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August 17, 2018

**VIA FEDERAL EXPRESS**

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

**REDACTED**

RECEIVED-FPSC  
2018 AUG 20 PM 2:37  
COMMISSION  
CLERK

Re: 2018 Annual Lifeline Data Request (i-wireless, LLC)  
**CONFIDENTIAL TREATMENT REQUESTED**

To Whom It May Concern:

i-wireless, LLC ("i-wireless") hereby files an original and two (2) redacted copies of its responses to the 2018 Annual Lifeline Data Request.

**i-wireless 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.**

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid 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 i-wireless, LLC*

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
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GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

**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 i-wireless, LLC  
Contact: Sam Bailey, Director of Compliance  
Email: sam.bailey@iwirelesshome.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.**

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: i-wireless offers Transitional Lifeline service to former Lifeline customers upon their request, with 0 customers participating. i-wireless 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: All applications for in-person distribution are reviewed in real-time by the Review Team. All applications taken online or received by mail are reviewed within 24 hours by the Review Team. A customer's Lifeline benefit will automatically be credited to their account upon successful activation and use of the handset.**

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: No, i-wireless did not provide Lifeline services using resale Lifeline lines obtained from an underlying carrier.**

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: i-wireless has seen a continued decline in Florida subscribers since December of 2016 – primarily due to an intentional slowdown in acquisition of new customers. With the implementation of the FCC’s 2016 Lifeline Modernization Order (FCC 16-38), it is becoming increasingly difficult to profitably acquire Lifeline subscribers in a \$9.25 (subsidy) state.**

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: Yes, i-wireless is currently providing Lifeline in some of the first six states that have transitioned to the National Verifier. The National Verifier currently does not have an API which has made it difficult to process enrollments in these states.**

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

**Response: No, i-wireless did not elect to participate in USAC recertification of Lifeline consumers for 2018.**

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: i-wireless did not elect USAC recertification for 2018.**

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

**Response: Yes, i-wireless switched to using the FCC Universal Forms in Florida beginning July 1, 2018.**

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: i-wireless does offer Broadband Internet Access Services and has done so since it became a supported service.**

**EXHIBIT A**  
**PUBLIC VERSION**



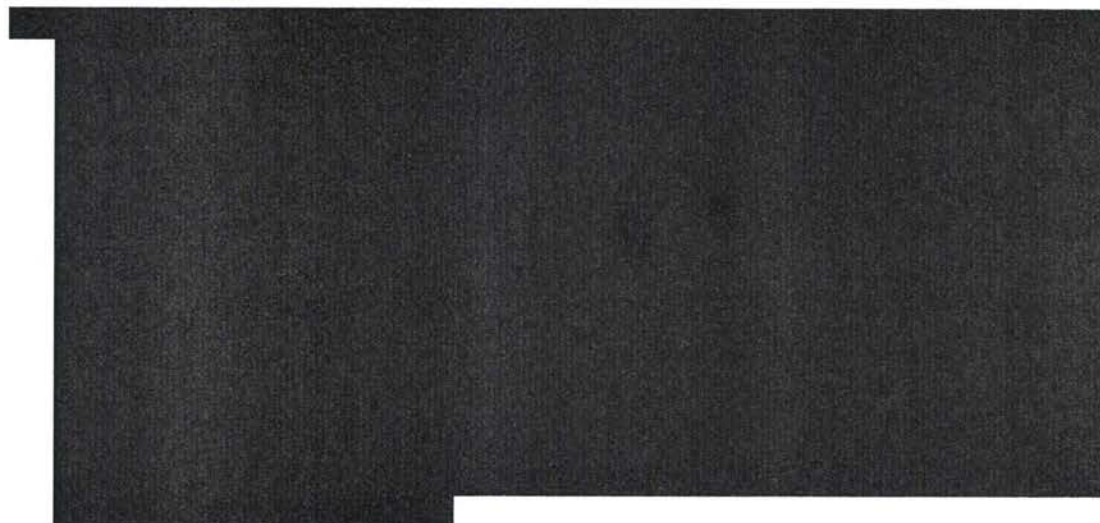
	Total residential access lines in service	Total End of Period Lifeline customers	New Lifeline customers enrolled	Lifeline customers de-enrolled	Transitional Lifeline Participants	Tribal Lifeline customers
7 2017		80,587				0
8 2017		73,109				0
9 2017		71,444				0
10 2017		71,088				0
11 2017		69,187				0
12 2017		68,817				0
1 2018		66,146				0
2 2018		63,110				0
3 2018		59,717				0
4 2018		39,708				0
5 2018		34,834				0
6 2018		31,874			0	0

Number of customers denied Lifeline service, by category

	NLAD Failures, Invalid Address, Name/DOB Mismatch
7 2017	
8 2017	
9 2017	
10 2017	
11 2017	
12 2017	
1 2018	
2 2018	
3 2018	
4 2018	
5 2018	
6 2018	

**EXHIBIT B**

**PUBLIC VERSION**



d. Copies of sample Access Wireless outreach materials are attached for reference.

e. [www.accesswireless.com/lifeline](http://www.accesswireless.com/lifeline)



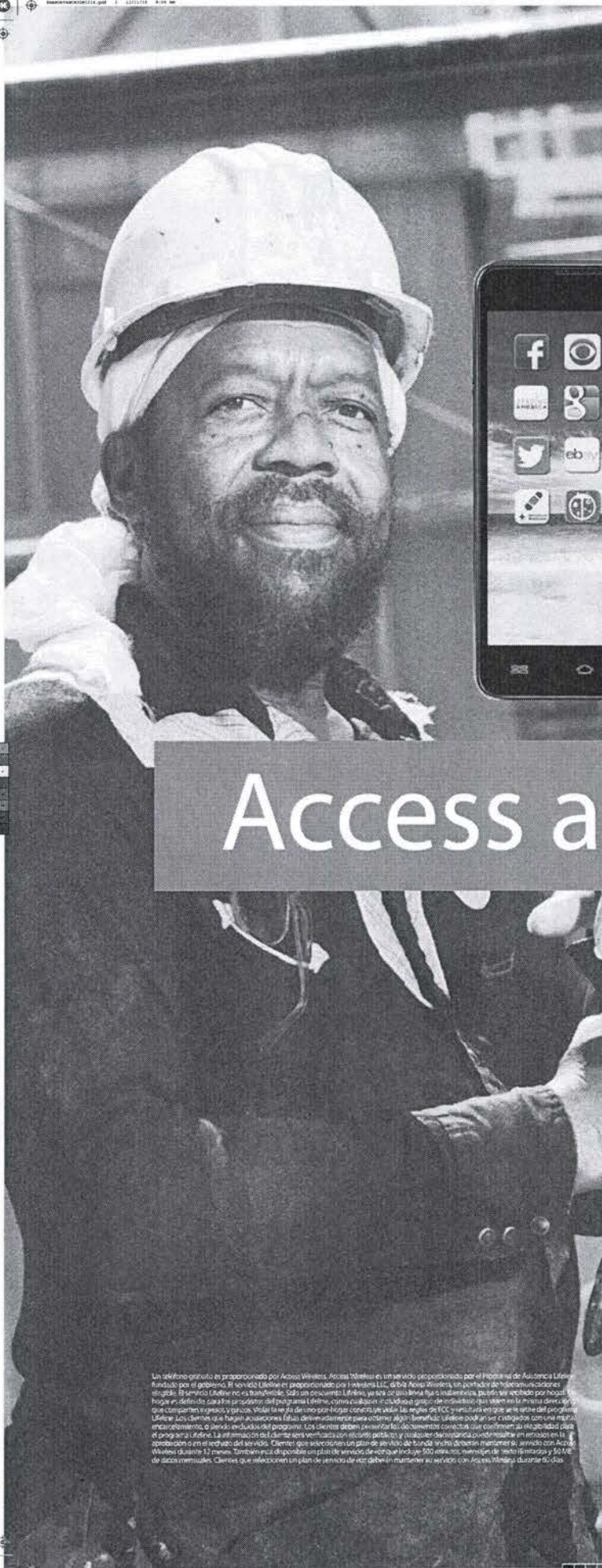












# Teléfono Gratis

+500 MB de Datos\*  
Textos Ilimitados  
750 Minutos

\* Datos de alta velocidad 3G.



## Access a trabajos.

Usted puede calificar para la Asistencia Lifeline que proporciona Access Wireless® si usted participa en programas de asistencia pública como SNAP/Cupones de Alimentos, Medicaid o el Seguro de Ingreso Suplementario.

**Llamada**  
1-888-450-1838

[www.accesswireless.com](http://www.accesswireless.com)



A government-funded Lifeline Assistance Program

Un teléfono gratuito es proporcionado por Access Wireless. Acceso Wireless es un servicio proporcionado por el Programa de Asistencia Lifeline financiado por el gobierno. El servicio Lifeline es proporcionado por Access Wireless LLC, a la Access Wireless, un portador de telecomunicaciones regulado. El servicio Lifeline no es transferible. Solo un documento Lifeline por casa línea fija o inalámbrica, por otro, se requiere por hogar. El pago es deducible para los participantes del programa Lifeline como el básico o cualquier grupo de subsidios que determine la misma dirección y que compartan un espacio y acceso. Vístase la verificación de uso por hogar conectada al sistema de FCC y verifique que se le otorgue el programa Lifeline. Los clientes que a hacen acusaciones falsas deliberadamente para obtener algún beneficio Lifeline podrán ser castigados con una multa, un reembolso de dinero o la exclusión del programa. Los clientes deben presentar los documentos correctos que confirmen su elegibilidad para el programa Lifeline. La información del cliente será verificada con récords públicos, y cualquier discrepancia puede resultar en servicios en la suspensión o en el rechazo del servicio. Clientes que seleccionen un plan de servicio de fondo finito deben mantener su servicio con Access Wireless durante 12 meses. También es disponible un plan de servicio de fondo finito de 30 minutos mensuales de mantenimiento y 30 minutos de datos mensuales. Clientes que seleccionen un plan de servicio de voz deben mantener su servicio con Access Wireless durante 90 días.





# Free Smartphone

Two Rate Plans to Choose From:

<b>250 Minutes</b>		<b>750 Minutes</b>
<b>Unlimited Text</b>	<b>OR</b>	<b>Unlimited Text</b>
<b>1 GB of Data</b>		<b>50 MB of Data</b>

You may qualify for Lifeline Assistance provided by Access Wireless® if you participate in public assistance programs such as SNAP/Food Stamps Medicaid or Supplemental Security Income.

To apply, visit [www.accesswireless.com](http://www.accesswireless.com)

  
access  
**WIRELESS**®

A government-funded Lifeline Assistance Program.



## Need More Airtime?



Redeem an Access Wireless or i-wireless PIN or use a debit or credit card to purchase data.

	<b>\$10</b>	500 Minutes, Unlimited Text & 500 MB of Data for 30 days <i>Electronic PIN; at select locations</i>
	<b>\$25</b>	Unlimited Minutes, Unlimited Text & 1 GB of Data for 30 days
	<b>\$35</b>	Unlimited Minutes, Unlimited Text & 2.5 GB of Data for 30 days
	<b>\$50</b>	Unlimited Minutes, Unlimited Text & 4 GB of Data for 30 days
	<b>\$5</b>	250 Minutes, Unlimited Text & 250 MB of Data for 30 days <i>Electronic PIN; at select locations</i>

## Earn Free Wireless Rewards



You can earn FREE Wireless Rewards in the checkout line when you shop at participating Kroger-owned stores and use your Shopper's or Rewards Card. For every 100 points you earn, you'll receive a FREE Wireless Reward.\*\*



Call 611 from your Access Wireless phone to register.

Unlimited does not mean unreasonable. If you subscribe to rate plans, services or features that are described as unlimited, you should be aware that such "unlimited" plans are subject to the Prohibitive Network Uses policy. Subscribers in approved Lifeline status will receive a monthly Lifeline credit applied on the same date each month. The account will reset each month when the monthly Lifeline credit is applied. Any unused minutes or data from the monthly Lifeline credit will not carry over to the next month. Minutes, texts or data added as a result of a top-up payment will be used after the monthly Lifeline credit has been exhausted. Any unused minutes, texts or data will last for 30 days from the date that the funds were applied to the account. Subscribers must be registered for the Wireless Rewards program in order to be eligible to receive Wireless Rewards on qualifying purchases at participating Kroger family store locations. Wireless Rewards will be applied in increments of 20 voice minutes or 20 megabytes of data as determined by rate plan type, for every 100 points earned in-store on qualifying purchases. Any unused Wireless Rewards will carry over each month until the voice minute (2,000) cap or data cap (5 GB) is met. Some restrictions apply. For details on the Wireless Rewards program, visit [www.accesswireless.com/rewards](http://www.accesswireless.com/rewards). Subscribers in a non-approved Lifeline status will be moved to the Access Basic plan. Any unused minutes or data from the monthly Lifeline credit will be lost. Minutes, texts or data added as a result of a top-up payment or earned Wireless Reward will automatically carry over for 30 days from the date of status change.

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless, LLC, d/b/a Access Wireless, which is an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount, consisting of either wireline or wireless, or broadband internet access service, may be received per household. Violation of the one-per-household rule constitutes a violation of the FCC's rules and will result in the customer's de-enrollment from Lifeline and potentially prosecution from the United States government. Only eligible customers may enroll in the program. Consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. Customers must present proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records, and any discrepancies could result in delays in your approval or rejection of service. Free phone is provided by Access Wireless in accordance with its Handset Policy. Phone model may vary based on inventory availability and is at the discretion of i-wireless LLC. Access Wireless network services are provided on the Nationwide Sprint Network. Sprint is a trademark of Sprint Nextel. Android is a trademark of Google Inc.

\*\* FREE Wireless Rewards are earned on qualifying purchases only. SNAP/Food Stamp purchases may be eligible for loyalty rewards program. Access Wireless users must be registered for the FREE Wireless Rewards program in order to receive rewards. Some restrictions apply. For details on the FREE Wireless Rewards program, visit [www.accesswireless.com/rewards](http://www.accesswireless.com/rewards).