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August 13, 2024

VIA FEDERAL EXPRESS

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

REDACTED

RECEIVED-FPSC
2024 AUG 14 PM 4: 12
COMMISSION
CLERK

Re: 2024 Annual Lifeline Data Request (i-wireless, LLC)
CONFIDENTIAL TREATMENT REQUESTED

To Whom It May Concern:

i-wireless, LLC ("i-wireless") hereby files an original and two (2) redacted copies of its responses to the 2024 Annual Lifeline Data Request.

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

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. If you have any questions or need additional information, please do not hesitate to contact me at 770-232-9200 or etc@telecomcounsel.com. Thank you for your attention to this matter.

Respectfully submitted,

Rachael E. Sears

Rachael Sears
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys for i-wireless, LLC

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

2 redacted copies

2024 LIFELINE DATA REQUEST

To assist the Florida Public Service Commission in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **please provide responses to the following questions by August 13, 2024. Your responses should include your company name, contact person, and email address.**

Please answer the following questions as they relate to your company's Florida Lifeline customers, providing data for the reporting period of July 1, 2023, through June 30, 2024. For those questions requesting the data be reported monthly, provide the appropriate number as of the last day of each month during the review period.

1. Provide the number of residential access lines in service each month.

Response: See Confidential Exhibit A.

2. In accordance with Section 364.105, Florida Statutes, how many customers are receiving the Transitional Lifeline discount per month? How is this discount offered to them?

Response: i-wireless offers Transitional Lifeline service to former Lifeline customers upon their request, with 0 customers participating.

3. Provide the number of customers participating in Lifeline each month by service type (voice, broadband or bundled). Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision.

Response: See Confidential Exhibit A.

4. What plans are currently being offered to Lifeline customers for voice, broadband and/or bundled services? Please include any legacy plans for which customers are still subscribed to, but are no longer being offered to new customers.

Response: See Exhibit B.

5. Are you meeting the FCC's minimum service standards for both voice and broadband? If no, which service type meets the requirement?

Response: Yes, i-wireless meets the FCC's minimum service requirements.

6. Provide description of your company's procedures for Lifeline. Include the following in your response:

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

Response: See Confidential Exhibit C.

7. To the extent you have experienced an increase or decrease in Lifeline customers since the prior reporting period please describe what may have contributed to the change. Any additional general comments or information you believe will assist staff in evaluating and reporting Lifeline participation in Florida are welcome.

Response: i-wireless has seen a continued decline in Florida subscribers since December of 2016, primarily due to an intentional slowdown in acquisition of new customers and the issue with the FCC on the AT&T service area that has since been resolved towards the end of the reporting period. With the implementation of the FCC's 2016 Lifeline Modernization Order (FC 16-38), it is becoming increasingly difficult to profitably acquire Lifeline subscribers in a \$9.25 (subsidy) state.

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

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

9. In accordance with Florida administrative code 25-4.0665 (3), are you participating in the Lifeline Promotion Process (i.e. downloading qualified customer contact information from the FPSC)? If not, please explain.

Response: During most of the reporting period, the Company was not actively participating in the Florida Lifeline Promotion Process. The Company had been intentionally slowing the acquisition of new Lifeline customers in the state and had limited their outreach and advertising efforts due to the pending issue with the FCC on the AT&T service area. This issue has now been resolved, and the Company intends to participate in the future. Since the implementation of the program, a strong majority of the Company's customers in the state were already participating in the Lifeline Program.

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

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

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

Response: On May 7, 2024, i-wireless entered into a Consent Decree with the FCC in Docket DA-24-427.

EXHIBIT A
PUBLIC VERSION

	Total residential access lines in service	Total End of Period Lifeline customers	Voice Lifeline Customers	Broadband Lifeline Customers	Bundled Lifeline Customers
7 2023					
8 2023					
9 2023					
10 2023					
11 2023					
12 2023					
1 2024					
2 2024					
3 2024					
4 2024					
5 2024					
6 2024					

EXHIBIT B

	Lifeline Only
National Plan Voice Minutes (non-rollover)	1,000
Text	Unlimited
Data	4.5GB
Additional Airtime	Available with purchase of Top Up Card

Free SIM or Data-Capable Device	X
Local Calls	X
Nationwide Long Distance	X
Voicemail, Caller ID, Call Waiting	X
Free 911	X
Free 611	X
Balance Inquiries	X
Text Included	X
Data Allowance	X
Participation in Kroger Wireless	X

Retail Price	n/a
Federal Lifeline Subsidy	\$9.25
Federal ACP Subsidy	n/a
Lifeline Consumer Price	\$0

ACCESS WIRELESS TOP UP CARDS*

	Purchased Minutes	Text (SMS/MMS)	Data
\$5	250	Unlimited	500 MB
\$10	500	Unlimited	1 GB
\$15	1000	Unlimited	3 GB
\$25	Unlimited	Unlimited	5 GB
\$35	Unlimited	Unlimited	7 GB
\$50	Unlimited	Unlimited	10 GB
\$70	Unlimited	Unlimited	20 GB
\$110	Unlimited	Unlimited	50 GB

* Unused minutes, text and data expire 30 days from the date the funds were applied to the account.

For full Terms and Conditions, please see <https://www.accesswireless.com/support/terms-and-conditions>

EXHIBIT C
PUBLIC VERSION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. www.accesswireless.com/lifeline

[REDACTED]