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August 2, 2017

VIA OVERNIGHT DELIVERY

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

**REDACTED**

RECEIVED-FPSC  
2017 AUG -3 PM 2: 06  
COMMISSION  
CLERK

Re: Docket No. 170146-TX; Responses to Data Requests  
**CONFIDENTIAL TREATMENT REQUESTED**

To Whom It May Concern:

Enclosed please find an original and two (2) copies of Global Connection Inc. of America d/b/a Stand Up Wireless' ("Company") responses to Data Requests issued in the above-referenced docket.

**The Company hereby requests confidential treatment of certain information identified herein (Responses to Nos. 21 and 29, and Exhibit D) pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. I have enclosed one (1) original copy and two (2) edited copies in which the information claimed as confidential is blacked out.**

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

Respectfully submitted,



Lance J.M. Steinhart  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
*Attorneys for Global Connection Inc. of America d/b/a  
STAND UP WIRELESS*

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM 2
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

Enclosures

**RESPONSES TO DATA REQUEST FOR GLOBAL CONNECTION INC. OF  
AMERICA D/B/A STAND UP WIRELESS**

1. Will Global Connection Inc. of America d/b/a Stand Up Wireless (Global) continue to provide wireline only Lifeline service in Florida?

**Response: The proposed transfer of control will not affect Global's provision of services. Global will continue to meet the requirements of its ETC designation, and at this time will continue to provide wireline only Lifeline service in Florida. Global does have an application pending with the FCC to transfer its existing wireline subscribers to Tele Circuit Network Corporation; however, Global still intends to utilize its ETC designation in Florida even after the proposed transfer.**

2. Does Global have any plans to offer wireless Lifeline services in Florida?

**Response: Global has an ETC application pending with the FCC for the authority to offer wireless Lifeline services in Florida.**

3. How many Lifeline customers does Global presently serve in Florida?

**Response: Global serves 95 wireline Lifeline customers in Florida as of June 31, 2017.**

4. How many of Global's Lifeline customers are paying via a prepaid service?

**Response: All of Global's Lifeline customers are paying via a prepaid service.**

5. Please provide examples of a Global residential bill as well as a Lifeline customer bill.

**Response: See attached Exhibit A.**

6. Is Global still providing wireline Lifeline service in all of the AT&T wire centers that were approved by this Commission?

**Response: Yes.**

7. Does Global have any outstanding Lifeline or other complaints at any state commission 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.

**Response: Global has a pending complaint with the NC state commission and the FCC. Global respectfully requests an extension of time to provide the requested documentation and will supplement this response as soon as possible.**

8. Please provide examples of Global's advertising which show the use of media of general distribution, the availability of the supported services and the charges for these services.

**Response: See attached Exhibit B.**

9. Are Global's Lifeline advertisements available in languages other than English? If so, which languages?

**Response: Global's Lifeline advertisements are also available in Spanish.**

10. Please list the states that Global currently operates in and the states Global provides Lifeline assistance.

**Response: Global currently provides prepaid wireline local exchange and long distance services in Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, Texas, and Wisconsin.**

**Global currently provides prepaid wireless telecommunications services under its d/b/a, Stand Up Wireless, in twenty-four (24) jurisdictions: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.**

**Global provides wireline Lifeline services in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and provides wireless Lifeline services in each of the 24 wireless jurisdictions listed above.**

11. In each of the states listed above, please indicate if Global is providing services as: 1) a wireline company or 2) a wireless company and whether it was designated by the state commission or the FCC.

**Response: Global, as a company, provides both wireline and wireless services. There are certain states in which Global provides both wireline and wireless services (see response to No. 10 above); however, Global's provision of wireless services is under its d/b/a StandUP Wireless. All of Global's telecommunications licenses to date, including ETC designations, have been granted by the state commissions.**

12. List all pending wireline eligible telecommunications carrier (ETC) petitions, with docket numbers and the state in which the designation is being requested.

**Response: Global does not have any pending wireline ETC petitions.**

13. List all pending ETC petitions, with docket numbers, currently pending at the FCC.

**Response: See *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia*, filed April 4, 2012, and subsequently amended on February 26, 2013, in WC Docket No. 09-197.**

14. Has Global filed for ETC status in any state and subsequently withdrawn the petition or been denied? If so, please list those states and docket numbers.

**Response: Global has not been denied ETC status in any jurisdiction. Global (d/b/a Stand Up Wireless) has withdrawn, without prejudice, its application for wireless ETC designation in the following states, in many cases due to FCC rule changes and passage of time which made the information stale: Idaho (GLO-T-13-01), Indiana (41052-ETC 71), Illinois (11-0579), Mississippi (13-UA-259), New Jersey (TO 11100621), Oregon (UM 1545) and Washington (UT-110992); Global has since refiled its wireless ETC applications in New Jersey and Washington. Global has withdrawn requests for wireline ETC designation in Illinois (07-0323 and 09-0586). It is possible that Global withdrew other wireline ETC applications in the past, prior to current management's knowledge; to the extent Global becomes aware of such withdrawals, Global will supplement this response as soon as possible.**

15. Are there states where Global is eligible, receiving, or seeking High-Cost support from the federal universal service fund (USF)? Please explain and list docket numbers where applicable.

**Response: No, Global has not requested and does not seek or receive high-cost support.**

16. With the new owner, has management or officers of Global changed? If no, do you anticipate such changes?

**Response: The proposed change in ownership is pending before the FCC and has not been consummated. David Skogen is no longer the CEO of Global; there have been no other changes in management or officers, and the only anticipated change would be an appointment to the CEO position.**

17. Have any owners, officers, or managers of Global been involved in any bankruptcy proceedings? If so, please provide details as to whom, when, and where the bankruptcy occurred.

**Response: No.**

18. Have any owners, officers, or managers of Global been charged or convicted of a criminal offense? If so, please provide details as to whom, when, and where the charges or convictions occurred.

**Response: No.**

19. Please identify any civil litigation in which a Global owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness.

**Response: None.**

20. Does Global use sub-contractors (operations, call centers, etc.) to provide the required services? If so, provide the name of each company and physical address.

**Response: Yes. Global outsources Call Centers to:**

**Vcare Corporation, based in NJ (1101 N. Kings Highway, Suite - 201, Cherry Hill, NJ 08034), and**

**Tele Circuit Network Corporation, based in GA (1815 Satellite Blvd., Suite 504, Duluth, Georgia 30097).**

21. Has Global been audited by any state or federal agencies regarding Lifeline? If so, list the state(s) and the result of the audit(s).

**Response:**

**USAC 2013 Biennial Audit for MO, GA and MI. No Findings.  
USAC 2015 Biennial Audit for GA, MI and WI. No Findings.**

**[BEGIN CONFIDENTIAL]**



**[END CONFIDENTIAL]**

22. For each state where Global is an ETC please identify how much support Global has received from the federal USF to date.

**Response: See attached Exhibit C, which includes data publicly-available on USAC's site.**

23. Does Global understand that there may be an audit by the Florida Public Service Commission regarding USF?

**Response: Yes.**

24. Does Global maintain separate books/general ledgers for each state that it operates in? Where are the books/general ledgers maintained?

**Response: Books/general ledgers are maintained at Global's principal office located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global does not maintain separate books or general ledgers for states.**

25. Please provide a listing of the current prices and service offerings available to Global Lifeline customers. Will the plans be changing with the new owner?

**Response: Global's wireline offerings are advertised on its wireline website, [http://www.connectwithglobal.com/home\\_services.html](http://www.connectwithglobal.com/home_services.html). Global does not currently provide wireless Lifeline services in Florida, but those plans are maintained at <https://www.standupwireless.com/>. Global's plans may change, irrespective of the new owner, due to changes in regulations and/or market competition.**

26. Has Global received requests for service from potential Lifeline customers that were unfulfilled in the previous calendar year? If so, how many?

**Response: To the best of Global's knowledge, Global did not have any unfulfilled service requests from qualified Lifeline customers in the previous calendar year.**

27. 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?

**Response: All customers, including Lifeline, are charged a reconnection fee. Customers are required to pay past due balances before reconnection. However, reconnection fees can be paid over time.**

28. Please provide the name of the person and/or entity which will be filing the Form 497 with USAC if Global maintains its ETC status in Florida.

**Response: The Form 497 will continue to be filed by CGM, LLC, in conjunction with Global's CFO (Edward Smith).**

29. Please provide a description of Global's corporate structure, with both names and titles. Please provide a list of Global's owners or corporate officers and indicate if any are also owners, corporate officers or employees of any other telecommunications companies.

**Response: See attached Exhibit D. A list of Global's current owners was provided in Exhibit A to the Joint Petition for Approval of Transfer of Control.**

**[BEGIN CONFIDENTIAL]**

**[END CONFIDENTIAL]**

Docket No. 20170145-TX  
Data Request

**EXHIBIT A**  
**SAMPLE BILLS**



**Global Connection Inc. of America**  
 P.O. BOX 1527  
 Norcross, GA 30091

# Invoice

Account No.	Invoice No.	Invoice Date	Due Date
[REDACTED]	3118811	06/16/17	06/30/17

**Total Amount Due** if paid by 06/30/17 **62.36**

Reconnection & Restoral fees apply  
 if service is disconnected or  
 suspended for non-payment.

Amount Paid

Check here to change address  
 and make changes in the space available below.



uid2299742—job783036  
 seq611—1of1



**Contact us to request a payment arrangement at 1-877-519-8557.**

Thank you for your most recent payment. We appreciate your business and value you as a customer. To prevent interruption of your home telephone service and potential loss of your phone number, please ensure we receive your payment on or before your Due Date shown above.

If you need to make payment arrangements or have questions concerning your account, please contact our Customer Care Center at 1-877-511-3009.

CUSTOMER SERVICE CONTACT INFO		
BY PHONE	BY EMAIL	BY MAIL
<b>CUSTOMER SERVICE HOURS</b> <b>1-877-511-3009</b> M-F 8:30am to 6:00 pm EST	<b>EMAIL SUPPORT</b> Email us at: <a href="mailto:support@RealHomePhone.com">support@RealHomePhone.com</a> to receive prompt and courteous response to your inquiry or issue.	<b>US MAIL</b> We may be reached at: Global Connection Inc. PO Box 1527 Norcross, GA 30091

PAYMENT OPTIONS		
Pay with your Visa or Mastercard credit or debit card Online: <a href="http://www.RealHomePhone.com">www.RealHomePhone.com</a> Call: 1-877-511-3009		
<b>SAVE \$2</b> WHEN YOU ENROLL IN AUTOPAY <small>with your Visa or Mastercard credit / debit card</small>		
<b>MoneyGram</b> MoneyGram: Pay at any MoneyGram location using receive code 3869	<b>WESTERN UNION</b> Western Union: Pay at any Western Union location including Kroger and BLD	<b>ACE CASH EXPRESS</b> ACE Cash Express: Pay at any ACE Cash Express location.
<small>Check or Money Order: Make payable to Global Connection. Include account number, drivers license and date of birth. Mail to: Global Connection, PO Box from envelope</small>		

**1800Free411**  
 NEVER PAY FOR INFORMATION CALLS  
 Global charges an extra fee for every call to 411. Don't pay for information. Dial 1-800-FREE411 from your home phone to avoid being charged for the call.

**REFER A FRIEND or FAMILY MEMBER**

FOR EACH REFERRAL  
 WE WILL GIVE YOU **\$10 OFF** YOUR BILL

Call Global Connection Customer Service for details

### Account Summary

Account Number	[REDACTED]
Telephone Number	[REDACTED]
Customer Name	[REDACTED]
Invoice Date	06/16/17
Invoice No.	3118811
Due Date	06/30/17

### Activity Summary

Previous Balance	62.36
Payments Received - Thank you!	-62.36
Balance Forward	0.00
New Charges	
Recurring Charges	43.45
Taxes and Surcharges	18.91
Total New Charges	62.36
<b>Total Due</b>	<b>62.36</b>

### Payments and Credits

Payment Received, Thank you!	5/31/17	-62.36	-62.36
<b>Subtotal</b>		<b>-62.36</b>	<b>-62.36</b>

### Recurring Charges

#### Recurring Charges for: Number: [REDACTED]

Description	Period	Amount
Advantage - 3140 - D	7/06/17 to 8/05/17	38.45
Call Waiting	7/06/17 to 8/05/17	0.00
Caller ID	7/06/17 to 8/05/17	0.00
Long Distance Provision Item - 100 Mins (1+)	7/06/17 to 8/05/17	0.00
Upgrade to 250 Minute LD (1+)	7/06/17 to 8/05/17	5.00
<b>Subtotal</b>		<b>43.45</b>

### Taxes and Surcharges

Federal Excise Tax	1.30
Federal Universal Service Fund	1.73
FL 911 Surcharge	0.40
FL Communications Services Tax	1.15
FL Telecom Relay System Fund	0.11
Local Communications Svc. Tax	2.77
Network Recovery Fee	4.95
Subscriber Line Charge	6.50
<b>Total Taxes and Surcharges</b>	<b>18.91</b>



**Global Connection Inc. of America**  
 P.O. BOX 1527  
 Norcross, GA 30091

# Invoice

Account No.	Invoice No.	Invoice Date	Due Date
[REDACTED]	[REDACTED]	06/29/17	07/13/17

**Total Amount Due** if paid by 07/13/17 **35.15**

Reconnection & Restoral fees apply  
 if service is disconnected or  
 suspended for non-payment.

Amount Paid

Check here to change address  
 and make changes in the space available below.



Contact us to request a payment arrangement at 1-877-519-8557.

Thank you for your most recent payment. We appreciate your business and value you as a customer. To prevent interruption of your home telephone service and potential loss of your phone number, please ensure we receive your payment on or before your Due Date shown above.

If you need to make payment arrangements or have questions concerning your account, please contact our Customer Care Center at 1-877-511-3009.

CUSTOMER SERVICE CONTACT INFO		
BY PHONE	BY EMAIL	BY MAIL
<b>CUSTOMER SERVICE HOURS</b> <b>1-877-511-3009</b> M-F 8:30am to 6:00 pm EST	<b>EMAIL SUPPORT</b> Email us at: <a href="mailto:support@RealHomePhone.com">support@RealHomePhone.com</a> to receive prompt and courteous response to your inquiry or issue.	<b>US MAIL</b> We may be reached at: Global Connection Inc. PO Box 1527 Norcross, GA 30091

PAYMENT OPTIONS		
Pay with your Visa or Mastercard credit or debit card Online: <a href="http://www.RealHomePhone.com">www.RealHomePhone.com</a> Call: 1-877-511-3009		
 MoneyGram: Pay at any MoneyGram location using receive code: 3369	 Western Union: Pay at any Western Union location including Kroger and BLD	 ACE Cash Express: Pay at any ACE Cash Express location.
<small>Check or Money Order: Make payable to Global Connection. Include account number, drivers license and date of birth. Mail to: Global Connection, PO Box from envelope</small>		

**1800FREE411**  
 NEVER PAY FOR INFORMATION CALLS

Global charges an extra fee for every call to 411. Don't pay for information. Dial 1-800-FREE411 from your home phone to avoid being charged for the call.

REFER A FRIEND or FAMILY MEMBER

WE WILL GIVE YOU **\$10 OFF** YOUR BILL

Call Global Connection Customer Service for details

## Account Summary

Account Number	[REDACTED]
Telephone Number	[REDACTED]
Customer Name	[REDACTED]
Invoice Date	06/29/17
Invoice No.	[REDACTED]
Due Date	07/13/17

## Activity Summary

Previous Balance	35.15
Payments Received - Thank you!	-35.15
Balance Forward	0.00
New Charges	
Recurring Charges	38.45
Taxes and Surcharges	14.45
Discounts	-15.75
Adjustments	-2.00
Total New Charges	35.15
<b>Total Due</b>	<b>35.15</b>

Your automatic payment will process on 7/13/2017  
 Please do not mail a payment.

## Payments and Credits

Payment Received, Thank you!	6/13/17	-35.15	-35.15
<b>Subtotal</b>		<b>-35.15</b>	<b>-35.15</b>
Auto Pay Credit	6/29/17	-2.00	-2.00
Credit - Lifeline Credit (USAC)	7/19/17	-9.25	-9.25
Credit - Lifeline Credit (Global)	7/19/17	-3.50	-3.50
Credit - \$3 off indefinitely	7/19/17	-3.00	-3.00
<b>Subtotal</b>		<b>-17.75</b>	<b>-17.75</b>

## Recurring Charges

Recurring Charges for: Number: [REDACTED]		
Description	Period	Amount
Advantage Lifeline - 3423 - AB	7/19/17 to 8/18/17	38.45
Call Waiting	7/19/17 to 8/18/17	0.00
Caller ID	7/19/17 to 8/18/17	0.00
Long Distance Provision Item - 100 Mins (1+)	7/19/17 to 8/18/17	0.00
<b>Subtotal</b>		<b>38.45</b>

## Taxes and Surcharges

Federal Excise Tax	0.85
FL 911 Surcharge	0.40
FL Communications Services Tax	0.73
FL Telecom Relay System Fund	0.11
Local Communications Svc. Tax	0.91
Network Recovery Fee	4.95
Subscriber Line Charge	6.50

Customer Name

[Redacted]

Account No.

[Redacted]

Invoice Date

06/29/17

Page No.

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Total Taxes and Surcharges

14.45



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Data Request

**EXHIBIT B**

**SAMPLE AD**





**EXHIBIT C**

**USF SUPPORT BY STATE**

AL	1,633,653
AR	3,844,366
AZ	10,944,433
CA	345,007
CO	187,756
FL	51,975
GA	6,309,612
IA	869,989
KS	295
KY	149,563
LA	10,036,398
MA	1,429,954
MD	9,955,841
MI	9,422,461
MN	20,172
MO	5,166,421
MS	66,407
NC	705,226
NE	180,255
OH	599,756
PA	6,528,301
PR	94,184
RI	33,717
SC	784,173
TN	28,731
TX	1,916,701
UT	28,153
WI	815,591
WV	574,160

Docket No. 20170145-TX  
Data Request

**EXHIBIT D**

**CORPORATE ORGANIZATION CHART**

**PUBLIC VERSION  
(CONFIDENTIAL IN ENTIRETY)**

## APPLICANT CERTIFICATION

State of **Georgia**  
County of **Gwinnett**

My name is Edward Smith, I am employed by **Global Connection Inc. of America d/b/a Stand Up Wireless**, located at **5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093** as its Chief Financial Officer. 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 (Florida PSC).

Company hereby certifies the following:

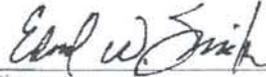
1. Company will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers (ETC), and the Florida Lifeline Program.
2. Company will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications 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. A company that only seeks designation for the Lifeline program that does not meet the facilities requirement, certifies that it has received forbearance from the FCC.
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.

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Data Request

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 Industry Development and Market Analysis  
2540 Shumard Oak Drive  
Tallahassee, Florida 32399-0850

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

8/1/17

Date

Edward Smith  
Printed Name

Business Address:

5555 Oakbrook Parkway  
Suite 620  
Norcross, Georgia 30093