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August 27, 2020

**VIA FEDERAL EXPRESS**

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

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RECEIVED-FPSC  
2020 AUG 28 PM 12:54  
COMMUNICATIONS SECTION

Re: 2020 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 2020 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 678-672-2831 or etc@telecomcounsel.com. Thank you for your attention to this matter.

Sincerely,



Victoria Martin  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.  
*Attorneys for i-wireless, LLC*

## **CLEC AND WIRELESS LIFELINE DATA REQUEST 2020**

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 15, 2020. Your response should include your company name, contact person, and email address.**

**Please answer the following questions as they relate to your company's Florida Lifeline customers, providing data for fiscal year July 1, 2019 through June 30, 2020.**

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

**Response: See Confidential Exhibit A**

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

**Response: See Confidential Exhibit A**

5. 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.**

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

**Response: See Confidential Exhibit A**

7. 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.**

8. 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.**

9. Please identify how your company is satisfying the FCC's minimum service standards requirement.

**Response: i-wireless is satisfying the FCC's minimum service standards by offering a broadband plan consisting of 250 Voice Minutes, Unlimited Text Messaging, and 3 GB of Data to new customers. i-wireless' existing customers are provided a Voice and Broadband plan consisting of 1000 Voice Minutes, Unlimited Text Messaging, and 3 GB of Data.**

10. 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.**

11. Please identify any issues you have experienced utilizing the National Verifier.

**Response: Now that the National Verifier has introduced an API to streamline the enrollment process, i-wireless is not currently experiencing any issues utilizing the National Verifier.**

12. Are you assisting customers with their Lifeline program applications through the National Verifier portal? If yes, please describe any issues you have experienced. If no, please describe your process for directing customers to apply with the National Verifier.

**Response: No, i-wireless is not currently assisting customers with their Lifeline program applications through the National Verifier. If a customer contacts our customer care department or visits our website, they are advised and routed to the National Verifier website to complete their qualification prior to enrolling with Access Wireless.**

13. Are the majority of your new Lifeline customers already enrolled in the National Verifier before requesting Lifeline service from your company?

**Response: Yes.**

14. Since the hard launch of the National Verifier in Florida, how has your company used the customer information received from Florida's Coordinated Enrollment Process?

**Response: Due to i-wireless' pending issue with the FCC on the AT&T service area, i-wireless has not been able to enroll any new subscribers since FL has hard-launched with the National Verifier.**

15. In the last year, has your company filed for any form of bankruptcy? If yes, please identify the chapter and the date filed.

**Response: i-wireless has not filed for any form of bankruptcy.**

16. Within the last two years, has your company been involved in any FCC enforcement actions relating to Florida Lifeline customers? If yes, please provide the date and FCC docket number.

**Response: i-wireless has not been involved in any FCC enforcement actions.**

17. Did you observe an increase in new Lifeline customers related to COVID-19 unemployment? Additionally, please provide or describe any form of promotion your company conducted to customers newly eligible for Lifeline due to COVID-19. Any additional general comments or information on how COVID-19 has affected your Lifeline customers in Florida are welcome.

**Response: No, due to i-wireless' pending issue with the FCC on the AT&T service area, i-wireless has not been able to enroll any new subscribers since FL has hard-launched with the National Verifier.**

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

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 2019						
8 2019						
9 2019						
10 2019						
11 2019						
12 2019						
1 2020						
2 2020						
3 2020						
4 2020						
5 2020						
6 2020						

	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 2018						
8 2018						
9 2018						
10 2018						
11 2018						
12 2018						
1 2019						
2 2019						
3 2019						
4 2019						
5 2019						
6 2019						

Public Version

Public Version

Number of customers denied Lifeline service, by category

		NLAD Failures, Invalid Address, Name/DOB Mismatch
7	2019	
8	2019	
9	2019	
10	2019	
11	2019	
12	2019	
1	2020	
2	2020	
3	2020	
4	2020	
5	2020	
6	2020	

Public Version

**EXHIBIT B**

**PUBLIC VERSION**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

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

[REDACTED]



# Free Smartphone

250 Minutes  
Unlimited Text  
3 GB of Data



## Access to jobs.

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

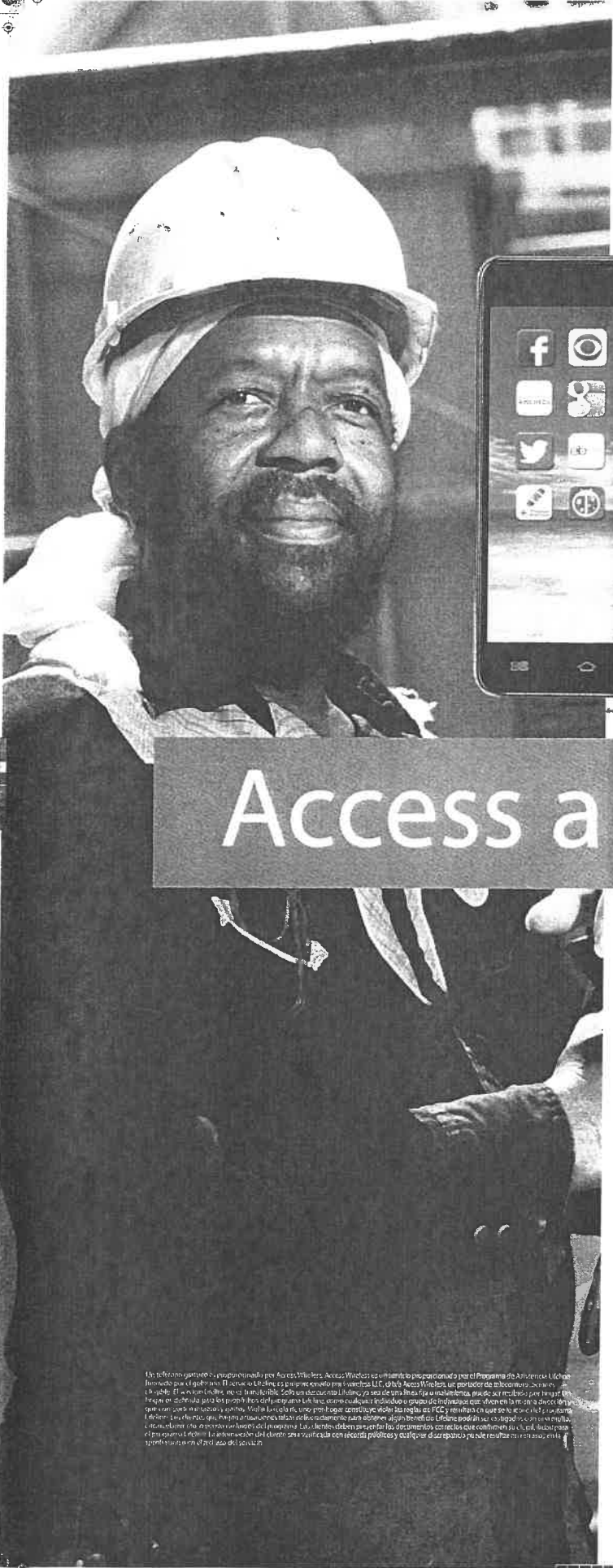
**Call**  
1-888-450-1838

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

access  
**WIRELESS**

A government-funded Lifeline Assistance Program

Free phone is provided by Access Wireless, a private provider for the government-funded Lifeline Assistance Program. Lifeline assistance is provided for household (LL) or individual (IL) subscribers who are eligible for Lifeline Assistance. Lifeline service is non-transferable. It is one of the ways to qualify for Lifeline Assistance. It is subject to the federal Lifeline program rules and may vary by state. For more information, please visit [www.accesswireless.com/lifeline](http://www.accesswireless.com/lifeline). For the purposes of the Lifeline program, all family members who reside at the same address and share income and expenses should be treated as one household. For more information on eligibility requirements, please visit [www.accesswireless.com/lifeline](http://www.accesswireless.com/lifeline). Lifeline service may be provided to eligible subscribers who are unable to pay for service. Lifeline service may be provided to eligible subscribers who are unable to pay for service. Lifeline service may be provided to eligible subscribers who are unable to pay for service. Lifeline service may be provided to eligible subscribers who are unable to pay for service.



# Teléfono Gratis

250 Minutos  
Textos Ilimitados  
3 GB de Datos



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.

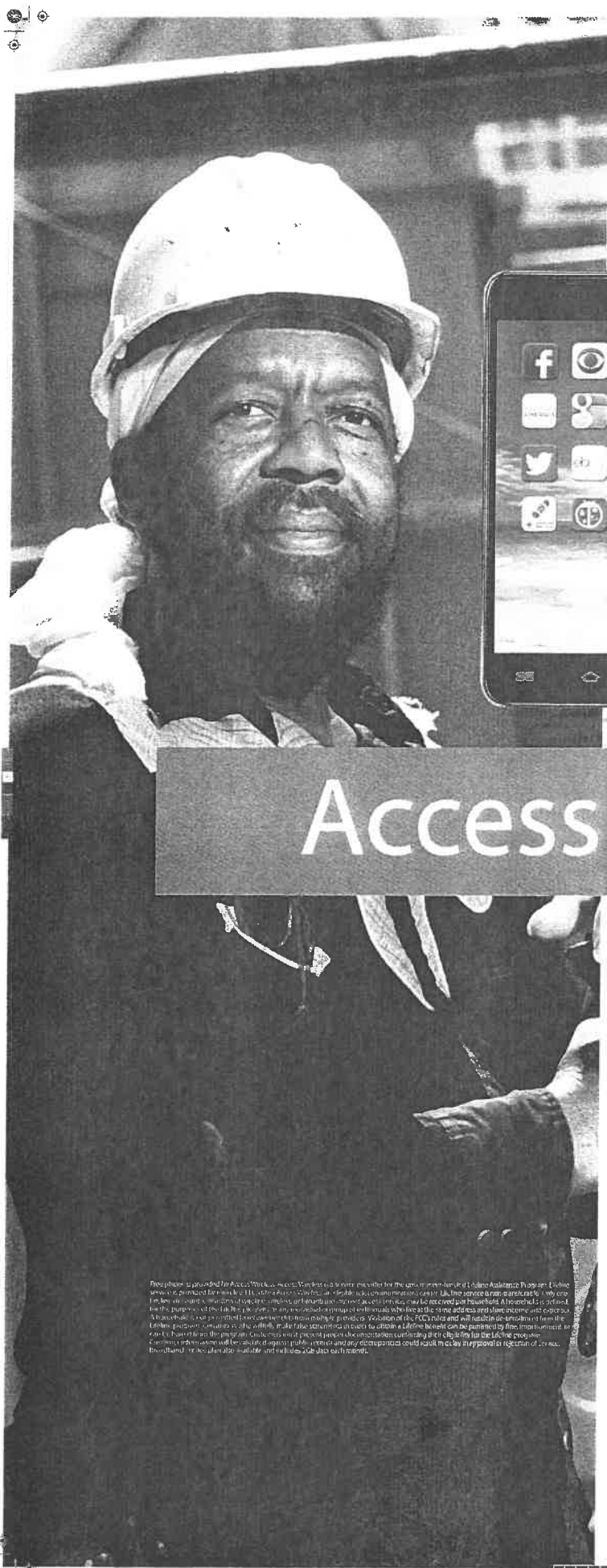
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1-888-450-1838

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**WIRELESS**

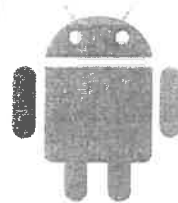
A government-funded Lifeline Assistance Program

Un teléfono gratuito es proporcionado por Access Wireless. Access Wireless es un miembro patrocinado por el Programa de Asistencia Lifeline financiado por el gobierno. El servicio Lifeline es proporcionado por Wireless L.L.C. d/b/a Access Wireless, un operador de telecomunicaciones autorizado. El servicio Lifeline no es limitado. Solo un número Lifeline ya sea de un área fija o inalámbrica, puede ser recibido por hogar. El programa de asistencia pública debe ser verificado por el operador de telecomunicaciones. Los beneficios de asistencia pública que califiquen a un individuo para recibir un teléfono gratuito son SNAP/Cupones de Alimentos, Medicaid o el Seguro de Ingreso Suplementario. Verifique los requisitos de elegibilidad en www.accesswireless.com. El programa de asistencia pública debe ser verificado por el operador de telecomunicaciones. Los beneficios de asistencia pública que califiquen a un individuo para recibir un teléfono gratuito son SNAP/Cupones de Alimentos, Medicaid o el Seguro de Ingreso Suplementario. Verifique los requisitos de elegibilidad en www.accesswireless.com.



# Free Smartphone

1000 Minutes  
Unlimited Text  
50 MB of Data



## Access to jobs.

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

**Call**

1-888-450-1838


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

**access WIRELESS**

A government-funded Lifeline Assistance Program

Phone is provided for Access Wireless. You may be a member for the government-funded Lifeline Assistance Program. Lifeline service is provided for qualifying low-income households. Lifeline service is available only for one line per household. A household is defined as a person or group of related individuals who share a common address and are not receiving other federal benefits for the purpose of the Lifeline program. An individual's participation in the program may be suspended if the individual has a second household or is not a member of the household. Participation in the program is subject to change without notice. Access Wireless is not responsible for any charges or fees associated with the use of the phone. Participation in the program is subject to change without notice. Access Wireless is not responsible for any charges or fees associated with the use of the phone. Participation in the program is subject to change without notice. Access Wireless is not responsible for any charges or fees associated with the use of the phone.





**Free  
Smartphone**

**250 Minutes  
Unlimited Text  
3 GB of Data**

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






 access  
**WIRELESS**<sup>®</sup>  
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 & 2 GB of Data for 30 days
	<b>\$35</b>	Unlimited Minutes, Unlimited Text & 3 GB of Data for 30 days
	<b>\$50</b>	Unlimited Minutes, Unlimited Text & 10 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).



**Free  
Smartphone**

**1000 Minutes  
Unlimited Text  
50 MB of Data**

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





**access  
WIRELESS**

A government-funded Lifeline Assistance Program.

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	<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.\*\*



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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).



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ACCESS  
**WIRELESS**

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Eligibility for this program is based on income and household size. See [www.accesswireless.com](#) for more information. Service provided by Assurance Communications, Inc. © 2014 Assurance Communications, Inc. All rights reserved.



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