



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Peter F. Kilmartin, Attorney General

November 23, 2011

Ms. Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

**Re: Telrite Corporation d/b/a Life Wireless – ETC Designation Petition,
Docket No. 4293**

Dear Ms. Massaro,

The Division of Public Utilities and Carriers (“Division”) submits the following comments related to the Application for Designation as an Eligible Telecommunications Carrier (“ETC”) of Telrite Corporation d/b/a Life Wireless (“Telrite”) dated October 12, 2011. The Division’s comments are based upon a review of the Commission’s Rules and Regulations Governing the Certification and Verification Procedures for Telecommunications Carriers Eligible to Receive Payments from the Federal Universal Service Fund and Certification and Verification Processes for Compliance with Providing Lifeline and Linkup Service (“Rules”), Telrite’s application, as well as a data response provided by Telrite to the Division.

When an entity applies for ETC status in Rhode Island the entity must demonstrate that its application satisfies the requirements of Section II(A) and Section III(a)-(c) of the Rules. In its application, Telrite represents that it satisfies each of the requirements designated in Section II(A). Telrite represents that its service affords users a dedicated message path for the length of a user’s particular transmission, and therefore, provides single-party service. Application at 8. Telrite also represents that by means of interconnection agreements which it maintains with local exchange carriers, its customers will be able to make and receive calls on the public switched telephone network with a minimum bandwidth of 300 to 3,000 Hertz thereby providing customers with voice grade access to the public switched network. Application at 7. Telrite states that it “currently uses out-of-band digital signaling and in-band multi-frequency signaling” that is the “functional equivalent” to dual tone multi-frequency signaling. Application at 8. Through the proposed offering of Telrite, customers may access emergency services (such as 9-1-1 and E 9-1-1), as well as operator services for billing questions (by dialing 6-1-1) and call completion (by dialing 4-1-1). Application at 8-9. All subscribers, Telrite represents, will have the ability to make and receive interexchange service, *i.e.*, long distance telephone calls, and, upon request access to information contained in directory listings (by dialing 4-1-1). Application

at 9. Telrite represents that it satisfies the Toll Limitation requirement because it provides a “prepaid service.” Application at 9. Telrite satisfies the final requirement of Section II(A), representing that it will “provide qualified Lifeline customers who reside in the State of Rhode Island with 68 minutes of free anytime local and long distance minutes each month” and will use “Link-Up support to reduce the company’s ‘customary charge for commencing service’ by ‘half of the customer charge.’” Application at 5-6.

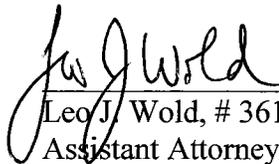
Pursuant to Part III(a)-(c) of the Rules, an ETC applicant is also required to demonstrate that it is an authorized telecommunications carrier under the laws of the State of Rhode Island, provides all federally-required and state-required services throughout its service area, advertises them in media of general circulation and will offer Lifeline and Linkup services that fully comply with federal and state requirements. Telrite is currently licensed as both a CLEC and Interexchange carrier in Rhode Island. Application at 2. Telrite has also declared under pain and penalty of perjury that it will provide all federally-required and state required services throughout Rhode Island, Application at 21, and will advertise them in media of general circulation. Application at 21.

In reviewing Telrite’s application in connection with this last requirement, the Division was unclear as to whether Telrite intended to exclude three of four wireless calling plans from its proposed Lifeline offering in Rhode Island. As a result, on November 14, 2011, the Division forwarded a data request to Telrite to clarify this issue. A copy of the Division’s data request is attached hereto and marked “Exhibit A.” Telrite responded to the Division’s data request on November 22, 2011. A copy of Telrite’s response is attached hereto and marked “Exhibit B.” In its response, Telrite represents that it will, in fact, offer three of the four wireless calling plans (68, 125, and 250 Free Minute Plans) reflected in the advertisement contained in its application, as well as a fourth plan which includes “unlimited talk and text messages at the monthly rate of \$42.95.” Data Response of Telrite to First Data Request at 1. With that clarification and Telrite’s representation that it will offer Lifeline services that fully comply with federal and state requirements, Application at 21, the Division is satisfied that the application satisfies Part III(a)-(c) as well.

Based upon the representations contained in Telrite’s application and Telrite’s response to a Division data request, the Division recommends that the Commission approve Telrite’s Application for Designation as an ETC dated October 12, 2011.

Respectfully submitted,

Division of Public Utilities and Carriers



Leo J. Wold, # 3613
Assistant Attorney General

cc: Service List

available to other carriers. The nature by which Lifeline support is provided to wireless carriers also obviates any concerns that multiple ETC designations in Rhode Island would have a negative impact on the USF. Lifeline support is provided on a customer-specific basis, and only after a carrier has acquired and begun to serve an eligible customer does the carrier receive Lifeline support for that customer. By tying support to actual service of a customer, moreover, the Lifeline program ensures that USF support only funds the carrier that actually "wins" the customer's service.

C. Telrite Lifeline Offering

Under Telrite's wireless Lifeline plan, a copy of which is attached as Exhibit D, Telrite will provide qualified Lifeline customers who reside in the State of Rhode Island with sixty-eight (68) minutes of free anytime local and long distance minutes each month and will use all low-income universal service support to allow the Company to provide the service with no monthly recurring charge, thus ensuring that the consumer receives 100% of all universal service support funding for which the Company will seek reimbursement. A Lifeline customer may opt to increase available minutes in any month by purchasing additional time at \$0.099 per minute. Several unlimited talk and text options are also available, but there is no obligation that customers purchase these additional offerings or add money to their accounts.

To ensure that customers receive uninterrupted access to 9-1-1 emergency and customer care services, Lifeline customers will be able to access 9-1-1 emergency and customer care services regardless of whether they have any remaining minutes in their account. In addition, minutes used for calls placed to 9-1-1 emergency services and Telrite customer cares are not decremented from a customer's account. As a result, Lifeline customers will receive free service so long as they do not elect to exceed 68 minutes of voice service per month with no additional charges for taxes or activation.

Life

WIRELESS

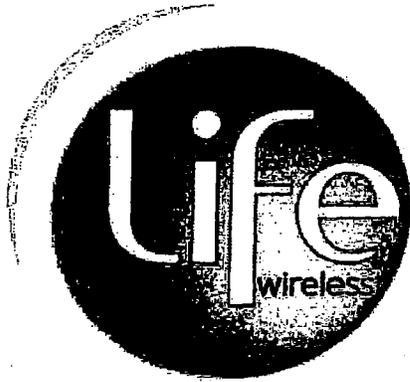
LIFE WIRELESS

LIFE WIRELESS is a government supported program that provides a free cell phone, activation, and monthly minutes to LinkUp & LifeLine eligible customers. Contact us to see if you are eligible today!

- FREE ACTIVATION!
- FREE PHONE!
- FREE MONTHLY MINUTES!
- NO ROAMING!
- FREE LONG DISTANCE!
- REFILL WITH OUR OTHER GREAT CALLING PLANS!
- NATIONWIDE GSM COVERAGE!
- FREE VOICE MAIL
- FREE CALLER ID
- FREE CALL WAITING
- 911 ACCESS



CUSTOMER SERVICE— 1-888-543-3620
ACTIVATION LINE— 888-543-3640
customerservice@lifewireless.com
support@lifewireless.com



LIFE WIRELESS is a government supported service that provides **FREE** cellular service, a **FREE** cell phone, and **FREE** monthly minutes to LinkUp & LifeLine eligible customers.

QUALIFYING GOVERNMENT PROGRAMS:

- Federal Public Housing Assistance or Section 8
- Supplemental Nutrition Assistance Program formerly known as Food Stamps
- Low Income Home Energy Assistance Program
- Medicaid
- National School Lunch Program's free lunch program
- Supplemental Security Income
- Temporary Assistance for Needy Families

LIFE WIRELESS CALLING PLANS

<u>PLAN 1</u>	<u>PLAN 2</u>	<u>PLAN 3</u>	<u>PLAN 4</u>
<ul style="list-style-type: none"> • 68 Free Minutes • 3 Days Unlimited Talk & Text Per Month • .50 (1/2) Minutes Per Text • Rollover 	<ul style="list-style-type: none"> • 125 Free Minutes • 1 Minute Per Text • Rollover 	<ul style="list-style-type: none"> • 250 Free Minutes • 1 Minute Per Text • No Rollover 	<ul style="list-style-type: none"> • Unlimited Talk and Text for 1 month • \$29.45 • No Rollover

*SMS Messages deduct from your Free Minute Balance.

<p>CUSTOMER SERVICE — 1-888-543-3620 www.lifewireless.com EMAIL- info@lifewireless.com</p>	<p>Questions or Concerns? Questions or concerns regarding Lifeline and/or Link-Up or any service issues in the State of Georgia should be directed to the Georgia Public Service Commission Consumer Affairs Division by calling 404-656-4501 or toll free 800-282-5813.</p>
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Kathleen Dandeneau Dias, Paralegal
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E-mail: kdias@rhbgllaw.com

November 22, 2011

Via E-mail and Regular Mail

Luly E. Massaro, Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

***Re: Petition for Designation as an Eligible Telecommunications Carrier by
Telrite Corporation d/b/a Life Wireless***

Dear Ms. Massaro:

This office represents Telrite Corporation d/b/a Life Wireless. Pursuant to our telephone conversation this morning, enclosed for filing please find an original and nine copies of Telrite's Data Response to First Data Request in regards to the above referenced matter.

Copies have also been e-mailed to those on the service list.

Please do not hesitate to contact us should you have any questions.

Very truly yours,


Kathleen Dandeneau Dias, Paralegal
To J. Richard Ratcliffe, Esq.

KDD/kdd

CC: All on Designated Service List (via E-mail)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

In the Matter of

Petition of Telrite Corporation d/b/a Life Wireless
For Designation as an Eligible Telecommunications
Carrier in the State of Rhode Island for the Limited
Purpose of Offering Wireless Lifeline and Link Up
Service To Qualifying Households

Docket No. 4293

DATA RESPONSE OF TELRITE TO FIRST DATA REQUEST

In response to the First Data Request filed by Leo J. Wold, Esq. of the Rhode Island Department of Attorney General, Telrite responds as follows:

In addition to the Lifeline Offering described at page 5 of its filing, Telrite will offer the following three Lifeline plans:

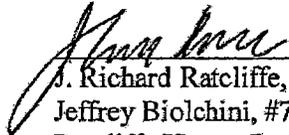
- (1) Telrite will provide qualified Lifeline customers who reside in the State of Rhode Island with 125 minutes of a free anytime local and long distance minutes each month. Customers may also send and receive text messages which will be charged at one minute per text.¹ Unused minutes may be rolled over;
- (2) Telrite will provide qualified Lifeline customers who reside in the State of Rhode Island with 250 minutes of a free anytime local and long distance minutes each month. Customers may also send and receive text messages which will be charged at one minute per text. Unused minutes may be not be rolled over;
- (3) Telrite will offer qualified Lifeline customers who reside in the State of Rhode Island a Plan that includes unlimited talk and text messages at a monthly a rate of \$42.95. There are no rollover allowances with this plan.

A synopsis of the all four of Lifeline plans, as well as sample advertising is attached hereto as Appendix A.

¹ The Lifeline offering described on page 5 of Telrite's filing also permits customers may also send and receive text messages which will be charged at one half minute per text. Unused minutes may be rolled over.

Dated: November 22, 2011

Telrite Corporation
By its attorneys

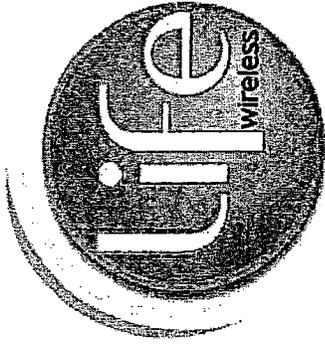


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Tel: (401) 331-3400
Fax: (401) 331-3440

**Docket 4293 – Telrite Corp. d/b/a Life Wireless - ETC Designation Petition
Service List as of 11/10/11**

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	mkimmell@rhbglaw.com	
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	bkent@ripuc.state.ri.us	
	mcorey@riag.ri.gov	
File an original & nine (9) copies w/ Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Lmassaro@puc.state.ri.us	401-780-2107 401-941-1691
	Cwilson@puc.state.ri.us	

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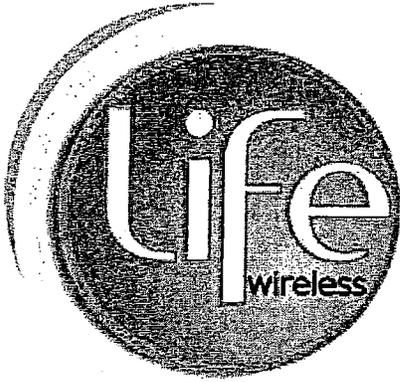


Rhode Island - Available Life Wireless calling plans:

PLANS	NON-RECURRING ACTIVATION FEE	MONTHLY FEE	MINUTES	TEXT RATE	ROLLOVER
LifeLine eligible	\$0.00	\$0.00	68	.50 (1/2) MINUTES PER TEXT	YES
Non-LifeLine eligible	\$60.00	\$13.50	68	.50 (1/2) MINUTES PER TEXT	YES
LifeLine eligible	\$0.00	\$0.00	125	1 MINUTE PER TEXT	YES
Non-LifeLine eligible	\$60.00	\$13.50	125	1 MINUTE PER TEXT	YES
LifeLine eligible	\$0.00	\$0.00	250	1 MINUTE PER TEXT	NO
Non-LifeLine eligible	\$60.00	\$13.50	250	1 MINUTE PER TEXT	NO

Available Life Wireless recharge/refill plans:

Retail Price	Minutes	Rate Per Minute	Text Rate
\$10 Refill	101 Anytime Minutes	\$0.089	\$0.05
\$25 Refill	252 Anytime Minutes	\$0.089	\$0.05
\$7.95	Unlimited Talk & Text 3-DAY	Unlimited	Unlimited
\$12.95	Unlimited Talk & Text 7-DAY	Unlimited	Unlimited
\$21.49	Unlimited Talk & Text 14-DAY	Unlimited	Unlimited
\$42.95 Refill	Unlimited Talk & Text 30-DAY	Unlimited	Unlimited



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- Federal Public Housing Assistance or Section 8
- Supplemental Nutrition Assistance Program formerly known as Food Stamps
- Low Income Home Energy Assistance Program
- Medicaid
- National School Lunch Program's free lunch program
- Supplemental Security Income
- Temporary Assistance for Needy Families

LIFE WIRELESS CALLING PLANS

PLAN 1

- 68 Free Minutes
- .50 (1/2) Minutes Per Text
- Rollover

PLAN 2

- 125 Free Minutes
- 1 Minute Per Text
- Rollover

PLAN 3

- 250 Free Minutes
- 1 Minute Per Text
- No Rollover

CUSTOMER SERVICE — 1-888-543-3620

www.lifewireless.com

EMAIL- info@lifewireless.com

