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August 16, 2018

VIA FEDERAL EXPRESS

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

REDACTED

Re: 2018 Annual Lifeline Report Data Request (Global Connection Inc. of America)
CONFIDENTIAL TREATMENT REQUESTED

To Whom It May Concern:

Global Connection Inc. of America (herein "Global") hereby files an original and two (2) redacted copies of its responses to the 2018 Annual Lifeline Data Request.

Global hereby requests confidential treatment of certain information identified in Exhibits A and B pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. A confidential copy of the responses is attached hereto in a separate, sealed envelope.

If you have any questions or need additional information, please do not hesitate to contact me at 770-232-7805 or etc@telecomcounsel.com. Thank you for your attention to this matter.

Sincerely,



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

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COMMISSION
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CLEC AND WIRELESS LIFELINE DATA REQUEST 2018

To assist the Florida Public Service Commission in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by August 16, 2018. Your response should include your company name, contact person, and email address.**

RESPONSES OF GLOBAL CONNECTION INC. OF AMERICA
Contact: Jennifer Carter, Chief Compliance Officer
Email: compliance@standupwireless.com

For items 1 through 16, please provide the data for the fiscal year July 1, 2017, through June 30, 2018.

For those items requesting the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

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

Response: See CONFIDENTIAL Exhibit A.

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

Response: See CONFIDENTIAL Exhibit A.

3. The amount of Lifeline credit per line provided to Lifeline customers on their monthly bill.

Response: \$9.25 federal Lifeline subsidy per customer per month, plus a \$3.50 Company provided credit.

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

Response: See CONFIDENTIAL Exhibit A.

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

Response: See CONFIDENTIAL Exhibit A.

6. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

Response: See CONFIDENTIAL Exhibit A.

7. In accordance with Section 364.105, Florida Statutes, are you offering Transitional Lifeline service? If yes, what is the number of customers participating per month and what are your advertising efforts for Transitional Lifeline service?

Response: Global Connection offers Transitional Lifeline service to former Lifeline customers upon their request, with 0 customers participating. Global Connection does not have advertising efforts specific to Transitional Lifeline service.

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

Response: See CONFIDENTIAL Exhibit A.

9. Describe the amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.

Response: Applications received for wireline subscribers are typically and ordinarily processed with wireline services becoming active and initiated within one to five business days after application completeness and eligibility verification. Wireline services become active upon complete processing and the customer immediately receives the Lifeline credit upon initiation of service.

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

- a. Internal procedures for promoting Lifeline.
- b. Outreach and educational efforts involving participation in community events.
- c. Outreach and educational efforts involving mass media (newspaper, radio, television).
- d. Copies of Lifeline outreach materials of your company.
- e. Any links on your company Web site that provides Lifeline information.
- f. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Response: See CONFIDENTIAL Exhibit B.

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

Response: Yes. See CONFIDENTIAL Exhibit A.

12. To the extent you have experienced a decline in Lifeline customers since last year, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting Lifeline participation in Florida are welcome.

Response: Customer declines due to competitive pricing continue to occur due to the fact that Global Connection Inc. of America is a reseller of ATT local and long distance customers. As price increases continue to occur, these costs are partially passed along to the end-user, which ultimately results in customer loss.

13. Is your company currently providing Lifeline in any of the first six States that have transitioned to the National Verifier? If yes, please identify any issues you have experienced utilizing the National Verifier.

Response: The Company has not been able to utilize the soft phase of the National Verifier at this time. The National Verifier did not provide the ability for ETC's to test the process, and the National Verifier did not provide an Application Programming Interface (API) to permit real-time exchange of information with the Company. Without the ability to test the National Verifier, the Company cannot provide appropriate training guidelines to our team.

14. Did your company elect to participate in USAC recertification of Lifeline consumers for 2018?

Response: No.

15. If you elected USAC recertification, are you aware that in order to elect for 2019 recertification you must fill out the forms on USAC's website between July 16, 2018 and August 31, 2018?

Response: N/A.

16. Have you switched to using the new National Lifeline Application/Recertification forms in Florida?

Response: Yes, we are utilizing the FCC-approved forms.

17. The Lifeline Modernization Order of 2016 requires ETC's to offer Broadband Internet Access Services. To the extent that you are not offering Broadband Internet Access Services, have you submitted a forbearance notification to the FCC? If yes, please provide the date of your submission.

Response: The Company filed a forbearance notice for its wireline Lifeline service in WC Docket No. 11-42 on December 1, 2016.

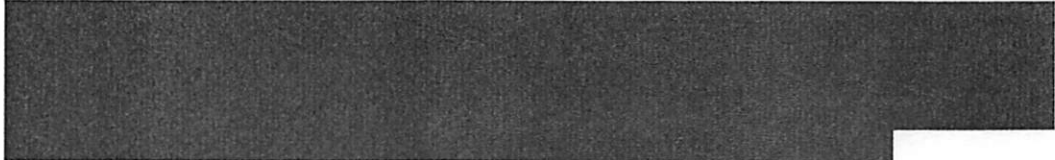



EXHIBIT A

PUBLIC VERSION

		2017					
		7	8	9	10	11	12
1	Total residential access lines in service						
2	Total End of Period Lifeline customers	20	6	3	3	5	1
4	Customers denied Lifeline service in month						
5	New Lifeline customers enrolled in month						
6	Lifeline customers de-enrolled in month						
7	Transitional Lifeline Participants						
8	Tribal Lifeline customers	-	-	-	-	-	-
15	Resale Lifeline lines:						
	AT&T						
	Century						
	Verizon						
	Windstream						

		2018					
		1	2	3	4	5	6
1	Total residential access lines in service						
2	Total End of Period Lifeline customers	4	4	6	5	7	7
4	Customers denied Lifeline service in month						
5	New Lifeline customers enrolled in month						
6	Lifeline customers de-enrolled in month						
7	Transitional Lifeline Participants						
8	Tribal Lifeline customers	-	-	-	-	-	-
15	Resale Lifeline lines:						
	AT&T						
	Century						
	Verizon						
	Windstream						

EXHIBIT B
PUBLIC VERSION

- a. 
- b. 
- c. 
- d. Please find attached copies of Lifeline outreach materials for our Company.
- e. 

Real
**HOME
PHONE
SERVICE**
www.RealHomePhone.com
Service provided by Global Connection Inc. of America



**SAY HELLO TO
REAL HOME PHONE
BIG SAVINGS**

CALL US TODAY: 1-877-511-3009

Lifeline is a government assistance program. Your Lifeline Benefit is non-transferable. Proof of eligibility is required and only eligible customers may enroll. Only one Lifeline discount per household. Global Connection Inc. of America.
Visit www.RealHomePhone.com for complete terms & conditions

SEE
STORE AGENT
TO
SIGN UP NOW!

SAY HELLO TO REAL HOME PHONE BIG \$SAVINGS\$

If you receive Government supported services,
you may be eligible for a Lifeline Discount on your home telephone service.

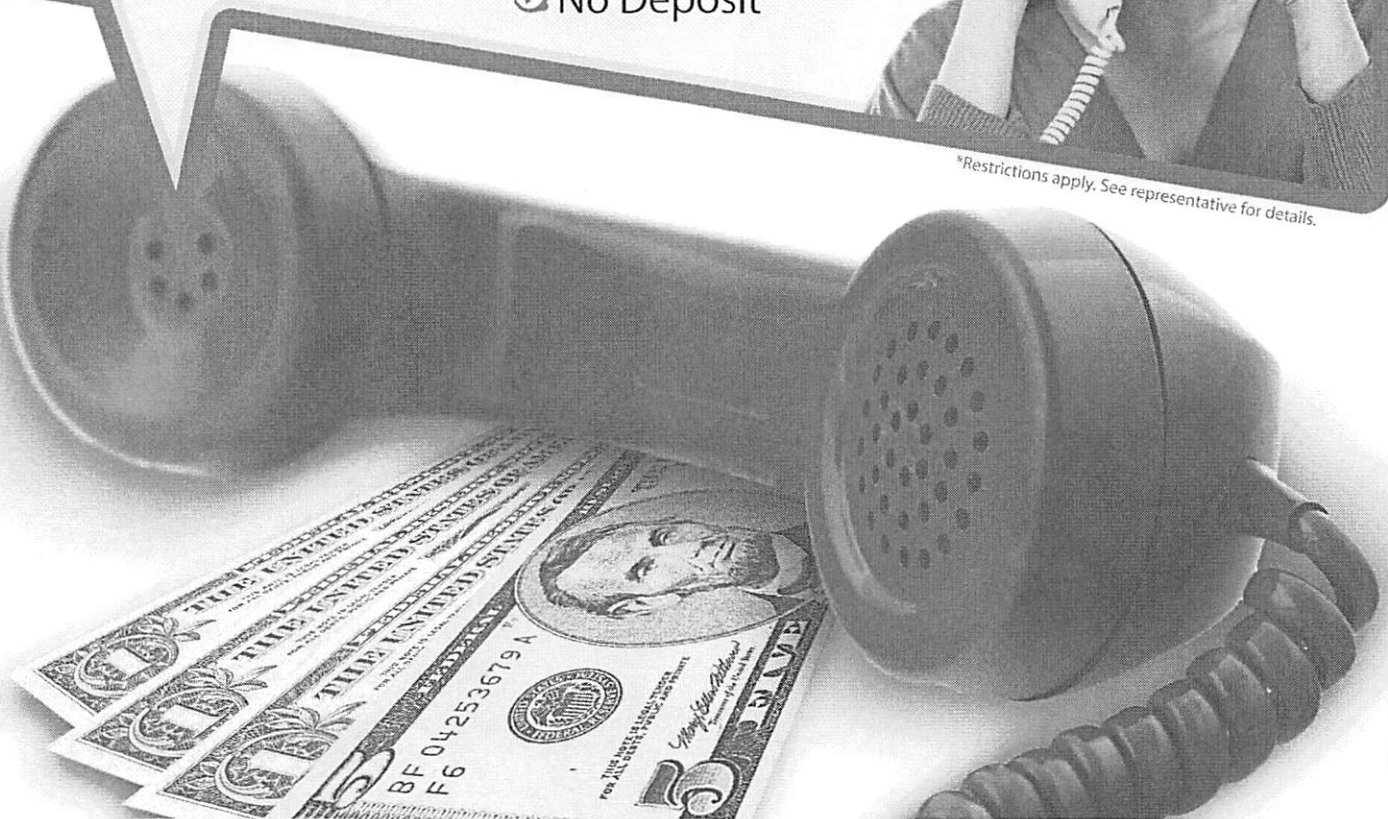
We proudly accept Global Connection
Real Home Phone Service payments

1-877-511-3009
hablamos español

- ✓ Unlimited Local Calls
- ✓ Great Plans
- ✓ No Credit Check
- ✓ No Contract
- ✓ No Deposit



*Restrictions apply. See representative for details.



Customers may contact their State Public Service or
Public Utility Commission with any unresolved
questions or complaints concerning Lifeline services:

Colorado Public
Utilities Commission
Consumer Affairs at
303-894-2070 or
800-456-0858

Georgia Public Service
Commission's Consumer
Affairs Unit at
404-656-4501 or
1-800-282-5813

Kansas Commission's
Office of Public Affairs and
Consumer Protection at
785-271-3140 or
800-662-0027

Massachusetts Consumer
Division Dept. of Telecommu-
nications & Cable 617-305-3531 or
800-392-6066

IMPORTANT LIFELINE WIRELINE SERVICE INFORMATION:

Lifeline is a government assistance program. Only one Lifeline service is available per household. A violation of the one-per-household limitation constitutes a violation of the Federal Communication Commission's rules and will result in your de-enrollment from the program. Your household is not permitted to receive multiple Lifeline benefits whether they be from one or multiple companies. This includes wireline and wireless services. Lifeline is a non-transferable benefit. You may not transfer your benefit to any other person. You must activate your service. Lifeline is a Federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Proof of eligibility is required and only eligible customers may enroll. Proof may consist of eligible program card or statement of benefits.

LIFELINE ELIGIBILITY CRITERIA

You may qualify if you participate in any of the following programs:

- Supplemental Nutrition Assistance Program (SNAP)
- Food Stamp
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Medicaid
- Federal Veterans and Survivor Pension Benefit

Please check your eligibility on the list below

You may qualify if you:

- Income is at or below 135% of Federal Poverty Guidelines (except for MI and CA)
- Income is at or below 150% of Federal Poverty Guidelines (CA and MI only)

You may qualify if you participate in the following programs:

- Temporary Assistance for Needy Families (TANF) (MI and CA only)
- Low Income Heat and Energy Assistance (LIEAP) (MI and CA only)
- National Free School Lunch Program (CA and MI Only)

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Service provided by Global Connection Inc. of America

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