

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of the Application of AmeriMex)
Communications Corp. d/b/a SafetyNet Wireless) Docket No. _____
Designation as an Eligible Telecommunications)
Carrier in the State of Florida)

**APPLICATION OF AMERIMEX COMMUNICATIONS CORP. D/B/A SAFETYNET
WIRELESS FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF FLORIDA**

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I. Introduction

Amerimex Communications Corp. d/b/a SafetyNet Wireless ("SafetyNet" or the "Company"), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"), Section 364.10 of the Florida Statutes, and Rule 25-4.0665 of the Florida Administrative Code, hereby applies to the Florida Public Service Commission (the "Commission") for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Florida.

SafetyNet seeks ETC designation solely to provide Lifeline service to qualifying Florida consumers, both Tribal and Non-Tribal; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund ("USF") for the purpose of participating in the Link-Up program or providing service to high-cost areas.¹

As demonstrated herein, and as certified in Exhibit A attached hereto, SafetyNet meets all the statutory and regulatory requirements for designation as an ETC in the State of Florida,

¹ Given that the Company only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

including the requirements outlined in the FCC's *Lifeline and Link Up Reform Order*,² *Lifeline Modernization Order*,³ and *Fifth Report and Order*.⁴ Rapid grant of SafetyNet's request, therefore, would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array of low-income Florida residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

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II. Company Overview

SafetyNet Wireless is a Georgia corporation with its principal offices located at 100 Main Street Suite 304 Safety Harbor FL 34695. SafetyNet Wireless has authority to conduct business in

² *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) ("*Lifeline and Link Up Reform Order*").

³ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*" or "*Lifeline Modernization Order*").

⁴ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, "*Fifth Report and Order*").

Florida as reflected in Exhibit B. SafetyNet Wireless does not have a parent company or subsidiaries. SafetyNet Wireless provides commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless networks of AT&T and T-Mobile USA, Inc. (“Underlying Carriers”) on a wholesale basis. SafetyNet Wireless provides these services as an ETC and is authorized to provide these services as an ETC in California, Colorado, Georgia, Illinois, Kentucky, Louisiana, Maryland, Michigan, Missouri, Nevada, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, West Virginia, and Wisconsin. SafetyNet Wireless has an application for ETC designation pending with the FCC.⁵ SafetyNet has applications for ETC designation pending in Arizona and Mississippi.

ETC State Designations			
Jurisdiction	Date Filed	Docket No.	Date Approved
Arizona	November 24, 2023	T-21281A-23-0315	Pending approval
Alabama	April 26, 2024	TR2438768	Pending approval
California	September 11, 2013	T-17455	December 4, 2014
Colorado	January 30, 2015	15A-0066T	December 11, 2015
Georgia	November 10, 2010	39089	November 21, 2011
Illinois	June 29, 2022	22-0428	June 29, 2023
Kentucky	April 3, 2013	2013-00301	March 26, 2014
Louisiana	April 27, 2022	S-36342	September 21, 2022
Maryland	April 19, 202	TE-12425	June 15, 2022
Michigan	March 14, 2014	U-17576	September 26, 2014
Mississippi	September 19, 2023	2023-UA-124	Pending approval
Missouri	May 28, 2020	RA-2020-0386	August 2, 2020
New Jersey	April 27, 2022	TE22040309	October 26, 2022
New York	May14, 2020	20-C-0236	July 16, 2020
Nevada	September 5, 2023	23-08024	December 18, 2023
Ohio	June 22, 2022	22-630-TP-UNC	December 14, 2022
Oklahoma	December 27, 2013	PUD 201300231	September 30, 2015

⁵ *In the Matter of Telecommunications Carriers Eligible to Receive Universal Service Support*, WC Docket No. 09-197, Amended Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Florida, Connecticut, Delaware, Maine, New Hampshire, North Carolina, New York, Florida, Texas, the Commonwealth of Virginia, Florida and the District of Columbia (Sept. 12, 2016).

Pennsylvania	June 19, 2013	P-2013-2369557	March 6, 2014
West Virginia	April 26, 2022	22-0409-T-PC	July 20, 2022
Wisconsin	November 15, 2023	17090-TI-101	January 12, 2024

Additionally, SafetyNet Wireless has been approved by the FCC to provide service under the Affordable Connectivity Program (“ACP”) in all states, plus the territories of Washington D.C, US Virgin Islands, and Puerto Rico.⁶

SafetyNet Wireless proposes to provide services in Florida throughout the service areas served by its Underlying Carriers, AT&T and T-Mobile. SafetyNet Wireless has a Compliance Plan approved by the Federal Communication Commission on December 26, 2012.⁷ By having an approved Compliance Plan, SafetyNet Wireless is exempt from the own-facilities requirement applicable to ETCs.⁸ SafetyNet Wireless will utilize the same procedures and operations set forth in the FCC-approved Compliance Plan for its provision of prepaid wireless Lifeline service and any additional or modified procedures and operations as necessary to comply with applicable regulations adopted or Orders issued subsequent to the approval of the Compliance Plan. SafetyNet Wireless does not request High Cost Support.

Attached as Exhibit E is a current list of SafetyNet Wireless’s officers, along with biographical information for each, showing that it has the expertise necessary to provide the

⁶ See FCC approval of Affordable Connectivity Program Application Number EBBA0001684 and Application Number EBBA0002786.

⁷ Attached as Exhibit C to this Application (exhibits to the Compliance Plan omitted). SafetyNet Wireless also attaches the Notice it filed with the FCC regarding its use of “SafetyNet Wireless” as a trade name as Exhibit D.

⁸ In its *Lifeline Reform Order*, the FCC decided to forbear from applying the federal Communications Act’s facilities requirement of section 214(e)(1)(A) to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program, subject to certain conditions. One of those conditions was: “the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.” *Lifeline Reform Order* at ¶ 368.

services specified herein. The management of SafetyNet Wireless are familiar with the financial and technical needs of a telecommunications company and of a Lifeline provider.

SafetyNet Wireless is financially and technically capable of offering Lifeline services.⁹ SafetyNet Wireless is an experienced Lifeline provider that has been serving Lifeline customers since 2012. SafetyNet Wireless does not intend to rely exclusively on universal service fund disbursements to operate, and will receive revenues from other sources, such as top-up minutes.

In 2019, SafetyNet Wireless's ETC designation in Wisconsin was revoked due to failure to respond to data requests which related to whether SafetyNet Wireless was serving customers in Wisconsin. The data requests were sent via email to an incorrect email address; further, SafetyNet Wireless's then-third-party compliance company neglected to inform SafetyNet Wireless of the issue. At the time of revocation, SafetyNet Wireless was serving no Wisconsin customers, as its expansion slowed shortly after designation due to changes in the Lifeline program and, subsequently, the COVID-19 pandemic. In 2023, SafetyNet reapplied for ETC designation with the Wisconsin Public Service Commission, which was granted on January 12, 2024.

Finally, SafetyNet Wireless is reselling the wireless services of AT&T and T-Mobile for both its Lifeline and non-Lifeline services. AT&T and T-Mobile provides wholesale capacity to numerous wireless resellers. AT&T and T-Mobile will provide SafetyNet Wireless with the network infrastructure and wireless transmission facilities needed for SafetyNet Wireless to offer service as a Mobile Virtual Network Operator ("MVNO"). AT&T and T-Mobile are large,

⁹ 47 CFR § 54.202(a)(4) requires a common carrier seeking ETC designation for Lifeline support to demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules. See Lifeline Reform Order ¶ 388. The FCC stated that the "relevant considerations" for satisfying this requirement would be whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.

nationwide carriers, and serve several other MVNOs offering wireless Lifeline products. SafetyNet Wireless's partnership with AT&T and T-Mobile further demonstrates SafetyNet Wireless is technically and financially capable of providing prepaid wireless Lifeline service.

III. The Commission Has Jurisdiction Over Designation of Wireless ETCs

Section 214(e)(2) of the Act provides state public service commissions with the "primary responsibility" for the designation of ETCs.¹⁰ Therefore, the Commission has the authority to designate SafetyNet Wireless as an ETC. Under the Act, a state public service commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). SafetyNet Wireless recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules¹¹ prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, the FCC decided to conditionally forbear from application of the federal Act's facilities requirement to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program.¹² Specifically, the FCC determined that conditional forbearance from the facilities requirement would apply if the carrier: (1) complied with certain 911 requirements and (2) filed and received approval of a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures other carrier will take to implement the obligations contained in the Lifeline Reform Order as well as further safeguards against waste, fraud and abuse as the Wireline Competition Bureau may deem

¹⁰ 47 U.S.C. § 214(e)(2).

¹¹ 47 C.F.R. § 54.201(i).

¹² *Lifeline Reform Order* ¶ 368.

necessary.¹³ SafetyNet Wireless certifies that it has met the requirements for conditional forbearance from the facilities requirement as demonstrated in its FCC-approved Compliance Plan.

SafetyNet Wireless requests that the Commission expeditiously process its ETC Petition so that it can quickly commence providing qualifying low-income Florida customers with affordable USF-supported wireless services during these challenging economic times for all state residents. Designation of SafetyNet Wireless as an ETC would further competition for wireless Lifeline service and would offer eligible consumers an additional choice of providers for accessing telecommunications services, representing a significant step towards ensuring that all low-income consumers share in the many benefits associated with access to wireless services.

IV. SafetyNet Satisfies the Requirements for ETC Designation per 47 C.F.R. § 54.201

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹⁴ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services, except where (as here) the FCC has forborne from the “own facilities” requirement. Applicants also must commit to advertise the

¹³ *Lifeline Reform Order* ¶ 368.

¹⁴ *USF Order*, at 8858-59, ¶ 145.

availability and rates of such services¹⁵ and provide additional information set forth in 47 C.F.R. § 54.202(a). As detailed below, SafetyNet Wireless satisfies each of the above-listed requirements.

A. SafetyNet Wireless Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as SafetyNet Wireless. In the Lifeline and Link Up Reform Order, the FCC granted forbearance from the “own-facilities” requirement for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹⁶

- (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, 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 providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

In accordance with the *Lifeline and Link Up Reform Order*, SafetyNet Wireless filed its Compliance Plan which the FCC approved on December 26, 2012.¹⁷ SafetyNet Wireless commits to providing Lifeline service in Florida in accordance with its FCC-approved Compliance Plan and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

¹⁵ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

¹⁶ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

¹⁷ See FCC Public Notice DA 12-2063.

B. SafetyNet Wireless Is a Common Carrier

SafetyNet Wireless is a resale-based Commercial Mobile Radio Service (“CMRS”) provider and is thus a common carrier.¹⁸

C. SafetyNet Wireless Will Provide All Supported Services

Through its Underlying Carriers, SafetyNet Wireless is able to provide all of the supported services required by Section 54.101(a) of the FCC’s Rules¹⁹ as follows:

1. Voice Telephony Services

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

Voice Grade Access to the Public Switched Telephone Network. SafetyNet Wireless provides voice grade access to the public switched telephone network (“PSTN”) through the purchase of wholesale CMRS services from its facilities-based Underlying Carriers.

Local Usage At No Additional Charge. SafetyNet Wireless offers rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. SafetyNet Wireless provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. Calls to 911 emergency services will always be free and will be available regardless of

¹⁸ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory “mobile services” category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) (“mobile services” providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) (“We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services.*”) (Emphasis added).

¹⁹ 47 C.F.R. § 54.101(a).

service activation status or availability of minutes. SafetyNet Wireless also complies with the FCC’s regulations governing the deployment and availability of E911 compatible handsets.

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.²⁰ “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”²¹ Nonetheless, SafetyNet Wireless’s offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. SafetyNet Wireless’s service, moreover, is not offered on a distance-sensitive basis and local and domestic long-distance minutes are treated the same.

2. Broadband Internet Access Services

Broadband Internet Access Service (“BIAS”) is a supported service as of December 2, 2016. The FCC has stated that BIAS consists of the ability for a user to receive “the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service.”²² SafetyNet Wireless provides BIAS to low-income consumers via resale of its Underlying Carriers’ mobile services.

D. SafetyNet Wireless Will Advertise the Availability of Supported Services

SafetyNet Wireless will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2) of the FCC’s

²⁰ See *Lifeline and Link Up Reform Order* at ¶ 367.

²¹ See *Id.* at ¶ 49.

²² See 47 C.F.R. § 8.2(a).

regulations. SafetyNet Wireless's advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined in the SafetyNet Wireless's Compliance Plan.²³

The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as print advertisements, direct marketing, social media and the Internet. SafetyNet Wireless will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment. SafetyNet Wireless may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.²⁴

SafetyNet Wireless will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service: (a) that the service is a Lifeline-supported service; (b) that only eligible consumers may enroll in the program; (c) what documentation is necessary for enrollment; and (d) that the benefit is limited to one per household consisting of either wireline or wireless service and is non-transferrable. SafetyNet Wireless will also explain that Lifeline is a government benefit program and that willfully making false statements to obtain Lifeline benefits may be punished by fine or imprisonment or result in being barred from the program. Additionally, SafetyNet Wireless will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

²³ See also *Lifeline and Link Up Reform Order* at Section VII.F.

²⁴ See attached Exhibit F for a sample advertisement from another state; advertisements will be updated for use in Mississippi upon ETC designation.

E. SafetyNet Wireless Requests Designation Throughout Its Service Area

SafetyNet Wireless is not a rural telephone company as defined in Section 153(37) of the Act.²⁵ Accordingly, SafetyNet Wireless is required to describe the geographic area(s) within which it requests designation as an ETC. SafetyNet Wireless requests designation as an ETC for the entire state of Florida, subject to the existence of its Underlying Carriers' facilities and corresponding coverage. SafetyNet Wireless understands that its service area overlaps with rural carriers in Florida, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers.

Therefore, designation of SafetyNet Wireless as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²⁶ While the federal rules require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement),²⁷ the FCC’s *Lifeline and Link Up Reform Memorandum Opinion and Order* authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.²⁸ In light of this forbearance, the Commission

²⁵ 47 U.S.C. § 153(37).

²⁶ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

²⁷ 47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b).

²⁸ See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

has the authority to designate ETCs such as SafetyNet Wireless in rural areas without concern for the service area conformance requirement.²⁹

F. Service Commitment Throughout the Proposed Designated Service Area

SafetyNet Wireless will provide service in Florida by reselling service which it obtains from its Underlying Carriers. These provider's networks are operational and largely built out. Thus, SafetyNet Wireless will be able to commence offering its Lifeline service to all locations served by its Underlying Carriers very soon after receiving approval from the Commission. In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification, SafetyNet Wireless commits to comply with the service requirements applicable to the support that it receives. Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.³⁰

G. Ability to Remain Functional in Emergency Situations

In accordance with 47 CFR §54.202(a)(2), SafetyNet Wireless has the ability to remain functional in emergency situations. As discussed, SafetyNet Wireless will utilize the national wireless networks of AT&T and T-Mobile to provide its Lifeline services. The Company understands that these Underlying Carriers' networks have access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. Indeed, these Underlying Carriers have repeatedly certified to the FCC that their

²⁹ See 47 C.F.R. § 54.207(c).

³⁰ See also *Lifeline and Link Up Reform Order* at ¶ 386.

networks function in emergency situations.³¹ The Underlying Carriers provide the same functionality to SafetyNet Wireless and its customers as these carriers provide to themselves and their own customers.

H. Commitment to Consumer Protection and Service Quality

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards³² and wireless applicants may also satisfy this requirement by complying with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. SafetyNet Wireless hereby commits to complying with the CTIA Consumer Code for Wireless Service. SafetyNet Wireless commits to satisfactorily resolve complaints filed with the Commission and will provide a Company point of contact through which all Lifeline complaints may be transmitted.

I. SafetyNet Wireless is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), SafetyNet Wireless is financially and technically capable of providing Lifeline-supported services. The Company was founded in 1998 and already provides Lifeline services as an ETC in 15 states. The Company began providing Lifeline wireless service in 2012.

SafetyNet Wireless has not been subject to enforcement actions or any other ETC revocation proceedings except for a revocation in Wisconsin as previously described. The Company has never had to file for bankruptcy protection. SafetyNet Wireless does not, and does

³¹ See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

³² See 47 C.F.R. § 54.202(a)(3).

not intend to, offer exclusively Lifeline-supported services—and is therefore not exclusively dependent on USAC for its revenue. SafetyNet Wireless will honor all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of SafetyNet Wireless has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company. SafetyNet Wireless will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carriers.

J. SafetyNet Wireless Will Comply with Certification and Verification Requirements

As mentioned above, SafetyNet Wireless will rely on the National Verifier for initial and annual verification of Lifeline eligibility in accordance with Section 54.410 of the FCC’s Rules.

K. SafetyNet Wireless Will Comply with Reporting Requirements

SafetyNet Wireless will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (*i.e.*, FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (*i.e.*, FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs.

L. SafetyNet Wireless Will Comply with Regulations Imposed by the Commission

SafetyNet Wireless is willing and able to comply with the rules and regulations that the Commission may lawfully impose upon the Company’s provision of service contemplated by this Petition. Pursuant to NAC 704.0097, SafetyNet requests a deviation from NAC 704.680461(1)(a), given the fact that SafetyNet, as a CMRS provider, is not required to obtain a certificate of public convenience and necessity from the Commission. SafetyNet further certifies that all federal USF funding received will be used for Lifeline support and will be flowed through to the direct benefit

of eligible, low-income consumers. On behalf of its Florida customers, SafetyNet will contribute to the federal and state USF, and the Company will remit all applicable surcharges and fees in Florida, including the E911 surcharge and TDD assessments. SafetyNet is also current with its annual CMRS registration fees. Upon Commission request, SafetyNet is prepared to answer questions and present additional testimony or other evidence about its services within the state.

V. Designation of SafetyNet as an ETC Would Promote the Public Interest

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.³³ Designation of SafetyNet Wireless as an ETC in Florida will further the public interest by providing Florida consumers, especially low-income consumers, with low prices and high quality services. Many low-income customers in Florida have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating SafetyNet Wireless as an ETC would significantly benefit low-income consumers eligible for Lifeline service in the State of Florida—the intended beneficiaries of universal service.

A. Advantages of SafetyNet Wireless’s Service Offering

³³ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

The public interest benefits of SafetyNet Wireless's wireless service include larger local calling areas (as compared to traditional wireline carriers); the convenience, portability and security afforded by mobile telephone service; the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge; the ability of users to use the supported service to send and receive unlimited "SMS" or text messages at no additional cost; the ability for customers to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted (and the courtesy of free low-balance alerts); the option to purchase additional international calling at affordable rates; the opportunity for customers to receive service without going through a credit check or deposit requirement, or committing to a long-term service contract; and access to 911 and E911 service in accordance with current FCC requirements.

Low-income individuals can greatly benefit from the advantages offered by the Company's Lifeline service, which provides access to wholly-supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members. It is a commonly accepted fact that in today's market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location. SafetyNet Wireless's prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues. Providing SafetyNet Wireless with the authority necessary to offer discounted Lifeline service to those without—or most in danger of losing—wireless

service undoubtedly promotes the public interest.

Finally, grant of SafetyNet Wireless's Petition will serve the public interest in increasing the number of ETCs in Florida. By granting ETC status to SafetyNet Wireless, the Commission will enable SafetyNet Wireless to increase the number of Florida residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Florida. In sum, ETC designation in Florida would enable SafetyNet Wireless to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*; namely, SafetyNet Wireless would provide "increased consumer choice, high-quality service offerings, and mobility,"³⁴ as well as the safety and security of effective 911 and E911 services.³⁵

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers, for more than three decades.³⁶ SafetyNet Wireless's designation as prepaid wireless Lifeline-only ETC will bring increased competitive choice and unique advantages to qualifying Ohio consumers. The goals of universal service mandated by Congress will be served by designation of SafetyNet Wireless as a prepaid wireless Lifeline-only ETC.³⁷

The wireless service provided by SafetyNet Wireless to Lifeline-eligible customers will give customers access to a phone service option they could use inside and outside of the home, increasingly a requirement for individuals to acquire and maintain employment, communicate with

³⁴ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

³⁵ See *Id.* at 3391 ¶ 23.

³⁶ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

³⁷ 47 U.S.C. § 254.

family members, and participate in day-to-day activities. SafetyNet Wireless’s presence in the market will increase the variety of options available to Lifeline-eligible consumers, and will allow Lifeline-eligible consumers to choose both the type and provider of voice service they would like to use. Existing providers will likely improve their own service quality and offerings to remain competitive.

SafetyNet’s ETC designation will bring another competitive alternative to low-income consumers in Florida, and will exert further competitive pressures on existing wireless Lifeline providers operating in Florida. This furthers the federal Act’s goal of ensuring that quality communication services are available at “just, reasonable, and affordable rates.”³⁸ As the FCC has observed, “an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”³⁹

Designation of SafetyNet Wireless as an ETC will promote competition and innovation, spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of SafetyNet Wireless as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.⁴⁰ Introducing SafetyNet Wireless into the market as an additional wireless ETC provider will afford low-income Florida residents a wider choice of providers and

³⁸ 47 U.S.C. § 254(b)(1).

³⁹ *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

⁴⁰ *See* 47 U.S.C. § 254(b)(1).

available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

C. Impact on the Universal Service Fund

The impact of SafetyNet Wireless's designation as an ETC on the USF will be negligible, in light of the fact that SafetyNet Wireless is not seeking high-cost support. The Lifeline program, unlike high-cost support, is predicated on per-customer reimbursement.⁴¹ The overall size of the program is thus capped by the number of qualified consumers in a state, and further limited by eligibility, utilization, and de-enrollment standards.⁴² SafetyNet Wireless intends to strictly adhere to such standards, as demonstrated by its FCC-approved Compliance Plan.

SafetyNet Wireless will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that SafetyNet Wireless's customers are not eligible or are receiving duplicative support either individually or within their household is greatly minimized. SafetyNet Wireless's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of

⁴¹ See, e.g., WC Docket No. 09-197, *Telecommunications Carriers Eligible for Universal Service Support*, Order, DA 12-1339, ¶ 9 (Aug. 16, 2012).

⁴² See WC Docket Nos. 11-42, 03-109, 12-23 and CC Docket No. 96-45, *Wireline Competition Bureau Issues Progress Report on the Lifeline Program Savings*, Public Notice, DA 12-1232 (July 31, 2012).

affordable wireless services to low-income consumers.

VI. Conclusion

Based on the foregoing, designation of SafetyNet as an ETC in the State of Florida complies with the requirements of Section 214(e)(2) of the Act and is clearly in the public interest.

WHEREFORE, SafetyNet hereby respectfully requests that the Commission promptly designate SafetyNet as an ETC in the State of Florida for the purpose of participating in the Lifeline program.

Respectfully submitted,



FosterDanowsky

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Exhibit A

Certification

STATE OF FLORIDA §

COUNTY OF PINELLAS §

I, Nicholas Metherd, Chief Operations Officer of AmeriMex Communications Corp. d/b/a SafetyNet Wireless (the "Company"), hereby state upon oath and affirmation of belief and personal knowledge that the matters, facts and statements set forth in the foregoing Petition are true to the best of my knowledge and belief.



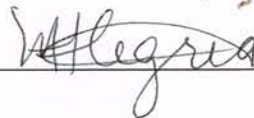
Nicholas Metherd

SUBSCRIBED AND SWORN TO BEFORE ME,

the undersigned Notary Public this 4th day of JUNE, 2024.



[SEAL]



Notary Public in and for the State of Florida

EXHIBIT B

Authority to Conduct Business in Florida



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SAFETYNET WIRELESS

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Exhibit C

Compliance Plan and Approval Order

**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
)	
AmeriMex Communications Corp. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A))	WC Docket No. 11-42
)	

AMERIMEX COMMUNICATIONS CORP. REVISED COMPLIANCE PLAN

AmeriMex Communications Corp. (“AmeriMex” or “Company”), by its attorney, hereby files its compliance plan outlining the measures it will take to implement the conditions imposed by the Federal Communications Commission (“Commission”) in its *Order* released February 6, 2012.¹ AmeriMex respectfully requests expeditious approval of this plan so that it may continue to provide critical Lifeline services to qualified low income customers.²

BACKGROUND

The Commission’s *Order* grants non-facilities-based carriers blanket forbearance from Section 214(e)(1)(A), which requires an ETC to provide supported services, at least in part, over its own facilities, in order to receive federal Lifeline support.³ Those ETCs that were providing

¹ *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*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) (“*Order*”) at ¶¶ 522-523.

² AmeriMex provides Lifeline services in Georgia pursuant to its designation as an Eligible Telecommunications Carrier (“ETC”) by the Georgia Public Service Commission. Georgia Public Service Commission, *Order on Application For Designation as Eligible Telecommunications Carrier*, Document Filing No. 139089, Docket No. 32948 (Nov. 21, 2011). The wireless service is provided by AmeriMex Wireless, a division of AmeriMex. The company may expand its Lifeline offerings to eligible customers in additional states following approval of this compliance plan.

³ *Order* at ¶1.

Lifeline services prior to the effective date of the *Order*, were required to meet certain obligations set forth in the *Order*. Those obligations, created to guard public safety and prevent ongoing waste, fraud and abuse of the Lifeline program, are:⁴

- 1) Compliance with certain 911 and enhanced 911 public safety requirements, and
- 2) Submission before July 1, 2012 of the carrier's compliance plan; which must be approved by the FCC before the carrier could seek additional ETC designations.

As required by the *Order*, the compliance plan must include details pertaining to the carrier's 1) financial, operational and technical capabilities, 2) rates, terms and conditions of service, 3) procedures for determining initial eligibility of its Lifeline services, as described in Appendix C of the *Order*, 4) procedures for enrollment and annual recertification, 5) policies for compliance with public safety and 911/E911 access, 6) policies for compliance with marketing disclosure requirements and 7) intended efforts to prevent waste, fraud and abuse of the Lifeline program.

A. COMPLIANCE PLAN

AmeriMex commits to comply with conditions that the Commission has set forth in the *Order*, the requirements described in this Compliance Plan, and any and all laws and regulations that govern the Lifeline-supported prepaid wireless service.

I. Financial, Operational and Technical Information

AmeriMex does not operate under any other names, nor does it have any holding company, operating company or affiliates.⁵ AmeriMex, a privately held Georgia corporation, began offering telecommunications services in 1998. Over the course of six years, AmeriMex

⁴ *Id.* at ¶368.

⁵ *Id.* at ¶390.

expanded from a long distance calling card distributor to a competitive local exchange carrier (“CLEC”), providing residential wireline service to more than 20,000 customers. As a CLEC, AmeriMex’s operations spanned 10 states and included a distribution network of approximately 800 Hispanic merchants.⁶ In 2006, AmeriMex became a full facilities based carrier. The Company has a MetaSwitch VP3510 which supports TDM and IP interfaces. Currently, AmeriMex offers domestic and international calling services, and since December 2011, the Company has begun offering wireless ETC service. AmeriMex provides wireless ETC services to approximately 70,000 customers by reselling the services of Ready Mobile, a reseller of Sprint and Verizon Wireless services. The wireless ETC service represents less than 30 percent of AmeriMex’s total revenues.

The Company’s key management, including its founder and Chief Executive Officer, Don Aldridge, and the Vice President of Technology, Alejandro Caipa, has significant technical and managerial experience providing prepaid, wireline and wireless services to consumers.⁷ Mr. Aldridge is a Certified Public Accountant and holds a Masters of Business Administration from Virginia Tech. Mr. Caipa, employed by AmeriMex for more than 10 years, has a degree in electrical engineering and a Masters degree in Technology Management from Georgia Tech. Mr. Caipa previously worked for ETB, a telephone company in Bogota, Columbia. The Company increased revenues by approximately 21% between 2010 and 2011 and reported profits for both years. In addition to its financial and technical qualifications, AmeriMex has the operational capabilities to provide quality service, including providing 911/E911.⁸

⁶ http://www.amerimex.biz/index.php?option=com_content&view=article&id=89&Itemid=65 (retrieved Mar. 26, 2012).

⁷ *Order* at ¶¶387-388.

⁸ 47 C.F.R. §54.202(a)(2).

II. Lifeline Rate Plans

AmeriMex offers the following rate plans, which are available to eligible Lifeline subscribers.⁹ Each rate plan is subject to a one-time \$25 activation fee.¹⁰

250 Free Minutes and a Free Phone: This plan includes a phone plus 250 free voice minutes. Unused minutes expire at the end of the last day of their cycle. The account is then automatically replenished with the next month's 250 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes in increments of \$5, \$10, \$20, \$30 and \$50 denominations, with the price ranging from \$.10 to \$.03 per minute. This plan includes nationwide coverage, voice mail, call waiting, Caller ID and text-messaging (one text equates to one minute of airtime).

125 Free Minutes and a Free Phone: This plan includes a phone plus 125 free minutes. Unused minutes may be carried over to the next month for up to three months. Each month, the account is automatically replenished with the next month's 125 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes in increments of \$5, \$10, \$20, \$30 and \$50 denominations, with the price ranging from \$.10 to \$.03 per minute. This plan includes nationwide coverage, voice mail, call waiting, Caller ID and text-messaging (one text equates to one minute of airtime).

68 Free Minutes and a Free Phone: This plan includes a phone plus 68 free minutes. Unused minutes may be carried over to the next month for up to 12 months. Each month, the account is automatically replenished with the next month's 68 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes in increments of \$5, \$10,

⁹ *Order* at ¶390, see Exhibit B. At this time, AmeriMex is only offering Lifeline services in Georgia.

¹⁰ This fee helps to offset the cost of the handsets provided to Lifeline subscribers.

\$20, \$30 and \$50 denominations, with the price ranging from \$.10 to \$.03 per minute. This plan includes nationwide coverage, voice mail, call waiting, Caller ID and text-messaging (three texts equate to one minute of airtime).

There is no additional charge for toll calls. Calls to 911 are free.

III. Certification of Lifeline Customers' Eligibility

A. Policy

AmeriMex will comply with all certification and verification requirements for Lifeline eligibility in accordance with the *Order*, and supplement its efforts, as necessary, in states where it is designated as an ETC. For any states which do not mandate Lifeline support and/or which do not have established rules of procedure in place, AmeriMex will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements.

B. Eligibility and Enrollment

AmeriMex will implement procedures to determine a consumer's Lifeline eligibility. The baseline eligibility, developed to counter the "patchwork" of state by state criteria, to streamline the enrollment process and to facilitate the completion of the National Database by the end of the 2013, is participation in one of several federal subsidy programs, including, but not limited to, Food Stamps, Medicaid and WIC programs, or evidence that the consumer's income is at or below 135% of the Federal Poverty Guidelines ("FPG"). States may elect to "adopt participation in certain federal or state assistance programs not included in the Commission's list of eligible programs...provided the program is based on income or factors directly related to income."¹¹ Participation in qualifying programs may be determined through

¹¹ *Order* at ¶65, FN 168.

the use of state or national data sources (where available) or provided directly from the consumer in the form of supporting documentation. AmeriMex will not retain copies of the consumer's supporting documentation, but will retain details regarding the type of documentation presented and the date such documentation was presented.

AmeriMex will not provide wireless ETC service to any individual that does not have a valid government issued identification. AmeriMex also conducts real time address verification and those addresses are crosschecked against any other providers serviced by CGM, LLC.¹²

C. Certification Procedures

AmeriMex will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting AmeriMex, or one of its merchant distributors, in person or via telephone, facsimile, or the Internet. AmeriMex will have direct contact with all customers applying for Lifeline service, either in person through its employees, agents or representatives, via the Company's website, via the telephone (including facsimile) or mail. AmeriMex will provide Lifeline-specific training to all personnel, whether employees, agents or representatives at authorized locations, that interacts with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. AmeriMex understands and acknowledges its responsibility for the acts and omissions of its employees, agents and representatives.¹³

Consumers may be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to AmeriMex's website, which will contain a

¹² CGM's program allows AmeriMex to crosscheck for duplicates within AmeriMex's existing customer database and to establish customer accounts in real time.

¹³ *Order* at ¶110.

link to information regarding its Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Consumers will be provided with printed information describing AmeriMex's Lifeline program, including eligibility and usage requirements and disclosures that clearly indicate that consumers are required to certify the documentation presented, under the penalty of perjury, which may result in disqualification from the program, a penalty or imprisonment. Consumers opting to contact AmeriMex using the toll-free telephone number will be provided verbal details regarding the available Lifeline services, as well as the rates, conditions or terms of service, including the ongoing requirement to regularly update certain information and to re-certify eligibility, and the requisite acknowledgements and certifications.¹⁴ Details regarding the separate points of contact (retail, telephone or internet) are provided below.

AmeriMex's application form for its wireless service will identify that it is a "Lifeline" application. The AmeriMex application form, attached hereto as Exhibit A, will include two sections to be completed by the applicant. The first section requires applicants to provide 1) personal information such as name, address, date of birth, last four digits of their social security number ("SSN") and 2) identify, with a check mark, and certify, using their initials, which qualifying program(s) they are currently participating in or if they have a household income which is at or below the 135% of the FPG and the number of household members and total income. The second section of the application form will require applicants to identify, with a check mark, and certify, with a complete signature and date, under penalty of perjury, certain statements, including, but not limited to, the following:

¹⁴ See Call Center Script at Exhibit C.

The information contained within this application is true and correct to the best of his or her knowledge. I acknowledge that providing false or fraudulent documentation in order to receive Lifeline benefits is punishable by law and may result in being barred from the program.

I understand that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment.

I have provided documentation of eligibility.

I understand that I and my household can only have one Lifeline-supported telephone service. AmeriMex has explained the one-per household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government.

I attest to the best of my knowledge that I and no one else in my household is receiving a Lifeline supported service from any other land or wireless company such as Safelink, Assurance, or Reachout Wireless.

I understand my AmeriMex Wireless Lifeline service is non-transferrable. I may not transfer my service to any individual, including another eligible low-income consumer.

I will notify AmeriMex Wireless within thirty (30) days of moving.

I will notify AmeriMex Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:

1. My annual household exceeds 135% FPG.
2. If any member of my household, including myself, is receiving more than one Lifeline supported service.
3. I no longer satisfy the criteria for receiving Lifeline support.

AmeriMex Wireless has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it

will result in de-enrollment and termination of my AmeriMex Wireless Lifeline service.

Moreover, the application form will require applicants to provide, in addition to any change in eligibility status referenced above, any changes in personal information to the ETC within 30 days. Finally, the application form will also include an acknowledgement and consent section, written in clear, easily understandable language that indicates that in order to prevent the provision of duplicate services and ensure the proper administration of the Lifeline program certain subscriber information, including a subscriber's full name, residential address, date of birth, the last four digits of the social security number, the telephone number associated with the Lifeline service, dates of Lifeline service initiation and termination (if applicable), and the subscriber's basis for qualification for participation in the Lifeline program (i.e., the name of the state or federal program or an indication that the subscriber's income is at or below 135% FPG), will be transmitted to the Lifeline program administrator (currently the Universal Service Administrative Company (USAC)), and that failure to provide such consent will result in the denial of Lifeline benefits. AmeriMex will update its customer records and all associated state and national databases within 10 business days of notification that the customer has changed addresses.

As disclosed below, and as part of submitting its FCC Form 497 request for Lifeline reimbursement, AmeriMex, will process and validate its subscribers regularly and confirm usage (either monthly or quarterly) in order to prevent: (1) Duplicate Same-Month Lifeline Subsidies ("Double Dip," i.e., any household that is already receiving a Lifeline subsidy from AmeriMex will be automatically prevented from receiving a second lifeline subsidy in that same month); and (2) Inactive lines receiving subsidy (i.e., since AmeriMex does not issue monthly bills, it

will have systems in place to determine if lines have been inactive for more than 60 days to avoid seeking and receiving subsidies for active lines).

As mentioned above, AmeriMex provides several points of contact for consumer interaction. In retail settings, consumers will interact with one or more of AmeriMex's Lifeline trained agents or representatives (collectively the "AAR"). The AAR will provide the applicant with printed information describing AmeriMex's Lifeline program, including eligibility requirements and enrollment instructions. The AAR will also verbally explain the Lifeline benefit (i.e. a non-transferable government benefit, limited to one-per-household) and the qualification (income or program based), documentation (i.e. government issued identification, address, pay stubs, tax returns, benefit statements etc.) and certification and recertification requirements (i.e. penalty of perjury, head of household etc.) of the Lifeline program. Once the AAR has determined that the applicant is a candidate for Lifeline service, the applicant will be asked to complete the Lifeline application. The AAR will review the application and all supporting documentation. The AAR will confirm (via review of AmeriMex's existing customer database) if the applicant or any other individual at the stated address is currently receiving Lifeline service from AmeriMex.¹⁵ The AAR will also review all available federal or state databases to determine if the applicant is receiving a Lifeline benefit from another provider. If the applicant is not currently receiving a Lifeline benefit, the application will be approved, sent to AmeriMex's customer service department for inclusion in all internal and external (federal and state) databases within 10 days, if applicable, and the applicant will be provided with a

¹⁵ As indicated above, AmeriMex will also crosscheck addresses against any other providers serviced by CGM, LLC. If the AAR determines that another individual is receiving Lifeline benefits at the applicant's address, he or she will be provided with an opportunity to certify that more than one household resides at that address and that those individuals are part of a separate household. *Order* at ¶77. Pursuant to the *Order*, USAC will provide the requisite document on which the applicant will attest to multiple households.

handset. The AAR will, using the provided handset, connect the applicant to an AmeriMex customer service representative (“ACSR”) who will review the customer account information with the applicant, verifying their personal information, basis for qualification and presentation of proper documentation, and then guide the customer through the activation of the handset and completion of the initial outgoing call.¹⁶ To guarantee accuracy in storing primary addresses associated with customers receiving Lifeline service, AmeriMex will record in its information database (or a national database, when available) the subscriber’s address as recognized by the United States Postal Service.

Customers who do not complete the application process in person must return the signed application and supporting documentation to the Company by mail, fax, email or other electronic transmission in order to qualify and initiate service. The Company intends to accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws and may verify signatures via interactive voice response systems (“IVR”). Processing of consumers’ applications, including review of all application forms and relevant documentation, will be performed under AmeriMex’s supervision by personnel experienced in the administration of the Lifeline program. AmeriMex will ensure that all required documentation is taken care of properly by using state-specific compliance checklists.

¹⁶ The customer contact between the ACSR and the applicant at the activation phase also satisfies the “deal directly” obligation established by the Commission in the Tracfone Order. *See Federal-State Joint Board on Universal Service, Petition of Tracfone Wireless, Inc. for Forbearance from 47 U.S.C. Section 214(e)(1)(A) and 47 C.F.R. Section 54.201(i)*, 20 FCC Rcd 15095, 15104 (2005). Additionally, this contact also provides AmeriMex with an opportunity to reaffirm the applicant’s qualification *prior to* seeking reimbursement for Lifeline funds on its FCC Forms 497.

Notwithstanding the foregoing with respect to program or income eligibility, for states that require AmeriMex to enroll subscribers identified by the state or as eligible in a state or federal database, AmeriMex may continue to rely on the state or federal identification or database, if applicable. As mentioned above, when possible, AmeriMex will access a state or federal database to make determinations about customer eligibility. As part of the process, the Company will note in its records the date of review and what data was relied upon to confirm the customer's eligibility for Lifeline. Where a state agency or third-party administrator is responsible for the initial determination of eligibility, AmeriMex will rely on the state identification or database and maintain a record of the date of review.

Alternatively, the application process for applying for a Lifeline benefit via telephone is similar to the retail setting described above. Applicants will be verbally informed by an ACSR of the qualification, documentation and certification requirements for the Lifeline benefit. Applicants may also be directed to the Company's website for additional information. The ACSR will employ a script similar to that provided hereto as Attachment C. The ACSR will determine, based on the applicant's responses, if they qualify for the Lifeline benefit. The conversation between the ACSR and the applicant, specifically the applicant's responses to the certification statements, may, in some instances, be recorded, through the use of an IVR system. If the applicant qualifies for the Lifeline benefit, they will be obligated, as necessary, to provide (via facsimile or U.S. mail) the supporting documentation prior to final approval for Lifeline service. Upon final approval, a handset will be mailed to the applicant's residential address on record and will require signature at delivery. The applicant's service will be activated upon the completion of the initial outbound call to AmeriMex's customer service department. AmeriMex

will not seek reimbursement until a phone has been activated. In the event the applicant does not qualify, the ACSR will explain the reason for denial of service.

Finally, the online application process requires an applicant to review the qualification, documentation and certification requirements as they move through progressive screens on the Company's website. The website will provide in clearly written and easily distinguishable language all the qualification and documentation requirements and mandatory certifications outlined in the *Order*, including but not limited to, that Lifeline is a non-transferable government benefit, limited to one-per-household, with household clearly defined, requires supporting documentation and ongoing recertification obligations and is subject to penalties and imprisonment for fraud. Similar to the telephone application process, the online applicant will be required to separately submit supporting documentation to the Company prior to final approval of Lifeline service and the receipt of a handset.

D. Annual Verification Procedures

As required by the Commission's *Order*, AmeriMex will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from AmeriMex, and to the best of his or her knowledge, no one else at the subscriber's household is receiving a Lifeline supported service. Pursuant to the *Order*, AmeriMex will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report those results to USAC by January 31, 2013.

Participating Lifeline consumers will be notified prior to their service anniversary date that they *must* confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on

record with AmeriMex. The Company may also elect to notify customers in advance of their anniversary date via a free text message.

The notification will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact AmeriMex to complete verification. The text message notice will include a brief description, including a statement that additional action is required by the customer. Customers will have 30 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from AmeriMex, and return the form to AmeriMex by mail. Failure to respond to the notice and its obligation to certify the consumers continued eligibility will result in termination of their Lifeline service. The Company will notify subscribers in writing of service termination for not responding to the annual certification within 30 days. Anyone who does not respond within 30 days, demonstrating that his or her Lifeline service should not be terminated, will otherwise be de-enrolled within five business days after the expiration of the 30-day period. Consumers that wish to de-enroll from the Lifeline program can visit a retail location or contact AmeriMex's customer service department via telephone.

In the future, certification may also be obtained through an IVR system or a text message. In states where a state agency or third party has implemented a database that carriers may query to re-certify eligibility, the Company will query the database and maintain a record of what data was used to re-certify eligibility and the date of re-certification. At this time, AmeriMex's customers may complete the verification process by mail only. The Company may offer additional options, such as IVR and web-based methods, in the future.

IV. 911 and E/911 Access

AmeriMex will provide all of its Lifeline subscribers with access to emergency calling services at the time the Lifeline service is initiated. Such 911 and E911 access will be available from AmeriMex handsets regardless of the status of the subscriber account or the airtime balance associated with the handset. Under current practice, access to such emergency services is still made available to subscribers whether their account is active, suspended, terminated, or has reached the minimum required airtime balance.

V. E911-Compliant Handsets

AmeriMex will ensure that all handsets shipped to Lifeline service subscribers will be E911-compliant. All of the Company's mobile devices are 911 and E911-compliant. In the event that an existing subscriber has a noncompliant handset, the Company will immediately replace such device with an E911-compliant handset at no additional charge to the subscriber.

VI. Uniform Marketing Materials

AmeriMex will ensure that all of its marketing materials, including "email, web, and social networking media and outdoor signage", consistently disclose or display, "in clear, easily understood language in all such marketing materials that the offering is a Lifeline-supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and that the program is limited to one benefit per household, consisting of either wireline or wireless service."¹⁷ Additionally, all marketing materials, as well as the Lifeline application form, will indicate that the Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

¹⁷ See Exhibit D.

VII. Measures to Prevent Waste, Fraud, and Abuse

AmeriMex will implement certain procedures in order to deter, identify and remove customers that may be attempting to abuse of the Lifeline program, inadvertently or intentionally.

A. Non-usage Policy

AmeriMex will implement a non-usage policy in which it monitors usage (only, not content) to identify Lifeline customers that have not used their Lifeline service for a period of 60 consecutive days. Upon determination of non-usage, AmeriMex will immediately cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. Once AmeriMex determines that a Lifeline customer has been inactive for 60 days, it will promptly notify the customer that the customer is no longer eligible for AmeriMex's Lifeline service subject to a 30-day grace period during which the customer's account will remain active. If the customer does not respond to AmeriMex's efforts, and the customer remains inactive (fails to send or receive voice calls or text messages, makes a payment or adds minutes to the account), AmeriMex will deactivate the Lifeline services for that customer. In addition, AmeriMex will not seek to recover a Federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

B. Customer Education with Respect to Duplicates

As indicated above, AmeriMex will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as the monthly or quarterly subscriber review undertaken during the preparation of the FCC Form 497. In addition to this ongoing due

diligence, AmeriMex will also review subscriber records in preparation for the Company's annual recertification to USAC.

AmeriMex will ensure that each of its sources presenting Lifeline information, including the call center, customer application form, and website will emphasize the limitation of the "one Lifeline phone per household" restriction (see Exhibit A).

C. Cooperation with State and Federal Regulators

AmeriMex has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Getting customer consent to provide, and providing state commissions (PUC), the FCC or USAC upon request with, data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, AmeriMex agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if AmeriMex's investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that AmeriMex's Lifeline service should be discontinued

such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and Order (Section III, B.).

- AmeriMex agrees to comply with all certification requirements annually and when submitting for reimbursements from USAC.¹⁸

¹⁸ See, for example, *Order* at ¶¶125-28, 398.

CONCLUSION

AmeriMex submits that this Compliance Plan fully satisfies the conditions set forth in the Commission's *Order* granting forbearance to the Company. The aforementioned policies and procedures are in place to safeguard against misuse of the Company's Lifeline services, as well as to prevent waste, fraud, and abuse of the Lifeline program. AmeriMex procedures also ensure public safety by ensuring access to 911 and E911 services. Consequently, AmeriMex respectfully requests that the Commission expeditiously approve this Compliance Plan so that AmeriMex may continue providing the benefits of much-needed Lifeline service to qualifying low-income consumers in Georgia and possibly expand to additional states.

Respectfully submitted,

AMERIMEX COMMUNICATIONS CORP.

/s/

Glenn S. Richards
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street NW
Washington D.C. 20037
(202) 663-8215

Its Counsel

December 6, 2012

VERIFICATION

I hereby verify that I have read the foregoing AmeriMex Communications Corp. Compliance Plan; and that to the best of my knowledge, information and belief the information stated therein is true and accurate.

AmeriMex Communications Corp.

By: Don Aldridge

Title: Chief Executive Officer

Date: December 6, 2012



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 12-2063

Release Date: December 26, 2012

WIRESLINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF AIRVOICE WIRELESS, AMERIMEX COMMUNICATIONS, BLUE JAY WIRELESS, MILLENNIUM 2000, NEXUS COMMUNICATIONS, PLATINUMTEL COMMUNICATIONS, SAGE TELECOM, TELRITE AND TELScape COMMUNICATIONS

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves the compliance plans of nine carriers: AirVoice Wireless, LLC (AirVoice); AmeriMex Communications Corp. (AmeriMex); Blue Jay Wireless, LLC (Blue Jay); Millennium 2000, Inc. (Millennium 2000); Nexus Communications, Inc. (Nexus); PlatinumTel Communications, LLC (PlatinumTel); Sage Telecom, Inc. (Sage); Telrite Corporation (Telrite); and Telscape Communications, Inc. d/b/a Telscape Wireless (Telscape). The compliance plans were filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.¹

The Act provides that in order to be designated as an eligible telecommunications carrier (ETC) for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services . . .”² The Commission amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.³ As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by providing operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.⁴ In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement,

¹ See *Lifeline and Link Up Reform and Modernization et al*, WC Docket No.11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6816-17, paras. 379-380 (2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

² 47 U.S.C. § 214(e)(1)(A).

³ See *Lifeline Reform Order*, 27 FCC Rcd at 6678, para. 47; see also 47 C.F.R. § 54.101(a).

⁴ See *Lifeline Reform Order*, 27 FCC Rcd at 6812, para. 366, App. A; *Connect America Fund et al*, WC Docket 10-90, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*). Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Blanket Forbearance Compliance Plan, WC Docket Nos. 09-197 and 11-42, Q Link Wireless, LLC’s Third Amended Compliance Plan at 4 n. 2 (filed July 30, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under sections 54.101 and 54.401 of the Commission’s rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.⁵ Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁶

The Bureau has reviewed the nine plans listed in the Appendix for compliance with the conditions of the *Lifeline Reform Order* and now approves those nine compliance plans.⁷

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Michelle Schaefer, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

- FCC -

⁵ See *Lifeline Reform Order*, 27 FCC Rcd at 6813-6817, paras. 368-381.

⁶ See *id.*, 27 FCC Rcd at 6814, 6819, paras. 373, 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

⁷ The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. See *Lifeline Reform Order*, 27 FCC Rcd at 6679-80, 6818-19, paras. 50, 387.

APPENDIX

Petitioner	Compliance Plans As Captioned by Petitioner	Date of Filing	Docket Numbers
AirVoice Wireless, LLC	AirVoice Wireless, LLC's Amended Compliance Plan	December 7, 2012	09-197; 11-42
AmeriMex Communications Corp.	AmeriMex Communications Corp. Revised Compliance Plan	December 6, 2012	09-197; 11-42
Blue Jay Wireless, LLC	Blue Jay Wireless, LLC Compliance Plan	December 19, 2012	09-197; 11-42
Millennium 2000 Inc.	Amended Compliance Plan of Millennium 2000 Inc.	December 18, 2012	09-197; 11-42
Nexus Communications, Inc.	Third Amended Compliance Plan of Nexus Communications, Inc.	December 6, 2012	09-197; 11-42
PlatinumTel Communications, LLC	PlatinumTel Communications LLC's Revised Compliance Plan	December 19, 2012	09-197; 11-42
Sage Telecom, Inc.	Revised Compliance Plan of Sage Telecom, Inc.	December 19, 2012	09-197; 11-42
Telrite Corporation	Telrite Corporation Compliance Plan	December 19, 2012	09-197; 11-42
Telscape Communications Inc. d/b/a Telscape Wireless	Revised Compliance Plan of Telscape Communications, Inc.	December 19, 2012	09-197; 11-42

Exhibit C

Notice to FCC Regarding SafetyNet Wireless Trade Name



Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, NW | Washington, DC 20037-1122 | tel 202.663.8000 | fax 202.663.8007

Glenn S. Richards
tel 202.663.8215
glenn.richards@pillsburylaw.com

June 19, 2013

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: **WC Docket Nos. 09-197 and 11-42**
AmeriMex Communications Corp. d/b/a SafetyNet Wireless

Dear Ms. Dortch:

AmeriMex Communications Corp. hereby notifies the Commission that it will be offering Lifeline services under the trade name SafetyNet Wireless. Please associate this correspondence with the approved AmeriMex Compliance Plan, see *Public Notice*, DA 12-2063 (rel. Dec. 26, 2012), and the pending petition for designation as a low-income eligible telecommunications carrier, filed February 22, 2013. See *Public Notice*, DA 13-361 (rel Mar. 7, 2013).

Please direct any communications regarding this matter to the undersigned.

Respectfully submitted,

/s/
Glenn S. Richards
*Counsel for AmeriMex
Communications Corp.*

Exhibit D

SafetyNet Wireless Officers and Biographical Information

List of SafetyNet Wireless Officers

Donald Aldridge, Chairman

Nick Metherd, COO

Stephen D. Klein, CEO

Jeffrey J. Matthews, CTO

RESUME

Donald L. Aldridge

WORK HISTORY

1998 – 2022: Founder and Chairman of AmeriMex Communications Corp. dba SafetyNet Wireless. AmeriMex is a Georgia licensed Competitive Local Exchange Carrier (CLEC) and also has a 214 license from the FCC. AmeriMex has been designated as an Eligible Telecommunications Carrier (ETC) by eight states and provides government subsidized wireless telephone service under the SafetyNet Wireless brand to low income residents within those states.

1993 – 1998: Partner with Tatum CFO Partners. Tatum provided financial advisory services to small and medium sized firms in the Southeastern USA.

1990 – 1993: CFO of Southern Services Inc. (SSI). SSI was an Atlanta based janitorial service company that primarily served high rise office towers in the metro Atlanta area.

1985 – 1990: Controller of Oxford Services Inc. Oxford provided janitorial and landscape services to clients throughout the Southeastern USA.

1983 – 1985: Controller of Prystup Packaging Products Inc.

1981 – 1983; Accountant with Deloitte & Touche, CPA Firm

EDUCATION

MBA – Virginia Tech 1981

B.S. Accounting – Bob Jones University 1980

Stephen D. Klein

Since May of 2013 Mr. Klein has been the CEO of SafetyNet Wireless, a wireless Eligible Telecommunications Carrier (ETC) in 10 states and an Affordable Broadband Provider (ACP) in 48 states. The company provides LifeLine wireless services and broadband service to low-income consumers who qualify for the programs.

In addition to being CEO of SafetyNet Wireless Mr. Klein is the CEO of Expert Communications Marketing, Inc. dba Expert Choice Marketing. Mr. Klein founded this company in 2007 which provided long distance and internet services to credit challenged consumers. Upon selling American Dial Tone (a CLEC) his primary business in 2009, Mr. Klein shifted the focus of Expert to become a marketing company specializing in offering telecommunications and energy services to low-income consumers.

Prior to Expert Choice Marketing, Mr. Klein was the founder and CEO of American Dial Tone from 1998 to 2009, a competitive local exchange carrier (CLEC) located in Tampa Bay FL, which provided local telephone service to the credit challenged market in multiple states. Under Steve's supervision American Dial Tone developed a superior back office, billing and ordering system which gave the company a competitive edge in the pre-paid CLEC industry. American Dial Tone was one of the first in their industry to electronically bond with Verizon and BellSouth. ADT enjoyed one of the lowest overhead costs per connected customer in the industry. ADT was proud of the fact that they had excellent relationships with the ILEC's and were current on all of their bills. ADT was the second ETC in the state of Florida and was proud to provide lifeline services in the state. Being one of the first ETC's in the industry ADT quickly noticed that there was potential for waste, fraud and abuse within the system. ADT developed its in house systems to prevent the company from giving service to customers who were not entitled to receive funds and to prevent claiming funds from the USAC that had already been collected from the ILEC.

Mr. Klein has been of the board of the National Lifeline Association (NaLA) since 2003 and had served as president for two years.

Prior to his founding American Dial Tone Mr. Klein was President and CEO of One Stop Auto Parts, Inc., a Florida based retail auto parts chain of 42 stores with a 50,000 S.F. distribution facility. The company had approximately 300 employees and 32 million in sales. Steve joined the company in 1981 with 3 stores and remained until 1998 playing a significant role in developing the organization. Prior to becoming President, he occupied positions in Merchandising, Management and Information Systems, Distribution and became the Chief Financial Officer.

Steve has a bachelor's degree in business from Michigan State University and has done post graduate and graduate work at Western Michigan University, Ohio State University and Tampa College.

He was a long-standing member of The Executive Committee (TEC) which is an International Organization of over 13,000 CEO's. TEC members meet once a month for a full day with a group of 10 to 15 CEOs from non-competing business industries to discuss business strategies, best practices, leadership styles, and other leadership training topics to enhance decision making

and business performance. Additionally, there is monthly one-to-one coaching with their Chair who offers executive insights, business advice, accountability, and effective leadership help and support. On average, TEC companies are better run and grow their revenues, at more than twice the percentage growth rate than non-TEC companies.

Mr. Klein, his wife Esther, and daughter Giulianna currently reside in Safety Harbor FL.

Jeffrey J. Matthews

Jeff joined AmeriMex Communications, Inc (dba SafetyNet Wireless) in May of 2013 and has been the Chief Technology Officer since 2021. SafetyNet Wireless is a wireless Eligible Telecommunications Carrier (ETC) in 10 states, providing wireless Lifeline services to over 200,000 eligible subscribers. SafetyNet Wireless also participates in the FCC's Affordable Connectivity Program, providing broadband service throughout the continental United States. Jeff is responsible for maintaining various systems used for onboarding, verifying, provisioning, storing, maintaining, and reporting of subscribers, inventory, vendors, and agents through multiple third-party providers.

Jeff has also been the Information Systems Director for Expert Communications Marketing, Inc. since its inception in 2007. Expert Communications is a marketing company focused on offering telecommunications and energy services to low-income consumers. Jeff is responsible for managing website, application, database, and provider interface development needed for obtaining, provisioning, and maintaining customers, as well as streamlining operations through advanced systems automation.

Jeff has been working in telecommunications for more than 20 years. Prior to working for Expert Communications Marketing, Jeff was the Information Systems Director for American Dial Tone, Inc. from 2003 until it was sold in 2009. American Dial Tone was founded in 1998 by Mr. Stephen Klein to provide pre-paid land-line telephone service to the credit challenged market. For two years prior to being hired full time at American Dial Tone, Jeff did work for American Dial Tone as an independent contractor, developing customer management software. As I.S. Director, Jeff was responsible for developing and automating customer service, marketing, provisioning, and billing systems. American Dial Tone was one of the first CLECs to start offering Lifeline service to qualified customers and was the second ETC designated in the state of Florida. Jeff is familiar with the issues related to providing Lifeline service and has been working for over 12 years developing procedures and systems to help identify qualified customers and eliminate fraudulent applicants.

Before starting full time with American Dial Tone, Jeff worked for 3 years as the I.S. Director for Nestor Sales, LLC, a national wholesale distributor of automotive and marine tools and supplies. Prior to Nestor Sales, Jeff was the Vice President of Information Systems for One Stop Auto Parts, Inc. One Stop Auto was a retail automotive parts chain of 42 stores based in Florida. Jeff worked under Mr. Stephen Klein at One Stop Auto and was with the company for 13 years.

Jeff is a 5-year member of the Vistage (formerly TEC) Key Executive Program. Jeff has lived in Florida all of his life, attended the University of Florida, and currently resides in Tarpon Springs, Florida with his wife Leanne and their 3 children.

Exhibit F

Copy of proposed advertising language and materials to advertise Lifeline

ENROLL IN LIFELINE - FAST AND EASY!

**FREE PHONE
TALK + TEXT + DATA**

www.safetynetwireless.com

This is a Lifeline service provided by SafetyNet Wireless. Lifeline is a federally funded government assistance program. Only qualified consumers with documentation proving eligibility may enroll. Lifeline services are nontransferable and limited to one benefit per household, consisting of either wireline or wireless. Willingly making false statements to obtain the benefit or receiving multiple Lifeline benefits can result in fines, imprisonment, de-enrollment or being barred from the program. You must use your phone to continue to receive service. After 30 days of non-usage you will be de-enrolled in the program.
\$0 Plan Offering: 1000 Talk / Unlimited Text / 25MB of Data. Pricing includes domestic calls only. Activation fees may apply. Please visit www.safetynetwireless.com/lifeline-plans-other-states/ for the most up-to-date plan offering.



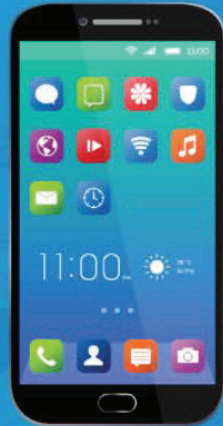
Notice to EBB Subscribers. The FCC is changing the name of the EBB Program to the Affordable Connectivity Program. [Click Here](#) for more information.

1-888-224-3213

[My Account](#) | [Renew My LifeLine](#)



[Home](#) [Plans](#) [How To Qualify](#) [Refills](#) [COVID-19](#) [About](#) [Contact Us](#)



FREE Phone + FREE Talk, Text, & Data* **EVERY** Month!

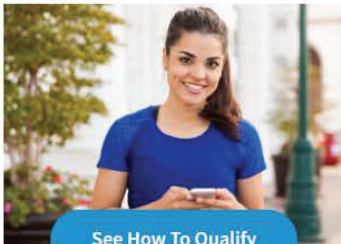
Please select your location to view
plans available in your area.

VIEW PLANS:

[California](#)

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*Free phone dependent on Qualifying California LifeLine service.
Cost of phone and service varies by state.



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[About SafetyNet](#)



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Exhibit G

Proposed Service Offering Including Description of Services, Lifeline Eligibility Requirements, Rates and Charges for Lifeline Service Offerings

The FCC's rules require a common carrier seeking ETC designation for Lifeline support to submit information describing the terms and conditions of the voice telephony plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges for toll calls (if any), and rates for each such plan.¹ At this time, SafetyNet Wireless plans to offer the following prepaid wireless Lifeline options.

Plan Description:	1000 voice minutes, unlimited SMS text messages, and 25MB data per month.
Local Calling Area:	National with no roaming fees
Undiscounted Monthly Charge:	\$15.25
Amount of Lifeline Discount:	\$5.25/month
Discounted Monthly Charge:	\$0.00
Activation Fee:	\$25
Plan Description:	350 voice minutes, unlimited SMS text messages, and 4.5 GB data per month.
Local Calling Area:	National with no roaming fees
Undiscounted Monthly Charge:	\$30.25
Amount of Lifeline Discount:	\$9.25/month
Discounted Monthly Charge:	\$15.00
Activation Fee:	\$25

All plans feature the following features: Voice Mail, Call Waiting, Caller ID, Call Forwarding, and Three-Way Calling.

These plans are available exclusively to Lifeline customers meeting all required eligibility requirements. Service will not be available to a potential Lifeline customer until all eligibility

¹ 47 C.F.R. § 54.202(a)(5).

requirements are satisfied as explained herein and in SafetyNet Wireless's FCC-approved Compliance Plan.

All available minutes are nationwide, and there are no additional charges for toll calling. With the exception of 911 and 611 calls, all calls utilize available minutes. Additional minutes are available for purchase at SafetyNet Wireless's third-party dealer retail locations, via customer service, and on its website. Customers will receive a text message warning that their monthly plan is nearing its end. Once the monthly airtime has expired, the customer will be able to finish its current call, but the next call attempted will be transferred to SafetyNet Wireless customer service for assistance. SafetyNet Wireless plans to implement additional balance expiration warnings in the upcoming months.

SafetyNet Wireless customers will be able to reach a live customer service representative by phone between the hours of 8:00am to 7:00pm Central, Monday through Friday. After these hours, the customer will receive a message informing it of SafetyNet Wireless's normal business hours and offering the customer the ability to utilize an automated payment system to add additional minutes, etc. If the customer does not choose to use the automated payment system, a recorded message will inform the customer to call back during normal business hours.

A Lifeline customer may gain access to a Spanish speaking representative through an automatic "press-off" (i.e., press 1 for Spanish). At this time, Spanish is the only alternative language available for customer service. Calls to customer service may be made by dialing "611" or customers may use the toll-free customer service number from any phone. Customers may also use "611" to make airtime balance inquiries, in addition to using SafetyNet Wireless's website

(www.SafetyNet Wirelesswireless.com) and the toll-free customer service number from any phone.

If Lifeline service is terminated for any reason (including non-usage), a reactivation fee of \$25.00 will apply if the Lifeline customer wants to reactivate and obtain the same telephone number it previously was assigned. The customer will have 30 days to reactivate under the same telephone number. If the Lifeline customer seeks to reactivate with a different telephone number, no reactivation fee will apply.

SafetyNet Wireless's planned prepaid wireless Lifeline service offerings are consistent with the federal Act's requirement that consumers have access to quality services at "just, reasonable, and affordable rates,"² and are consistent with the FCC's findings that Lifeline consumers should have the option to purchase bundled packages, additional calling features, and optional voice services.³

² 47 U.S.C. § 254(b)(1).

³ Lifeline Reform Order ¶ 317.