ¶ 257.

with every customer, about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.<sup>23</sup> An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.<sup>24</sup> Integrated Pathwill notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the Company's internal procedures. Integrated Pathwill continue to comply with applicable public safety, including transmitting 911 calls to the appropriate PSAP even if the Company is no longer providing Lifeline service to a consumer.<sup>25</sup>

#### **E. Lifeline Offering**

Integrated Pathwill offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, currently Sprint.<sup>26</sup> As summarized in Exhibit E attached hereto, the Company's Lifeline offering will provide customers with 250 minutes of talk and text per month at no charge.<sup>27</sup> Lifeline customers will have access to voicemail, caller I.D. and call waiting services at no charge, even after their initial allotment of included minutes has

---

<sup>23</sup> *See id.*

<sup>24</sup> *See Order at* ¶ 261.

<sup>25</sup> *See Order at* ¶ 262. 911 transmission will actually be performed by the Company's underlying facilities-based CMRS provider.

<sup>26</sup> The Company reserves the right to alter the proposed Lifeline rate plans on a state-by-state basis, particularly as required by state public utility commissions (PUC). The Company commits to pass through the entire Lifeline subsidy amount directly to the consumer.

<sup>27</sup> The Company may alter its Lifeline offering as necessary on a state-by-state basis, particularly as required by state public utility commissions.



been consumed. Airtime minutes are not deducted for calls to customer service (via 611 or the toll free number) or calls to 911; customers may place calls to 911 for free, regardless of account balance or activation status. Customers are not bound by a local calling area requirement; Integrated Path provides domestic long distance at no extra charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Integrated Path currently blocks roaming and international calling features, so Lifeline customers are not at risk for incurring unexpected charges for these features. Integrated Path does not impose burdensome credit checks or long-term service contracts. Integrated Path'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.

**IV. CONCLUSION**

Integrated Path submits that its Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Accordingly, Integrated Path respectfully requests that the Commission expeditiously approve its Compliance Plan so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Integrated Path, LLC

Dated March 10, 2016

**Exhibit A**

Sample Lifeline Certification Form

**Integrated Path Communications  
(STATE) Lifeline Service Application and Certification**

Mail completed and signed form to:  
9030 State Route 22 Suite 3 Hillsdale NY 12529  
Customer Service: 888-224-6958

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Integrated Path Communications' (IPC's) 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.

**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. 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.

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

**Customer eligibility certification:** I hereby certify that I participate in at least one of the following programs (check one):

- |   |  |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines     |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR)  |
| <input type="checkbox"/> Medicaid (not Medicare)                            | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA)         |
| <input type="checkbox"/> Supplemental Security Income (SSI)                 | <input type="checkbox"/> Tribally Administered TANF (TATNF)                        |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)     | <input type="checkbox"/> Head Start (meeting income qualifying standards) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) |  |
| <input type="checkbox"/> National School Lunch Program's free lunch program |  |

**Tribal eligibility:**

I hereby certify that I reside on Federally-recognized Tribal lands.

**Customer Application Information:**

First Name: \_\_\_\_\_ Middle Name: \_\_\_\_\_ Last Name: \_\_\_\_\_  
Date of Birth ("DOB"): Month: \_\_\_ Day: \_\_\_ Year: \_\_\_\_\_ Last Four Digits of Social Security Number (or Tribal ID Number): \_\_\_\_\_  
If Qualifying for Lifeline by Income: Income Level : \_\_\_\_\_ AND Number of Individuals in the Household: \_\_\_\_\_  
Home Telephone Number (if available): \_\_\_\_\_

**Residential Address (P.O. Box NOT sufficient)**

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Address is (choose one):  Permanent  Temporary

**Billing Address (if different from Residential Address) (P.O. Box IS sufficient)**

Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Multiple households sharing and address:**

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete and include with this application multiple household worksheet.

**Activation and usage requirement disclosures:** To keep your account active, you must use your Lifeline service at least once during

any 60 consecutive day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 consecutive days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

I hereby certify that I have read and understand the disclosures listed above regarding the Lifeline service activation and usage requirements.

**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, address, DOB, Lifeline enrollment and termination dates and the means through which the applicant qualified for Lifeline (i.e. Medicare or income)), 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.

**Additional certifications:** I hereby certify, under penalty of perjury, that (check each box):

- I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- 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
- I am not listed as a dependent on another person's tax return (unless over the age of 60)
- The address listed below is my primary residence, not a second home or business
- If I move to a new address, I will provide that new address to the Company within 30 days
- If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- 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
- The information contained in this certification form is true and correct to the best of my knowledge

**Applicant's Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed and provide information requested; do not copy or retain documentation):**

**Documents Acceptable Proof for Income-Eligibility (check 1):**

- 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.

**List B - Choose 1:**

- Program participation card/document
- Prior year's statement of benefits
- Notice letter of participation
- Other official document evidencing participation \_\_\_\_\_

Last 4 digits of Document from List B \_\_\_\_\_

Date of Proof Document: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Expiration Date of Proof Document: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**Documents/Benefit Cards Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):**

**List A - Choose 1**

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Section 8 Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards)

Applicant Account Number	Rep/Agent Signature

**Exhibit B**

Sample Advertisements

# **Wireless Phone Service**

## **Pay Nothing to Start Service**

**250 Free Minutes every month for local  
and national long distance calls,  
Texting, and More!**

**INTEGRATED PATH COMMUNICATIONS**

**If you or any other member of your household  
receive:**

**Medicaid - Food Stamps - TANF - SSI -  
Federal Housing Assistance - Low Income Energy –  
Head Start - School Lunch Program**

Lifeline is a government benefit program. Only eligible customers may participate in the Lifeline program and participation is limited to one benefit per household consisting of either wireline or wireless service. Documented proof of participation in a government assisted program or income qualification is required for enrollment. Lifeline service is non-transferable.

**1-888-224-6958**

**Exhibit C**

Lifeline Terms and Conditions



## TERMS AND CONDITIONS

### **Integrated Path Communications Terms and Conditions of Service**

Integrated Path Communications residential home phone service is brought to you by Integrated Path Communications, Integrated Path Communications provides both Non-Lifeline and Lifeline Assisted services. The Lifeline Assistance program is supported by the federal Universal Service Fund program and is administered by the Universal Service Administrative Company. These Terms and Conditions of Service apply to Integrated Path Communications provided services. Please read these terms carefully as these Terms and Conditions of Service become effective by activating or using services provided by Integrated Path Communications and is a legally binding agreement between you and Integrated Path Communications. These Terms and Conditions of Service contain important information about your consumer rights. Integrated Path Communications reserves the right to change or modify the Terms and Conditions of Service at any time and at its sole discretion.

### **Lifeline Support**

Lifeline Support is a monthly support that reduces the cost of monthly residential home telephone service. An eligible Integrated Path Communications customer may receive a lifeline discount, but the lifeline discount is available for only one telephone connection per household. Lifeline support may vary between states.

Eligibility for the Integrated Path Communications lifeline service program varies by state. Subscribers may qualify for a Integrated Path Communications lifeline program if they participate in one of the government programs listed below or may qualify based on household income eligibility standards as defined below. By completing the Integrated Path Communications application, a subscriber's consent is required to the release of required information, including financial information if necessary, to a designated agent as required for the administration of your Integrated Path Communications lifeline service. This consent survives the termination of this agreement. Integrated Path Communications reserves the right to review any subscriber's continued eligibility for the lifeline program, at any time, and may require subscribers to provide Integrated Path Communications with written documentation of either subscriber household income or subscriber's participation in a qualifying state or federal program. A subscriber may only participate in one lifeline program at the subscriber's principal place of residence. If a subscriber or any member of a subscriber's family participates in a lifeline program from another provider, the subscriber is responsible for notifying the other provider that they have been approved for a Integrated Path Communications lifeline program. Notice to terminate service from any other provider's lifeline program must be given after activating new service in the Integrated Path Communications lifeline program.

Integrated Path Communications subscribers may qualify for a lifeline service offering if the subscriber meets certain state and federal eligibility requirements. These requirements are determined by the particular state where the subscriber resides. These state and federal eligibility requirements are also based on either program based eligibility or income based eligibility.

### **Program Based Eligibility**

Program based eligibility varies by state. Integrated Path Communications subscribers are eligible to receive lifeline discounts, under the program based eligibility, if they participate in one or more of the following programs and the state participates in that program:

Food Stamps (program may be named differently by state) Medicaid Low Income Home Energy Assistance Program (LIHEAP) National School Lunch programs (free lunch programs) Federal Public Housing Assistance as Section 8 Supplemental Security Income (SSI) Temporary Assistance for Needy Families Program (TANF)

### **Income Based Eligibility**

Income based eligibility varies by state. Some states do not offer income based eligibility for lifeline. Integrated Path Communications subscribers are eligible to receive lifeline discounts, under the income based eligibility; if subscriber's total combined household income meets the defined U.S. Government Income Poverty Guidelines. Proof of income documentation (such as a current tax return) must be provided to Integrated Path Communications to demonstrate eligibility income based eligibility.

### **Integrated Path Communications Lifeline Program Restrictions**

Subscribers applying for service in a Integrated Path Communications lifeline program agree to, and declare under penalty of perjury, that all of the following conditions below apply (but not limited to):

The Integrated Path Communications lifeline program is limited to one connection per household

Subscriber applying for service certifies that subscriber does not participate in any other lifeline program.

Subscriber applying for service may be required to provide a Social Security Number in order to certify or verify eligibility for lifeline service. (Social Security information is strictly confidential and will not be disclosed to others without a subscriber's written consent)

If subscriber participates in another lifeline program at the time applying for Integrated Path Communications lifeline service, the subscriber agrees to cancel lifeline service with any other provider.

Subscriber agrees to immediately notify Integrated Path Communications of any address change.

Subscriber affirms they meet the head of household requirement.

Subscriber affirms they are least 18 years old.

Subscriber affirms they are not claimed as a dependant on another person's tax returns.

Subscriber affirms they will immediately notify Integrated Path Communications if they no longer participate in at least one of the state or federal programs required to receive lifeline discounts.

Subscriber authorizes representatives of any state or federal assistance program to discuss or provide documentation needed to verify participation requested by Integrated Path Communications Subscriber also authorizes any state or federal assistance programs representatives to verify subscriber's eligibility for lifeline programs.

Subscribers applying for the lifeline program authorize Integrated Path Communications, or its duly appointed representative's to have access to records relating to the applicant to verify eligibility for the Integrated Path Communications lifeline program.

Subscribers applying for Integrated Path Communications lifeline programs affirm, under penalty of perjury, that all foregoing representations made when applying for service are true and correct to the best of the subscriber's knowledge.

### **Annual Recertification, Verification, or Termination of Lifeline Programs**

Subscribers participating in the Integrated Path Communications lifeline program will be required to re-certify, on an annual basis, their qualification to continue to participate in lifeline programs based on the appropriate state or federal re-certification or verification requirements. Integrated Path Communications reserves the right to determine, at its sole discretion, if a subscriber meets the annual re-certification or verification requirements and if the subscriber fails to re-qualify for lifeline service. If Integrated Path Communications is unable to re-certify or verify the required lifeline qualifications the subscriber will be deemed ineligible to further participate in Integrated Path Communications lifeline programs. If a subscriber is deemed ineligible for Lifeline, then subscriber's Lifeline discount will be discontinued and subscriber will be billed the normal rate without any lifeline discount. Subscriber's plan may be changed in favor of a new plan to be chosen by the subscriber. The subscriber will be eligible to choose from any then available plan under the applicable terms and conditions for that plan.

Integrated Path Communications reserves the right to cancel or suspend, without notice, a subscriber's account for any fraudulent related reasons or upon the request of any state or federal authority's request. Integrated Path Communications subscribers have the ability to terminate from the lifeline program for any reason. Subscribers who choose to terminate from the lifeline program are required to send notice of termination in writing to the address below or by fax. Upon termination from the program, subscribers will no longer receive any lifeline discount and will be required to re-qualify for lifeline qualifications if they choose to enroll with another Integrated Path Communications lifeline program.

By accepting these Terms and Conditions of Service, you represent that you are at least 18 years of age, you meet the eligibility requirements for Integrated Path Communications service, and you agree that you may not assign your rights or delegate any of your duties under these terms without the prior written consent of Integrated Path Communications. Any attempted assignment or delegation without proper consent from Integrated Path Communications shall be void.

### **Supported Services**

The following supported services are available to Integrated Path Communications subscribers who participate in lifeline programs

1. Voice grade access to the public switched network.
2. Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the public telecommunications network, shortening call set-up time;
3. Single-party service or its functional equivalent.
4. Access to emergency services. "Access to emergency services" is a service available to Integrated Path Communications subscribers that allows a subscriber to call to emergency services through a Public Service Access Point (PSAP) operated by the local government;
5. Access to operator services. "Access to operator services" is defined as having access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
6. Access to interexchange service. "Access to interexchange service" is defined as the user of the telecommunication service having access to complete a long distance call or a toll call;
7. Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes making available to customers, upon request, information contained in directory listings; and
8. Toll limitation for qualifying low-income consumers. "Toll limitation" Integrated Path Communications qualifying subscribers have the option to use their service to complete a long distance call or toll call in an amount of service that limits the amount of toll service to which the subscriber has already paid.

### **Integrated Path Communications Services**

Integrated Path Communications service is provided at the company's discretion. Integrated Path Communications may change pricing or the company's Terms and Conditions of Service, from time to time, without notice. Unless expressly prohibited by law, Integrated Path Communications reserves the right to modify or cancel a subscriber's service, an account, or take corrective action at any time and for any reason, including, but not limited to, your violation of any provision of these Terms and Conditions of Service. A subscriber's right to use Integrated Path Communications service is subject to Integrated Path Communications business practices, policies, procedures, rates and these Terms and Conditions of Service. Integrated Path Communications may change the Terms and Conditions of Service at any time. Integrated Path Communications will notify subscribers of any change to the Terms and Conditions of Service that are determined to be materially adverse to a subscribers service 30 days in advance of the change. If subscriber does not terminate service within 30 days of receiving this notice of a change in the Terms and Conditions of Service, subscriber agrees to accept any such changes.

Local phone numbers may not be available in all areas. Integrated Path Communications service is for personal use only and may not be used in a manner that interferes with another Integrated Path Communications customer's use of service. Integrated Path Communications services may not be used for any type of monitoring services, any data transmissions, or other non-personal related connections that do not consist of uninterrupted live dialogue between two individuals. A Integrated Path Communications subscriber account may be terminated, without notice, if a subscriber's usage is determined to be used in violation of the Terms and Conditions of Service for non-personal use, pager service, voicemail retrieval service, or other uses deemed inappropriate.

Integrated Path Communications services may be affected by limitations. Coverage is not available everywhere. Quality of service may be affected by conditions beyond Integrated Path Communications control, including atmospheric, geographical, or topographical conditions. Service may also be affected by damage to service network issues and outages. Integrated Path Communications does not guarantee, or warrant, that service will be available at any specific time or geographical location, or that service will be provided without possible interruption. You should therefore never solely rely on your phone for emergency calls, such as to 911. Integrated Path Communications customers have access to dial 911 in an emergency. However, occasionally a subscriber may attempt to call 911 in an area where there is no 911 coverage. If there is no 911 access available, a subscriber's call to 911 may not be available.

By applying or activating service with Integrated Path Communications, a subscriber agrees not to use Integrated Path Communications services in any way that is illegal, abusive, or fraudulent. This will be determined by Integrated Path Communications in its sole discretion.

### **Integrated Path Communications ETC Services**

Integrated Path Communications lifeline programs are only available for activation by customer's who reside in the areas in which Integrated Path Communications, has been designated as a Eligible Telecommunications Carrier ("ETC"). To receive subsidized service, a subscriber's principal residence address must be within a Integrated Path Communications ETC service area. To be eligible for Integrated Path Communications service, a subscriber must meet the applicable eligibility standards described throughout these Terms and Conditions of Service, which may be amended by Integrated Path Communications. Where applicable, Integrated Path Communications lifeline programs are provided to you by Integrated Path Communications and are governed by tariffs. Tariffs are on file with the appropriate public utility commissions in each state and supersede any term related to the Lifeline Assistance program. Integrated Path Communications may provide access to tariffs through its website. Please be aware that tariffs posted online may not be official documents and you assume full responsibility for any tariff information you access on the Integrated Path Communications website. Integrated Path Communications bears no liability for the accuracy of any documents available on this website.

### **Integrated Path Communications Taxes and Surcharges**

Integrated Path Communications charges state and local sales taxes. Pricing listed on the Integrated Path Communications website or listed in advertising methods for wireline service do not include certain taxes or

surcharges. Subscribers are responsible for all charges applicable to the use of Integrated Path Communications service regardless if the subscriber was the actual user of the service. The amount of these taxes and surcharges is subject to change and may vary from time to time and by geographic area. Integrated Path Communications collects sales taxes on all Additional Minutes Offering Plans and may also collect regulatory fees in certain states. Third party authorized retailers are responsible for collecting sales taxes and required regulatory fees for transactions that occur through such third party authorized retailers. Changes to a tax or surcharge will become effective as provided by the appropriate taxing authority and changes to applicable contribution amounts for Federal Universal Service Fund ("FUSF") will apply. Taxes and fees are subject to change without notice.

### **Integrated Path Communications Directory Assistance, Additional Charges and Services**

Directory assistance calls will be charged at an additional rate per call plus applicable usage charges. Calling to 900 / 976 numbers are not available to Integrated Path Communications subscribers. Placing calls to 800 / 866 / 877 or other toll-free numbers will be available to subscribers. Integrated Path Communications allows subscribers to make or receive domestic long distance calls inside the domestic USA as long as the subscriber has long distance available.

Integrated Path Communications will block any calls to 1-900, 1-976, some international calling, or other pay-per-call services.

If a subscriber's account is deactivated for any reason, Integrated Path Communications will assess subscribers a standard reactivation fee which is not refundable.

### **Integrated Path Communications Phone Number**

Integrated Path Communications subscribers must accept the number that is assigned to them at the time of activation. Integrated Path Communications may release a subscriber's phone number to another subscriber, without giving notice, if the subscriber cancels service with Integrated Path Communications, or if the account is deactivated. Subscribers may transfer a number prior to the number being reissued to another subscriber. Integrated Path Communications reserves the right to change a number at any time. Integrated Path Communications will attempt to notify the subscriber prior to any change. A subscriber can request to change a phone number for a number change fee.

In some situations, a subscriber may transfer an existing carrier telephone number to your Integrated Path Communications service for use as a Integrated Path Communications phone number. When a subscriber transfers from another carrier to Integrated Path Communications, they may have to pay a termination fee to the former carrier. Integrated Path Communications will not reimburse a subscriber for any termination fees imposed by other carriers.

### **Use of Integrated Path Communications Customer Information**

By agreeing to Terms and Conditions of Service herein, you also agree to the terms of Integrated Path Communications Privacy. The Privacy Policy may change from time to time and includes important information on what data we collect about you, how we use this data and with whom we share that data. Any "Customer Proprietary Network Information" (CPNI) data that Integrated Path Communications collects from subscribers will be handled in accordance with the Federal Communications Commission regulations, federal consumer privacy laws and the Integrated Path Communications Privacy Policy. Integrated Path Communications will not intentionally share subscriber's personal information without the subscriber's permission. Integrated Path Communications may, from time to time, use the information subscribers provide to market services to subscribers that may be related to Integrated Path Communications services or offerings. Subscribers will have the opportunity to choose whether they would like to receive text messages notices, email notices, or direct mail and other updates from Integrated Path Communications and its affiliates about new products, promotions, or other important services offered by Integrated Path Communications. Integrated Path Communications may disclose to law enforcement authorities and governmental agencies any information, including your name, account information, account history, or other information properly requested by law enforcement to comply with appropriate legal requests.

### **Dispute Resolution**

You agree to contact Integrated Path Communications with any disputes. You must contact Integrated Path Communications with any dispute. You must provide a description of the dispute, all relevant information, any supporting documentation, and the proposed dispute resolution. A Integrated Path Communications representative will contact you at the last address you have provided or by phone. Integrated Path Communications agrees to negotiate in good faith to resolve any dispute you may have. You agree to pay the full amount reflected on your account statement, even while a dispute is being resolved. If you do not reach an agreement to resolve your claim within 30 days after notice of dispute was given, you or Integrated Path Communications may commence a Binding Arbitration proceeding (see below).

This agreement shall be construed under the laws of the state of New York, without regard to its choice of law rules, except for the arbitration provision contained in these Terms and Conditions of Service, which will be governed by the Federal Arbitration Act. This governing law provision applies no matter where you (the subscriber) reside, or where you (the subscriber) use or pay for Integrated Path Communications services. To the extent permitted by law, if a dispute claim proceeds in court, Integrated Path Communications and you waive any right that we may have to trial by jury in any lawsuit or other proceeding.

### **Limitation of Liability**

Integrated Path Communications is not liable to you (subscriber) for any direct or indirect, special, incidental, consequential, exemplary or punitive damages of any kind, including lost or potential profits (regardless of whether it has been notified such loss may occur) by reason of any act or omission in its provision of equipment and/or Services. Integrated Path Communications will not be liable for any act or omission of any other company furnishing a part of our services, or our equipment or for any damages that result from any service or equipment provided by or manufactured by affiliated or non-affiliated third parties. Integrated Path Communications is not

responsible, at any time, and shall not be liable to you or anyone else for any personal information such as user names, passwords, contacts, pictures, SMS, or any additional content you may have stored on any Integrated Path Communications equipment or which may remain on Integrated Path Communications equipment during and/or after you no longer have service with Integrated Path Communications. Unless prohibited by law, you (subscriber) agree to limit claims for damages or other monetary relief against each other to direct and actual damages. Integrated Path Communications assumes no risk or responsibility for a subscriber's use of any content provided by Integrated Path Communications services. Integrated Path Communications is not liable for any act or omission of any third party company providing part of Integrated Path Communications services (this includes equipment provided by a third party), any errors or omissions of any vendors or agents participating in offers made by Integrated Path Communications, any damages that result from third parties, or any unauthorized or disputed charges. There is no fiduciary duty that exists between you (subscriber) and Integrated Path Communications or its affiliates. You (subscriber), also agree that Integrated Path Communications will not be liable for any missed voice mails, any messages from your voicemail system, any data content, or any storage or deletion of contacts from any address book provided by Integrated Path Communications.

### **Indemnification**

To the full extent by law, you agree to hold harmless and indemnify Integrated Path Communications and its affiliates and their respective officers, agents, directors, partners and employees, from any and all liabilities, settlements, penalties, claims, causes of action and demands brought by third parties (including any costs, expenses or attorneys' fees on account thereof), directly or indirectly, resulting from your use of Integrated Path Communications products and services, or another person whom you authorize to use your products or services, whether based in contract or tort (including strict liability) and regardless of the form of action. This obligation shall survive any expiration or termination of your service with Integrated Path Communications, Inc.

A subscriber may reside in a state that does not allow disclaimers of implied warranties or limits remedies for breach. Therefore, the above exclusions or limitations may not apply to all subscribers. A subscriber may have other legal rights that vary by state.

### **Warranties**

Integrated Path Communications does not manufacture phones or equipment used by subscribers. The only warranties applicable to such devices or equipment are those extended by the manufacturers. We have no liability, therefore, in connection with phones and other equipment or for manufacturers' acts or omissions. WE MAKE NO REPRESENTATIONS OR WARRANTIES, EXPRESS OR IMPLIED, REGARDING THE PRODUCTS AND SERVICES PROVIDED HEREUNDER OR ANY SOFTWARE REQUIRED TO BE USED IN CONNECTION THEREWITH, INCLUDING, BUT NOT LIMITED TO, AND TO THE EXTENT PERMITTED BY LAW, WARRANTY OF TITLE, WARRANTY THAT A PRODUCT OR SERVICE IS FIT FOR A PARTICULAR USE OR WARRANTY OF MERCHANTABILITY. WE EXPRESSLY DISCLAIM ANY AND ALL IMPLIED WARRANTIES. WE DON'T PROMISE ERROR-FREE OR UNINTERRUPTED SERVICE AND DON'T AUTHORIZE ANYONE TO MAKE WARRANTIES ON OUR BEHALF.



The Integrated Path Communications Terms and Conditions of Service, contained herein, supersede all oral or written communications and understandings between you, Integrated Path Communications with respect to products and services provided to you and the terms under which they are offered to you by Integrated Path Communications. The surviving sections of this Terms and Conditions of Service shall continue to be valid and enforceable in the event that any part of these Terms and Conditions of Service is declared invalid, not applicable, or becomes unenforceable. There are no provisions of these Terms and Conditions of Service that provide any person or any entity that is not a party to these Terms and Conditions of Service with any remedy, liability, claim, reimbursement, or any cause of action, or that creates any other third-party beneficiary rights. Any legal dispute, unless otherwise specified herein, shall be subject to the exclusive jurisdiction of the federal or state courts located within the State of New York. This excludes customers who are residents of the state of California.

Integrated Path Communications reserves the right to suspend or terminate any subscriber's access to Integrated Path Communications services or to the Integrated Path Communications website or affiliated websites, at any time, should we determine in our sole discretion that a subscriber has violated any of these Terms and Conditions of Service or any other policy of Integrated Path Communications, its affiliates, or for any other reason at the sole discretion of Integrated Path Communications.

**Exhibit D**

**Key Management Resumes**

## **BRIAN E. SHEPARD**

111 East 30<sup>th</sup> Street  
Suite 11C  
New York, NY 10016

Phone: 212-689-1098  
Cell: 212-380-7974  
[bshepard@ipc-llc.com](mailto:bshepard@ipc-llc.com) [brianshepard@hotmail.com](mailto:brianshepard@hotmail.com)

### ***EXPERIENCE***

#### **IBM/ Department Of Education**

**2/2010 to 6/2012**

##### **Consultant – Sr. Project Manager/Sr. Video Engineer**

As the key in-house Digital Video Subject Mater Expert (SME) I am responsible for the final determination that all IPDVS systems for the New York Department of Education meet the IPDVS design specifications and standards. The adherence process includes review of vendors' installations, which includes the Cisco Network infrastructure, Digital Video surveillance equipment, MPEG encoders, servers, video content servers and auxiliary video hardware, and servers/workstations operating systems within New York City schools.

- Serves as in-house expert and authority in IPDVS for multiple building environments. Consults on changes in network infrastructure and product/hardware selection.
- As a Project Manager overseeing vendors and applies quality assurance to the implementation, installation and verification of the component checkout process performed in a standard based environment for the IPDVS project. And delivers a status assessment report indicating whether each schools IPDVS system is accepted as complete or not.
- Documents modifications to configurations, tests and verifies solution functionality and determines and isolates problem source.
- Manages and maintains all individual acceptance reports along with an overall QA summary of all sites.
- Implements problem source identification/determination and technical support of all digital video surveillance cameras, MPEG encoders, Windows operating systems, Cisco switches, routers, firewalls and general network connectivity components at IPDVS sites citywide.
- Evaluates IPDVS application software configuration parameters associated with each unique school.
- Analyzes MPEG-4 encoder configuration, firmware level and port mapping documentation.
- Coordinates, provides, reviews and assures strict adherence to highly technical specifications and standards for all IPDVS systems.

#### **Ascent Media Group New York, NY**

**8/2008 to 1/2010**

##### **Global Manager of Operations and Engineering**

In conjunction with VP, Global Resources manage daily network operations of global DTM transport network as the principle operations expert

##### **Network Operations**

- Oversee DTM nodes, interconnections, service levels and provide Tier 1 and Tier 2 support to regional operation teams
- Issue work orders and oversee implementations based on network plans developed by my office or customer
- Developed and Managed capacity management process
- Performing root cause analysis and communicate to Sr. Staff outage results.

- Oversee network software and hardware upgrades across entire network including compatibility testing and managing release notes details, features and bug-fixes
- Identify and approve all groom and maintenance requests made by carrier-vendors. Submit all maintenance requests to operations centers and internal clients for approval/notification.
- In conjunction with NMS engineers coordinate integration of DTM functionality into NMS systems to provide appropriate capabilities
- Manage in-band DLE servers and clients and integration with management-telemetry network
- Network Implementation
- Execute and document the implementation of new internal and external service orders
- Execute and document the installation, testing and turn-up of new circuits (Data and Video) and new nodes for operational use
- Interface with key vendors and Telecom Manager for circuit orders and changes that impact network operations
- Provide Point Of Contact communications with internal and external customers regarding status of service implementations, trouble tickets and network health issues
- Develop Detail Design and budget based on sales initiative
- Managed budget and Provide input for network planning and budgeting purposes
- Technical Training
- Train engineering team in DTM network operations, service implementation and DTM transport technology services
- Train operations teams in basic DTM network operations and high-level troubleshooting

**VERIZON – Video Network Services Basking Ridge, NY**  
**Sr. Staff Consultant**

**12/2006 to 5/2008**

Responsible for engineering of video transmission and switching platforms for the delivery of FIOS TV service offering and related services on the national FTTP video network.

- Responsibilities include the engineering of area-wide and company-wide video network deployments, data transport, switching/routing systems including layer 3 migration
- Engineering of video headends, regional video hub office, medium haul networks, and video serving office ( i.e. central office) equipment.
- Issue work orders and oversee implementations based on network plans.
- Managing capacity requirements and developing capacity management process that initiates additional capacity for all video network components.
- Performing root cause analysis.
- Engineering of video application subsystems including EAS, Ad-insertion, VOD, IPG, Gaming.
- Reviewing video construction projects and their capital costs for validation of alignment with approved guidelines and the capital program
- Define IP VHO and IP SHE FiOS TV Architecture – Capacity Growth Project
- Manage IPTV Cross function team definitions and requirements gathering

**INTERGRATED PATH COMMUNICATIONS, LLC – CRARYVILLE, NY**

**Principal/ Director of Engineering/ Program Manager/Consultant**

**4/2006 to Present**

- Test Engineer – Provide verification of features and functions of Motorola digital CATV Headend equipment for Motorola DVS System Integration, which is a part of the DVS System Engineering organization at Horsham, PA.
- Prepare test plans/procedures from system requirements for Motorola DVS System Integration, which is a part of the DVS System Engineering organization at Horsham, PA.
- Create test reports and present results to engineering teams and Project management for Motorola DVS System Integration, which is a part of the DVS System Engineering organization at Horsham, PA.
- Monitor the project life cycle of multiple simultaneous projects within Comcast Cable National Engineering & Technical Operations
- Supported CMTS upgrade for supporting VOIP and Power Boost for Comcast Cable National Engineering & Technical Operations
- Supported CMTS Next Generation Project in support of VoIP for Comcast Cable National Engineering & Technical Operations
- Analyze and forecast capital requirements for Comcast Cable National Engineering & Technical Operations new products and services
- Develop spreadsheets, power point presentations, and formal documents describing capacity and budget requirement for Comcast Cable National Engineering & Technical Operations
- Designed and Implemented a Capacity Planning models for Comcast Cable National Engineering & Technical Operations CMTS Capacity management team
- Designed and Implemented a Capacity Planning models for Comcast Cable National Engineering & Technical Operations Digital Video Transport
- Designed and Implemented IPTV Network Architecture for deployment in Haiti TV Cable System
- Designed and Implemented PON Architecture for deployment in Haiti TV Cable System
- Provide Capacity Planning Modeling including forecasting budgets to Haiti TV Cable System
- Designed and Implemented Gig-E transport for Haiti TV Cable System
- Designed and Implemented VOD System for Haiti TV
- Project managed Haiti TV System Build and Launch

**CABLEVISION SYSTEMS CORP.**

**3/96 to 4/2006**

**TELECOMMUNICATION NETWORK MANAGEMENT – Bronx/Brooklyn, NY**

**8/01 to 4/2006**

**Area Manger Inside Plant Engineering Headend – NYC (Brooklyn/Bronx)**

- Manage two 860 MHz analog and two digital Headends and 11 hub sites which service more than 850K subscribers.
- Responsible for Headend FCC proof of performance (C/N, S/N, Differential Phase/ Differential Gain, Chrominance Luminance Gain, and Chrominance Luminance Delay) and budgeting
- Supported the rebuild effort by building 5 new Multi-Product Hub
- Designed and tested (C/N, CTB, and CSO) fiber interconnects (Super Trunk) to link headends in region via optical fiber.
- Supported CMTS upgrade for supporting VOIP

- Managed the implementation of operational impacting projects, operational and capital budgets. Responsible for the design and methods and procedures development/implementation.
- Managed staff development, and interdepartmental and vendor management.
- Designed and Implemented Gig-E transport which supported VOD (iP Video) for 11 Hub Sites and 2 Server Sites, C and L Band Satellite transport systems, and HDTV SONET Transport System
- Developed data security Anti-pirate counter measures
- Designed local System NOC for monitoring HSD, Broadcast Digital and VOD services
- Implemented and Managed ASI (iP Video) Transport systems
- Implemented Digital Commercial Insertion systems and Battery back-Up and Node status monitoring system
- Outlined all test and maintenance procedures for Broadcast Digital (ASI), VOD, HSD and DAVIC systems
- Responsible for managing a technical staff of 14 telecommunication engineers.
- Supported the budget management process by developing budget tracking tools using Java, Excel and MS Access

**NEW PRODUCT OPERATIONAL DEVELOPMENT – Bethpage, NY**

**1/00 to 8/01**

**Senior Project Manger**

- Responsible for managing and directing the implementation of operational impacting and growth of new business initiatives business critical projects within Telecommunication Services.
- Coordinate cross business unit resources to consistently deliver high quality products and services on-time and in budget.
- Actively involved in the overall project management for new product or special project initiatives involving senior business leaders.
- Manage all phases of projects (time, scope, budget, and risk) with strategic and/or tactical importance to Cablevision.
- Supported the budget process

**CORPORATE ENGINEERING – Woodbury, NY**

**3/98 to 1/00**

**Manager, Engineering & Design – Network Resources**

- Manage SONET (Interconnect Optical Network {ION}) spanning 3 states, including utilization for voice/data/IP & video (HDTV, compressed and un-compressed), surveillance/status monitoring, circuit/network design, OC48 hand-off, OC3 hand-off, and vendor/system analysis.
- Controlled management of contract deliverables, training, expansion of network, and budget responsibility.
- Designed and implemented NOC, including methods, procedures, and schedules.
- Supported the budget management process by developing budget tools using C++, and Excel

**OPERATIONAL ENGINEERING – Hicksville, NY**

**11/96 to 3/98**

**Supervisor – Headend/Hub**

- Responsible for supporting the forward and return HFC network, headend and hub plant for 670K subscriber system, including design development, methods and procedures development.
- In charge of first level management of 11 technical personnel, including training, schedules, reviews, and interviews.

Designed and tested (C/N, CTB, and CSO) fiber interconnects (Super Trunk) to link headends in region via optical fiber.

Designed and implemented Satellite Antenna installation and maintenance procedure. Perform due diligence inspections.

Responsible for Headend FCC proof of performance (C/N, S/N, Differential Phase/ Differential Gain, Chrominance Luminance Gain, and Chrominance Luminance Delay) and budgeting

**SNET PERSONAL VISION, INCORPORATED – New Haven, CT**  
*Manager System Design and Planning*

4/96 to 10/96

Responsible for developing the technical direction for the long-range business objectives of the Deployment of multimedia services within Connecticut

Providing complex designs in support of:

Systems Designed Transport

- SONET – Design for delivery of Data, NTSC Video and Digital video signal
- Headend – Design/Upgrade for channel expansion and digital capability
- Pay Per View – Analog tape base delivery, migrating to Digital interactive delivery
- Ad-Insertion – Digital state wide system capable of town by town insertion
- Public Access – Design facility interconnection via fiber optic transport technology

Vendor Evaluation

- Matrix Evaluation for Baseband video and BTSC audio
- Matrix Design for RF and IF video signals using multiple vendors
- Digital Video Server Evaluation for Multi-Application
- Ad-Insertion – Vendor Evaluation for Spot insertion and Info-Commercials
- Set Top Box Selection with interactive Electronic Programming Guide
- Character Generator with graphic display and remote communication
- Traffic and Billing solution
- Public Access facility processing equipment selection

Broadband CATV Distribution Systems

- Inter central office fiber optic network design with return path technology  
Incorporated
- Ad-Insertion – HFC network design. Inserting at Globally and Granularly points
- Public Access – fiber optic network transport design
- Control Operations Room Design for Status Monitoring

**Texscan MSI – Salt Lake City, Utah**  
**Project Manager, Senior Field Service Engineer**

3/93 to 4/96

- Responsible for all aspects of project development, implementation, and management.
- Supervised technical and operational staffs.

- Trained technicians and customers.
- Designed, and implemented installations and test procedures

**ALLEN ORGAN STUDIOS INCORPORATED – Albertson, NY**

**6/90 to 6/92**

*Service Manager*

- Responsible for training technicians, writing test procedures, scheduling service calls, trouble-shooting to component level (analog and Digital), designing installations

**MARCONI CIRCUIT TECHNOLOGY INCORPORATED – Farmingdale, NY**

**2/88 to 3/90**

**Calibration Technician A**

- Responsible for calibrating various test instruments, producing technical reports, evaluating operating systems

**RHG ELECTRONICS LAB INCORPORATED – Bayshore, NY**

**4/87 to 1/88**

*RF/Microwave Engineering Technician*

- Tested, tuned, and did troubleshooting of microwave attenuators, switches and performed all final testing including source inspections. Wrote specification sheets and outlines.

**GENERAL MICROWAVE CORPORATION – Amityville, NY**

**4/86 to 4/87**

*Microwave Technician*

**NARDA MICROWAVE CORPORATION – Hauppauge, NY**

**9/85 to 4/86**

*Microwave Technician A*

**EDUCATION/TRAINING**

State University of New York – Old Westbury, NY  
BS Computer Science Engineering – Graduation Summer 2006

Novell Certified Network Engineer Training Center  
Certified NetWare Administrator (CNA) – 7/1995

Grumman Data Systems Institute  
Electronic Technology Diploma - 1985



## **Anson Malcolm**

50 Chestnut Road ▪ Amityville, NY 11701  
T: 917-306-3025 ▪ malc8089@gmail.com

### **SENIOR ACCOUNTANT**

#### **PROFILE**

- Award winning, corporate accounting strategist and senior accountant with 10+ years of leadership experience in full cycle financial accounting, financial reporting and compliance control for small to medium size corporations
- Combines detailed-oriented analytical skills with perceptive big picture thinking capabilities to provide astute fiscal and operating advice for short and long term business planning
- Employs communication and relationship management skills to cultivate strong relationships at all levels
- Excels in high-pressure environments for large scale, high profile institutions, handling all responsibilities with utmost integrity, diligence and professionalism
- Builds and motivates high-performance accounting and finance teams
- Bachelor of Science Accounting and Associates degree in Applied Science Accounting - **(Honors)**
- Expert in US Taxation for individuals, partnerships and corporations
- Previous experience in a not-for-profit environment
- Computer literate in QuickBooks, Excel, Word, Outlook

#### **ACHIEVEMENTS/ACCOMPLISHMENTS**

- Instituted controls and processes to turnaround mismanagement of the main receivables account (\$250M) following an unsuccessful attempt by an external firm resulting in 5 figure losses
- Introduced daily account reconciliations procedures to manage the high volume of transactions and statements with increased accuracy and speed
- Reconciled accounts with utmost accuracy, investigating discrepancies to locate missing funds, averting financial losses through write-off procedures to force account balancing
- Slashed administrative processing times for bank reconciliation from 1 week to mere hours
- Selected by management to draft an internal moving expense policy for employees that was adopted by the university
- Developed an automated system for on-site and off-site archival records by creating a customized Excel database to incorporate all records, allow accessibility to internal users and increase search agility
- Received honorable mention in annual in-house newsletter citing stellar bank reconciliation efforts based on tuition account management, and the introduction of an archival records retention policy that has since been deemed the Facility's "Gold Standard"
- Recipient of the prestigious Administrative Outstanding Achievement Award (2008) base on valuable contributions throughout tenure
- Selected by the Chair of the Board of Trustees to concurrently hold the Controller position for St. John's Bread and Life, a subsidiary charity and the largest soup kitchen in New York.

## **ACCOUNTING/BOOKKEEPING CONSULTANT**

**2010 - Present**

- Maintain the accounting records for several small businesses in the New York and Connecticut area
- File quarterly sales tax returns, payroll tax returns and other year-end forms as required
- Prepare budget reports using Microsoft excel as a primary tool
- Converted small businesses accounting systems from manual to automated

## **SENIOR ACCOUNTANT 2001 – 2010**

*St. John's University New York*

- Oversaw the university's tuition receivable portfolio valued at over \$250M, allocated tuition revenue to the proper period and aged accounts receivables in order to enhance the monthly management reporting process
- Implemented the entire business affairs department records retention policy, allowing for easy access through a university wide database and reduced the cost of records retrieval
- Managed a \$740 Million fixed assets portfolio which consisted of capital assets including buildings, equipment, structural upgrades, vehicles and real property; maintained records in Excel to provide management with an additional tool for asset write-off
- Supervised the recording of capital assets at cost value and regularly updated depreciation schedules to accurately determine the correct residual value
- Implemented write-off procedures in order to facilitate decision making process regarding worthless assets were reflected on the financial statements
- Directed fiscal management policy and procedures, reviewed charitable contributions documentation for completeness and compliance
- Implemented strict internal control procedures to safeguard the assets of the organization
- Provided year-end audit schedules for external auditors and liaised with auditing firm to ensure utmost due diligence and transparency

## **ACCOUNTING MANAGER-REVENUE**

**1997 – 2001**

*St. John's University (formerly College of Insurance) New York*

- Oversaw 4 direct reports with responsibility for tuition revenue and auxiliary revenue which increased exponentially from 1997- 2000
- Overhauled accounts receivable procedures by implementing rigorous collections measures with tracking, constant billing and direct contact with outstanding accounts, reducing receivables by 25% in the first 3 months
- Aged accounts receivable, set-up allowance for doubtful debts and performed monthly variance analysis for management reporting purposes
- Recorded the acquisition of all fixed assets, depreciation methods used and the disposition of capital assets, accounting for all gains and losses

## **EDUCATION & PROFESSIONAL DEVELOPMENT**

**Bachelor of Science Accounting – (Honors) City University of New York, NY**

**Associate Degree in Applied Science Accounting - (Honors) New York City College of Technology, NY**

**Certificate in Hotel/Motel Front Office Management – New York Food & Hotel Management School, NY**

## Ruben M. De Los Santos

1438 SW Gilroy Rd.  
Port St. Lucie, Fl. 34953  
ruben@voipatlantic.com  
Phone: 954-778-6166

### VoIP Implementation Engineer - VoIP Project Manager - PGW C7/SS7 Engineer

- **VoIP Implementation Engineer** - Extensive experience in maintaining and supporting enterprise-wide voice network infrastructure, operations and applications.
- **VoIP Project Manager** - Excellent communications, team-building, and conflict management skills. Diplomatically resolved issues involving vendors (international telecom leaders), internal customers, and client companies.
- **PGW C7/SS7 Engineer** - Design, implement and provision Cisco PGW for C7/SS7 networks all over the world. Including challenging countries as Ecuador, Peru, Bolivia, Pakistan, New Zealand and Nigeria to name a few.

### Professional Experience

#### **VoIP Atlantic, Inc.** - Founder, Port St Lucie, Fl. 2005 - Present

Providing expertise in VoIP and networking, telecommunications and VoIP professional services, Cisco 2200 PGW services, networking deployment, troubleshooting, and related expertise to a wide variety of clients.

#### **Titan Communications** - CIO, Boca Raton, Fl. June 2008 - January 2009

Was brought in as a new team leader to incorporate VoIP into their existing TDM network. Designed VoIP infrastructure. Ordered Cisco voice gateways and DSP card to correspond with our design. Configured gateways to terminate to their existing DMS digital T1 switch. Incorporated security measures to protect network. Implemented SNMP monitoring services. Trained a team of seven on common Cisco monitoring commands, simple configuration changes as well as H323, SIP and dial peer understanding.

#### **VoiceInterop** - CIO, Boca Raton, Fl. December 2007 - June 2008

Designed and implemented PGW and Cisco AS5400 gateways in Kuwait for international proper and mobile termination into 96 E1s on their SS7 switch. Designed a full IP to IP network in their NAP collocation for passthrough traffic as well as a central location for radius billing. Trained existing team on Cisco basic commands and on the newly applied billing platform.

#### **webVoIP, Inc.** - Senior VoIP Engineer, Fort Lauderdale, Fl. September 2000 - March 2005

Implementation and management of Cisco VoIP Routing and Billing. TCL Script writing. PGW provisioning. Monitor day to day performance. Control appropriate work of VoIP, security systems. Implement network management and automate system troubleshooting. Configure install and maintain Internetworking devices. Analyze complex network problems and coordinate resolutions.

#### **WTC** - VoIP Implementation Manager, Fort Lauderdale, Fl. January 2000 - September 2000

Led the development, implementation and deployment of scalable and distributed web based billing and management system solution utilizing Internet, VoIP and traditional TDM voice circuit expertise.

#### **Quantum Int'l, LLC.** - Network Administrator, Pompano Beach, Fl. January 1997 - November 1999

Running and installation of Cat5 cables. Set up small networks, patch panels, hubs. Installation of Window 98 and/or Windows NT on work stations. Managed Linux servers. Monitored VoIP network. Handled trouble tickets.

#### • **VoIP Implementation Engineer.**

- VoIP Protocol - H323, SIP, MGCP
- LAN/WAN Technologies - Ethernet, X.25, VLAN, E1, T1, DS3
- Security - Access Lists, SSH, IPSEC, 3DES, RADIUS/TACACS
- Network Management - SNMP, DNS, BIND, SENDMAIL
- Implement Patches and Upgrades - Cisco IOS, VCWare, Boot Images
- Troubleshooting - Debugs, Traceroutes, Ethereal
- Radius - AAA, IVR (TCL Scripts)

#### • **Network Administrator**

- WAN - PPP, ISDN, Frame Relay, ATM, VPN
- Routing Protocols - RIP, OSPF, EIGRP, BGP
- VLANs - Trunking, ISL, VTP, Pruning
- PBX - Nortel
- Firewall - IP Tables, IP Access Lists Standard and Extended, PIX, IPsec

- **Hardware**

- Cisco 1600, 1700, 2500, 2600, 3600, 3700, 7000, 7200 and 7500 Series Routers
- Cisco AS5300, AS5350, AS5400, AS5400HPX Access Servers
- Cisco 26XXxm, 3660, 3725, 3745, 3825, 3845 and 7301 IP-to-IP VoIP gateways
- Cisco 1900, 2900, 3500, 4500, 5000, 5500, 6000 and 6500 Catalyst Series Switches
- Cisco PIX 506, 520 and 521 Series Firewall
- Cisco 802.11b Wireless Router

- **Software**

- Cisco PGW
- TCL Script Programming
- Cisco IOS Releases 11.x - 12.4, Cisco boot Images, Cisco VCWare, CiscoWorks, CME
- Windows 7, Windows Vista, Windows XP, Windows, 98/95, Windows 2000, Windows NT
- Mac OS 10.x
- Linux Red Hat, SuSe, CentOS, Debian,
- Visio

- **Technical Trainer - Wholesale/Prepaid Billing.**

- Conduct training programs for new and existing clients
- Develop and maintain scripts in order to make training tasks easier
- Contributor in cross organizational projects

- **Linux, UNIX and Windows servers.**

- Networking - TCP/IP, Telnet, FTP, TFTP, DNS, DHCP, NAT, ifconfig, route, netstat, xinetd
- Mail - SMTP, POP, IMAP, Sendmail
- Scripting Languages: TCL/Shell/Expect

## Projects

- **GlobalTel**

- TCL script for use on Cisco IP2IP gateway that would automate the purchasing of accounts for roaming calls that cannot be billed on large cellular providers. The script would allow to make credit card purchases, recharge, collect calls and/or speak to a customer service representative.

- **IronLink Communications, Inc.**

Cisco 7501 enterprise router was installed to accommodate the BellSouth DS3 added to provide additional and redundant bandwidth to their existing infrastructure. Utilizing BGP and EIGRP routing protocols and well as static routes. Supply security and management system.

- **Zingotel, Inc.**

Designed, assisted in the purchase and configured Cisco gateways (AS5400), catalyst switches (2924) and DigiPort Server to offer port termination and over 500 DID origination in four Canada locations; Montreal, Toronto, Vancouver and Calgary. Assist in purchase of PRIs and Colocation.

- **NDX Communications, Inc.**

Lead a team of engineers to design a network of three DS3 of domestic USA termination equating to over two dozen Cisco voice gateways in different locations around the US. This project was successfully implemented within the allocated time as was also the implementation and training of the routing and billing management software.

## Languages

- English - Speak, Read and Write Fluently
- Spanish - Speak, Read and Write Fluently

## Exhibit E

### Proposed Lifeline Rate Plans

Lifeline 250 Minutes	\$9.25
Tribal Lifeline 1,000 Minutes	\$34.25

**Additional Minutes:**

75 Anytime Additional Minutes	\$5.00
250 Anytime Additional Minutes	\$13.50
500 Anytime Additional Minutes	\$25.00
1000 Anytime Additional Minutes	\$30.00

Texting: 3 texts per ONE minute of voice.

All plans include Caller ID, Call Waiting, and Voicemail.

## Catherine Beard

---

**From:** Beth Salak  
**Sent:** Friday, November 04, 2016 2:39 PM  
**To:** 'bshepard@ipc-llc.com'; Greg Fogleman  
**Cc:** Catherine Beard; Mark Foster; Patrick Hardy  
**Subject:** RE: Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.

Mr. Shephard,

Thank you for your response to Mr. Fogleman's email.

Are you planning on submitting the updated Florida plan to the FPSC? If so, when do you think the update will be completed and will it have the specificity outlined in Mr. Fogleman's email below? It would be ideal for us if we could have it by November 14, 2016.

I appreciate you responding to the price list question. For clarification, the price plans are for any state you operate in including Florida? No states are mentioned so it is hard to discern where you offer the service plans. Are the price plans for wireline only? I want to reiterate my concern that the NON-Lifeline rates should be listed in a more conspicuous position on your webpage since not all customers will want Lifeline discounts and won't look under the Lifeline portion of the website.

I appreciate your response and I look forward to hearing from you.

Respectfully,

Beth Salak  
Director, Office of Telecommunications  
Florida Public Service Commission  
850-413-6408

---

**From:** [bshepard@ipc-llc.com](mailto:bshepard@ipc-llc.com) [<mailto:bshepard@ipc-llc.com>]  
**Sent:** Thursday, November 03, 2016 2:07 PM  
**To:** Greg Fogleman  
**Cc:** Beth Salak; Catherine Beard; Mark Foster; Patrick Hardy; Brian Shepard  
**Subject:** RE: Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.

Mr. Fogleman,

To address your question as outlined in your email to me:

Integrated Path Communications, LLC has a national five year plan which was submitted to the Texas PUC and approved by that Commission on May 19th, 2015 Docket No. 44519. This plan is being updated to include additional network deployments since its approval.

To address the additional question that you shared during our informal call yesterday:

Integrated Path Communications, LLC pricing is posted on its web page. The pricing listed on its web page illustrates both Lifeline and NON-Lifeline price plans.



Brian Shepard  
IPC, LLC/vuefone, LLC  
M - 518-325-1396  
F - 518-325-1397  
C - 212-380-7974  
web <http://www.ipc-llc.com>

web <http://vuefone.com>  
"Calling Never Looked So Good!"  
msn [brianeshepard@hotmail.com](mailto:brianeshepard@hotmail.com)

\*\*\*\*\*

This e-mail is intended only for the use of the addressees. Any copying, forwarding, printing or other use of this e-mail by persons other than the addressees is not authorized. This e-mail may contain information that is privileged, confidential and exempt from disclosure. If you are not the intended recipient, please notify us immediately by return e-mail (including the original message in your reply) and then delete and discard all copies of the e-mail. Thank you.

NOTICE: This communication contains information which may be proprietary, privileged or confidential. If you are not the intended recipient (or authorized to receive for the intended recipient), or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, disclose or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. Thank you.

----- Original Message -----

Subject: RE: Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.

From: Greg Fogleman <[GFoglema@PSC.STATE.FL.US](mailto:GFoglema@PSC.STATE.FL.US)>

Date: Tue, October 25, 2016 3:52 pm

To: "'[bshepard@ipc-llc.com](mailto:bshepard@ipc-llc.com)'" <[bshepard@ipc-llc.com](mailto:bshepard@ipc-llc.com)>

Cc: Beth Salak <[BSalak@PSC.STATE.FL.US](mailto:BSalak@PSC.STATE.FL.US)>, Catherine Beard <[CBeard@PSC.STATE.FL.US](mailto:CBeard@PSC.STATE.FL.US)>

Mr. Shepard

In support of your application before the Florida Public Service Commission, do you have a five-year plan that describes with specificity, proposed improvements or upgrades to your network throughout your proposed service area, including an estimate of the area and population that will be served as a result of such improvements?

Respectfully,

Greg Fogleman  
Public Utilities Supervisor  
Office of Telecommunications





## Catherine Beard

---

**From:** patrick@scinvestllc.com  
**Sent:** Friday, May 27, 2016 12:13 PM  
**To:** Catherine Beard  
**Subject:** Seminole Letter  
**Attachments:** IPC LETTER HEAD Seminal Tribe DRAFT.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Here is a copy of the letter sent back in April to the Seminole tribe.

Thanks,

patrick hardy

# INTEGRATED PATH COMMUNICATIONS LLC.

April 28<sup>th</sup>, 2016

Seminole Tribe of Florida  
6300 Stirling Road  
Hollywood Florida 33024

RE: Local Services Offering to the Seminole Tribe of Florida

Dear Seminole Tribe of Florida:

Integrated Path Communications, LLC (IPC) is a Competitive Local Exchange Carrier (CLEC) in the State of Florida. IPC provides local telecommunication services in the AT&T and Frontier service areas within the state of Florida..

IPC is petitioning the State of Florida Public Service Commission for designation as an Eligible Telecommunications Carrier (ETC) to be able to provide discount telecom service to low income individuals. If the application is approved, this ETC designation will allow IPC to provide free local telecommunication services to qualifying households which reside on the Seminole Tribal Lands.

Attached is a list of Integrated Path Communications, LLC rates for its local service.

Should you have any questions or concerns please contact Integrated Path Communications, LLC Customer Support at 888-224-6958.

Thank You.  
Brian Shepard