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September 30, 2013

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

Re: Global Connection Inc. of America dba STAND UP WIRELESS

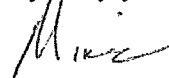
Dear Luly:

This office is local counsel to Global Connection Inc. of America dba STAND UP WIRELESS, together with its regulatory counsel Lance J.M. Steinhart.

Enclosed for filing is an original and nine copies of the Application for Designation as an Eligible Telecommunications Carrier in the State of Rhode Island, together with various exhibits.

Please docket this matter and contact me if you have any questions or need any further information.

Very truly yours,



Michael R. McElroy

MRMc:tmg

cc: Lance J.M. Steinhart, Esq.

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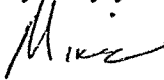
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**BEFORE THE
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of)
Global Connection Inc. of America dba)
STAND UP WIRELESS for Designation)
as an Eligible Telecommunications Carrier)
in the State of Rhode Island)

Docket No. _____

**APPLICATION OF GLOBAL CONNECTION INC. OF AMERICA
DBA STAND UP WIRELESS FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF RHODE ISLAND**

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September 24, 2013

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**BEFORE THE
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**APPLICATION OF GLOBAL CONNECTION INC. OF AMERICA
DBA STAND UP WIRELESS FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF RHODE ISLAND**

I. INTRODUCTION

Global Connection Inc. of America dba STAND UP WIRELESS (“Stand Up Wireless” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the Rhode Island and Providence Plantations Public Utility Commission’s (“Commission”) Eligible Telecommunications Carrier (“ETC”) Rules,³ hereby submits this Application for Designation as an ETC in the State of Rhode Island. Stand Up Wireless seeks ETC designation solely to provide Lifeline to qualifying Rhode Island households; it will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ See Rules and Regulations Governing the Certification and Verification Procedures for Telecommunications Carriers Eligible to Receive Payment from the Federal Universal Service Fund, effective August 30, 2012 (the “Commission’s ETC Rules”). The Company does not seek ETC designation for purposes of participating in the Link-Up program.

providing service to high cost areas.⁴ As demonstrated herein, and as certified in Exhibit 1 to this Application, Stand Up Wireless meets all the statutory and regulatory requirements for designation as an ETC in the State of Rhode Island, including the Commission's ETC Rules and the new requirements outlined in the FCC's *Lifeline and Link Up Reform Order*.⁵ Rapid grant of Stand Up Wireless' request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline service to low-income Rhode Island residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application for ETC designation.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to Applicant's local counsel:

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⁴ Given that Stand Up Wireless only seeks 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 Stand Up Wireless.

⁵ *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*").

II. STAND UP WIRELESS' UNIVERSAL SERVICE OFFERING

A. Company Overview

Global Connection Inc. of America (“Global Connection”) is a Georgia Corporation.⁶ Its principal office is located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global Connection provides local exchange telecommunications services throughout the United States and is designated as an ETC on a wireline basis in Alabama, Arkansas, Georgia, Louisiana, Michigan, and North Carolina. Global Connection provides commercial mobile radio service (“CMRS”) throughout the United States under its d/b/a, Stand Up Wireless, and concurrent with this Application is registering as a Telecommunications Service Provider (Class VI) in Rhode Island. Stand Up Wireless provides prepaid wireless telecommunications services to consumers by using the Sprint PCS and Verizon Wireless (“Sprint/Verizon”) networks on a wholesale basis. Stand Up Wireless obtains from Sprint/Verizon, via an agreement with Boomerang Wireless, LLC d/b/a Ready Mobile (“Ready Mobile”), the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”). Stand Up Wireless has been designated as an ETC in Arkansas, Arizona, Georgia, Iowa, Kansas, Louisiana, Maryland, Massachusetts, Michigan, Missouri, Nebraska, Ohio, Pennsylvania, Puerto Rico, South Carolina, Texas, Wisconsin and West Virginia and currently has applications for ETC designation pending with California, Illinois, Kentucky, Minnesota, New Jersey, Washington and the FCC; no such petitions have been denied.

Stand Up Wireless’ prepaid wireless services that are affordable and easy to use are attractive to low-income and lower-volume consumers, providing them with access to emergency

⁶ Global Connection was incorporated in the State of Georgia on June 1, 1998 and registered with the Kentucky Secretary of State on June 11, 2008. Global Connection Inc. of America’s corporate and trade names, identifiers, and its holding company, operating companies and affiliates are: Stand Up Wireless (dba), and Global Connection Holdings Corporation (holding company).

services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. Stand Up Wireless will offer consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Given its pricing and marketing strategy and the demographics of other, similar MVNOs' customers, Stand Up Wireless anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. Stand Up Wireless will not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, Stand Up Wireless will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

B. Proposed Lifeline Offering

Stand Up Wireless has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Rhode Island. Stand Up Wireless intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice usage at all price points.

The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other Stand Up Wireless prepaid customers, with one notable exception: prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, Stand Up Wireless will receive support from the Lifeline program as compensation for providing those services. Stand Up Wireless' free Lifeline plan (StandUp 100)

includes separate pools of both voice minutes and text minutes. Competing Lifeline wireless providers typically deplete voice minutes when text is used, reducing the available voice minutes available to customers and thereby reducing the provider's per customer cost because text messaging costs are typically much lower than voice minute costs. According to Pew Research Center, in May 2010, seventy-two percent (72%) of adults reported sending or receiving a text message.⁷ Since text messages draw from their own pool, Stand Up does not deplete the pool of voice minutes available for use of text messages and vice versa. Separate pools for both voice minutes and text messages are in the consumers' best interest as it preserves critical voice minutes for consumers who utilize text messaging.

Under the Company's Wireless Lifeline Plan, Stand Up Wireless customers will have several options to choose from. In addition to StandUp 100, customers will also be permitted to select one of Stand Up Wireless' alternative plans, which offer customers the opportunity to receive more text units and voice units. Such alternative plans will be offered to Lifeline customers at a subsidized rate. Where Stand Up Wireless customers select an alternative plan, Stand Up Wireless will apply a discount of \$12.75 per month, including the maximum federal Lifeline subsidy (currently \$9.25), to the retail rate of the alternative plan. Competing Lifeline wireless providers typically offer only a base package with required retail top up to add more voice minutes and/or texts. The initial plans offered by Stand Up Wireless are as follows:

StandUp 100. Stand Up Wireless will provide qualified Lifeline customers with a monthly allotment of 100 free anytime local and long distance minutes and 100 free SMS text messages, and all applicable taxes and fees will be included. Thus, Stand Up Wireless will use all Lifeline support to allow the Company to provide the service with no monthly recurring

⁷ Amanda Lenhart, *Adults, Cell Phones and Texting*, Pew Research Center Publications, September 2, 2010.

charge, ensuring that the consumer receives 100% of all universal service support funding for which the Company will seek reimbursement. Unused minutes and unused SMS text messages will rollover from month to month.

StandUp 250. Stand Up Wireless will provide qualified Lifeline customers with a monthly allotment of 250 free anytime local and long distance minutes, and all applicable taxes and fees will be included. Unused minutes do not rollover from month to month.

StandUp 500. Stand Up Wireless expects to provide qualified Lifeline customers with a monthly allotment of 500 anytime local and long distance minutes and 500 SMS text messages at a cost of \$14.95 per month, excluding applicable taxes and fees. Unused minutes and unused SMS text messages do not rollover from month to month in this plan.

StandUp 1000. Stand Up Wireless expects to provide qualified Lifeline customers with a monthly allotment of 1000 anytime local and long distance minutes and 1000 SMS text messages at a cost of \$29.95 per month, excluding applicable taxes and fees. Unused minutes and unused SMS text messages do not rollover from month to month in this plan.

StandUp Unlimited. Stand Up Wireless expects to provide qualified Lifeline customers with unlimited voice minutes and 1000 SMS text messages for \$34.95 per month, excluding applicable taxes and fees. Unused minutes and unused SMS text messages do not rollover from month to month in this plan.

New Stand Up Wireless customers must choose a plan upon enrollment. If the customer selects a non-FREE plan, payment must be made directly to Stand Up Wireless or one of its designated payment agent locations prior to activation of service. Existing Stand Up Wireless customers who wish to switch plans may do so at www.StandUpWireless.com or by calling a toll free number. Stand Up Wireless customers who select one of the three (3) non-FREE plans must

make payment for their upcoming service period five (5) days prior service period end date. Customers who fail to make payment prior to the deadline will be automatically changed to the free StandUp 100 plan with 100 free airtime minutes and 100 free SMS text messages for the subsequent service period.

Calls made to Stand Up Wireless customer service made by customers via their Stand Up Wireless handset will not deplete the customer's available airtime. Stand Up customers can contact Stand Up Wireless customer service by dialing a short code (e.g. *611) from their Stand Up Wireless phone to address billing, service and general account issues with all voice minutes used in association with such calls being credited to the customer's account. Customers whose balance of voice minutes has been exhausted will still be able to make outbound calls to Stand Up Wireless customer service as long as their service is active. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

In the event that all airtime subscribed to has been used, Lifeline customers will have the ability to purchase additional time. At this time additional credits may be purchased at the rate of \$5.00 for 40 credits; \$10.00 for 100 credit; \$20.00 for 250 credits, \$30.00 for 500 credits; and \$50.00 for 1000 credits by calling our toll free number or at www.StandUpWireless.com. Credits may also be purchased at any authorized Stand Up Wireless payment center. Each credit provides one (1) minute of airtime or one (1) SMS text message.

All Lifeline plans will also include a free handset and the following Custom Calling features at no charge:

- (1) Caller ID;
- (2) Call Waiting;
- (3) 3-Way Calling
- (4) Voicemail.

Upon certification of the customer for Lifeline, wireless handsets will be delivered, at no charge, and the requisite number of minutes will be added upon service activation. Stand Up Wireless will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service.

Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline offering.⁸ As Exhibit 2 demonstrates, the Company's Lifeline offerings will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of eligible customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without a the burden of credit checks or service contracts. Stand Up Wireless' prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

C. Plan Enrollment

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Customers may then request that a certification form be mailed to them, or they can download a form from the internet or retrieve a form in person at a Company event. The certification form, a sample of which is attached hereto as Exhibit 3 in accordance with the Commission's ETC Rules, will explain in clear, easily understandable language that:

⁸ The Company's Lifeline terms and conditions can be found at www.StandUpWireless.com.

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the FCC's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

The Company's certification form will also require all consumers, at sign up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by revised CFR § 54.410(d).⁹ See Exhibit 4 for more detailed enrollment information. Stand Up Wireless will annually re-certify the continued eligibility of all of its subscribers.

D. Prevention of Waste, Fraud and Abuse

Stand Up Wireless recognizes the importance of safeguarding the USF. Therefore, the Company has implemented the following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of the program. After 60 days of nonuse, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.¹⁰ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.¹¹ If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber.

⁹ See *Lifeline and Link Up Reform Order* page 227-29.

¹⁰ See *Lifeline and Link Up Reform Order* at ¶ 257.

¹¹ See *Lifeline and Link Up Reform Order* at ¶ 261.

To further protect the integrity of the USF, Stand Up Wireless has contracted with: CGM, LLC of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, Stand Up Wireless ensures that it does not over-request from support funds.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the "primary responsibility" for the designation of ETCs.¹² Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.¹³ Therefore, the Commission has the authority to designate Stand Up Wireless as an ETC. Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier.¹⁴

¹² 47 U.S.C. § 214(e)(2).

¹³ *USF Order*, at 8858-59, ¶ 145.

¹⁴ See *In re: Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Rhode Island for the limited purpose of Offering Lifeline Service to Qualified Households*, Docket No. 4153, Order No. 20134 (September 14, 2010) ("*TracFone ETC Order*"); see also *In re: Petition of Nexus Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Rhode Island for the Limited Purpose of Offering Lifeline Service to Qualified Households*, Docket No. 4238, Order No. 20440 (July 26, 2011) ("*Nexus ETC Order*");

Under the Act, a state public utility 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). Stand Up 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 Rules (47 C.F.R. § 54.201(i)) 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 recently granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.¹⁵ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: "[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section." As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore may not apply the facilities-based requirement to Stand Up Wireless. Therefore, the Commission has the authority to act under Section 214(e)(2) of the Act to grant Stand Up Wireless' request for designation as an ETC throughout the State of Rhode Island.

A. The ETC Designation Request is Consistent With Recent Commission Precedent

Stand Up Wireless' request for ETC designation to participate in the Lifeline program is consistent with the Commission's designation of TracFone and Nexus as ETCs.¹⁶ In its decision, the Commission determined that TracFone and Nexus satisfied all of the necessary eligibility requirements and that designation of a prepaid wireless provider as an ETC would serve the public interest. Stand Up Wireless requests that the Commission expeditiously process its ETC

¹⁵ See *Lifeline and Link Up Reform Order* at ¶ 368.

¹⁶ See *TracFone ETC Order*; see also *Nexus ETC Order*.

Application so that it can quickly commence providing qualifying low-income Rhode Island customers with affordable USF-supported wireless services during these challenging economic times for all state residents. Designation of Stand Up 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. STAND UP WIRELESS SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

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.¹⁷ 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 the FCC has forborne from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.¹⁸ As detailed below, Stand Up Wireless satisfies each of the above-listed requirements, as well as the Commission’s ETC Rules.

¹⁷ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“*USF Order*”).

¹⁸ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

A. Stand Up 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 Stand Up Wireless. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the "own-facilities" requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹⁹

(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."

Stand Up Wireless will avail itself of the FCC's grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, Stand Up Wireless filed its Compliance Plan which the FCC approved on May 25, 2012. A copy of its approved Compliance Plan is attached hereto as Exhibit 4. Stand Up Wireless commits to providing Lifeline service in Rhode Island in accordance with the Compliance Plan.

B. Stand Up Wireless Is a Common Carrier

CMRS providers like Stand Up Wireless are treated as common carriers.²⁰

¹⁹ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

²⁰ *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*

C. Stand Up Wireless Will Provide All Required Supported Services

Through its wholesale arrangements with Sprint/Verizon, Stand Up Wireless is able to provide all of the services designated for support by Section 54.101(a) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a)), and the Commission's ETC Rules, including the following:

1. Voice Grade Access to the Public Switched Telephone Network

Stand Up Wireless provides voice grade access to the public switched telephone network ("PSTN").

2. Minutes of Use for Local Service

As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. The FCC has not specified a minimum amount of local usage that an ETC must offer.²¹ Stand Up Wireless offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

3. Access to Emergency Services

Stand Up 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. Stand Up Wireless also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

4. Toll Limitation for Qualified Low-Income Customers

In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no

Report and Order] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services and resellers of such services.").

²¹ See e.g., *In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision 15 FCC Red 7331 (2002).

longer be deemed a supported service.²² “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.”²³ Nonetheless, Stand Up Wireless’ offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. Stand Up Wireless’ service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same. Stand Up Wireless will not seek reimbursement for toll limitation service.

5. Other Services

While no longer required by 47 C.F.R. § 54.101(a), Stand Up Wireless provides dual tone multi-frequency (“DTMF”) signaling to expedite the transmission of call set up and call detail information throughout the network, single party service for the duration of each telephone call and not multi-party (or “party-line”) services, access to operator services, the ability to make interexchange, or long distance, telephone calls, and access to directory assistance services by dialing “411” from the provided wireless handsets.

D. Stand Up Wireless Will Advertise the Availability of Supported Services

Stand Up 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). Stand Up Wireless’ advertising will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*, as outlined in the Company’s Compliance Plan.²⁴ 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 mass media, outreach events, and community and charitable

²² See *Lifeline and Link Up Reform Order* at ¶ 367.

²³ See *Lifeline and Link Up Reform Order* at ¶ 49.

²⁴ See Exhibit 4, section I.F. See also *Lifeline and Link Up Reform Order* at Section VII.F.

involvement.²⁵ These advertising campaigns will be specifically targeted to reach low-income customers and promote the availability of cost-effective wireless services to this neglected consumer segment. Stand Up Wireless may also promote the availability of its Lifeline and 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.

In addition, Stand Up Wireless will utilize its network of retail partners to help promote the availability of its Lifeline plan, especially those retail outlets that are frequented by low income consumers; examples include all Western Union and MoneyGram locations, independent operators including insurance providers, check cashing locations and select discount retailers. Stand Up Wireless will provide retail vendors with signage to be displayed where Company products are sold, and with printed materials describing the Company's Lifeline program. The Company expects to be able to inform consumers of the availability of Lifeline service in a manner that will result in higher participation by qualified consumers than has been the case in the past. Statistics suggest that there are many eligible customers who are not yet aware of the programs. According to the best data available to the Company, as of December 31, 2011, only between 20-50% of consumers eligible for Lifeline Services in the State of Rhode Island were being provided such services.²⁶ Stand Up Wireless believes that its advertising and outreach efforts detailed above will result in increased participation in the Lifeline program.

²⁵ In accordance with the Commission's ETC Rules, see Exhibit B of attached Exhibit 4 for a sample advertisement.

²⁶ See attached Exhibit 5, 2011 Lifeline Participation Rates by State, which was obtained from USAC, an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC. USAC administers USF programs for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries.

E. Stand Up Wireless Requests Designation Throughout Its Service Area in Rhode Island

Stand Up Wireless is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, the Company is required to describe the geographic area(s) within which it requests designation as an ETC. Stand Up Wireless requests ETC designation for its entire service area in Rhode Island.²⁷ Stand Up Wireless understands that its service area may overlap with rural carriers in Rhode Island, 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. It does not seek and will not accept Link-Up or high cost support.

F. Service Commitment Throughout the Proposed Designated Service Area

Stand Up Wireless provides service in Rhode Island by reselling service which it obtains from its underlying facilities-based provider. The provider's network is operational and largely built out. Thus, Stand Up Wireless will be able to commence offering its Lifeline service to all locations served by its underlying carrier very soon after receiving approval from the Commission. Stand Up Wireless commits to comply with the service requirements applicable to the support that it receives.²⁸

G. Network Improvement Plan

As set forth in the *Lifeline and Link Up Reform Order*, a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement

²⁷ See attached Exhibit 6 for a list of wire centers in which the Company requests ETC Designation.

²⁸ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a)(1)(i).

plan as part of its application for designation as an ETC.²⁹

H. Ability to Remain Functional in Emergency Situations

In accordance with 47 CFR §54.202(a)(2), Stand Up Wireless, through its underlying carrier, has the ability to remain functional in emergency situations. Stand Up Wireless' agreement with Sprint/Verizon allows the Company to provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. As a Tier I carrier, Sprint/Verizon has redundancies, back-up generator power and an extensive disaster recovery program.

I. 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 standards.³⁰ The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Stand Up Wireless commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

J. Local Usage Requirement

An applicant for ETC designation is no longer required to demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.³¹ Nevertheless, not only will Stand Up Wireless' offering be comparable to the

²⁹ See *Lifeline and Link Up Reform Order* at ¶ 386.

³⁰ See 47 C.F.R. § 54.202(a)(3).

³¹ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

underlying ILEC plans, but it also will exceed them in several respects. Stand Up Wireless will offer customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, Stand Up Wireless customers can use these free minutes to place calls statewide (and even nationwide) because Stand Up Wireless does not constrict customers' use by imposing a local calling area requirement. Stand Up Wireless will also provide Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call waiting services at no cost. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

K. Equal Access Requirement

The FCC's Rules no longer require an applicant for ETC status to provide a certification that it acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.³²

L. Stand Up Wireless is Financially and Technically Capable

Stand Up Wireless is financially and technically capable of providing Lifeline-supported services.³³ Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services and has access to capital from its investors. The majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Consequently, Global Connection has not relied, and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any

³² See *id.*

³³ See *Lifeline and Link Up Reform Order* at ¶ 387.

state. Furthermore, the senior management of Stand Up Wireless has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.³⁴ Stand Up Wireless will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

M. Stand Up Wireless Will Comply with Certification and Verification Requirements

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Stand Up Wireless will certify and verify consumer eligibility in accordance with the FCC's requirements, with Sections 6 and 7 of the Commission's ETC Rules, and in accordance with its Compliance Plan, which outlines how the Company will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*. In particular, the Company will work with the Department of Human Services ("DHS") to certify initial subscriber eligibility for the Lifeline program and to annually verify continued eligibility for the Lifeline program. The Company understands that it may rely upon certification from DHS that a subscriber is still enrolled in a Qualifying Assistance Program to meet the requirements of 47 C.F.R. § 54.541(f), annual recertification. See Exhibit 4, the Company's FCC Compliance Plan, at Section I.D for further information on the Company's annual recertification procedures.

N. Stand Up Wireless Will Comply With All Regulations Imposed By The Commission

By this Application, Stand Up Wireless hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the

³⁴ See Exhibit 7 for key management bios.

Company's provision of service contemplated by this Application. Upon Commission request, the Company is prepared to answer questions or present additional testimony or other evidence about its services within the state. Where and when applicable, the Company will collect and remit the applicable 911 surcharge on behalf of its customers to the Division of Taxation. The Company will comply with the annual reporting requirements outlined in Section 8 of the Commission's ETC Rules.

V. DESIGNATION OF STAND UP WIRELESS 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.³⁵ Designation of Stand Up Wireless as an ETC in Rhode Island will further the public interest by providing Rhode Island consumers, especially low-income consumers, with low prices and high quality services. Many low-income customers in Rhode Island 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 Stand Up Wireless as an ETC would significantly benefit low-income consumers eligible for Lifeline service in the State of Rhode Island—the intended beneficiaries of universal service.

³⁵ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

A. Advantages of Stand Up Wireless' Service Offering

The public interest benefits of the Company's wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience 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 to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 911 service and, where available, E911 service in accordance with current FCC requirements. The Company's Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. Stand Up Wireless' Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks or contracts.

Stand Up Wireless' Lifeline program will provide low-income Rhode Island residents with the convenience and security offered by wireless services—even if their financial position deteriorates. According to the U.S. Department of Labor Bureau, Rhode Island's unemployment rate was 10.2% as of December 2012. The economic circumstances indicate that low-income individuals, now more than ever, can greatly benefit from the advantages offered by the Company's Lifeline service, thus allowing those adversely impacted by the failing economy or job loss to have access to a wholly-supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

It is also 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. Providing Stand Up Wireless with the authority necessary to offer discounted Lifeline service to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of Stand Up Wireless' Application will serve the public interest in increasing the number of ETCs in Rhode Island. By granting ETC status to Stand Up Wireless, the Commission will enable the Company to increase the number of Rhode Island residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Rhode Island. In sum, ETC designation in the State of Rhode Island would enable Stand Up Wireless to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, Stand Up Wireless would provide "increased consumer choice, high-quality service offerings, and mobility,"³⁶ as well as the safety and security of effective 911 and E911 services.³⁷

B. The Benefits of Competitive Choice

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.³⁸ Designation of Stand Up Wireless as an ETC will promote competition and innovation, and spur other carriers to target low-income consumers with service offerings tailored to their needs and to improve their existing networks to remain competitive, resulting in improved services to consumers. Designation of Stand Up Wireless as an ETC will help assure

³⁶ See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

³⁷ See *Id.* at 3391 ¶ 23.

³⁸ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.³⁹ Introducing Stand Up Wireless into the market as an additional wireless ETC provider will afford low-income Rhode Island residents a wider choice of providers and available services while enhancing the 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 amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as Stand Up Wireless or the Incumbent LEC operating in the same service area. Stand Up Wireless will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC’s Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link-Up Reform Order*, Stand Up Wireless will minimize the likelihood that its customers are not eligible or are receiving duplicative support either individually or within their household. Significantly, Stand Up Wireless’ designation as an ETC will not increase the number of persons eligible for Lifeline support. The Company’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 affordable wireless services to low-income consumers. According to the FCC, “the additional choice and service options of another wireless reseller offering a service for low-

³⁹ See 47 U.S.C. § 254(b)(1).

income consumers represents a significant benefit for consumers and is in the public interest,” and “A new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline program outweighs the potential costs.”⁴⁰

VI. ANTI-DRUG ABUSE CERTIFICATION

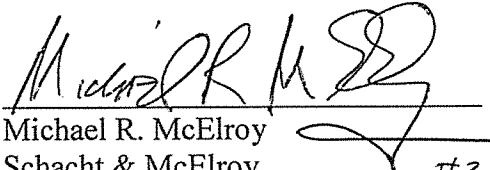
Stand Up Wireless certifies that no party to this Application is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

VII. CONCLUSION

Based on the foregoing, designation of Stand Up Wireless as an ETC in the State of Rhode Island accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, Stand Up Wireless respectfully requests that the Commission promptly designate Stand Up Wireless as an ETC in the State of Rhode Island.

Respectfully submitted,


Michael R. McElroy
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(401) 351-4100 (Phone)
(401) 421-5696 (Fax)
E-Mail: Michael@McElroyLawOffice.com

and

⁴⁰ See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

Lance J.M. Steinhart
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(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for Global Connection Inc. of
America dba STAND UP WIRELESS*

September 24, 2013

EXHIBIT 1

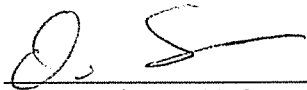
**Certification of Dave Skogen, Chief Executive Officer of Global Connection Inc. of America
dba STAND UP WIRELESS**

State of Georgia)
)
County of Gwinnett)

Certification

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Dave Skogen, who first being duly sworn, deposes and states that he is the Chief Executive Officer of Global Connection Inc. of America dba STAND UP WIRELESS, Applicant in this application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of his knowledge and belief.

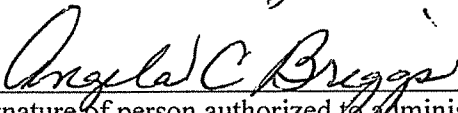
Dated: 5/22/13



Dave Skogen, Chief Executive Officer

Subscribed and sworn to before me this 22nd day of May 2013.

(Notary Seal)



(Signature of person authorized to administer oath)

My Commission Expires: ANGELA C BRIGGS
Notary Public, Gwinnett County, Ga
My Commission Expires December 3, 2013

EXHIBIT 2

Proposed Lifeline Offering

StandUP Wireless

Rate Plans
As of 7/11/12

Subsidized Rate Plans

Plan Name	Voice Minutes Included in Plan	SMS Messages Included in Plan	Unused Minutes Rollover	Unused SMS Rollover	Voicemail Caller ID Call Waiting Included	Nationwide Long Distance Included	Cost per Month
StandUP 100	100	100	Yes	Yes	Yes	Yes	FREE
StandUP 250	250 Units ¹		No	No	Yes	Yes	FREE
StandUP 500	500	500	No	No	Yes	Yes	\$14.95
StandUP1000	1000	1000	No	No	Yes	Yes	\$29.95
StandUP Unlimited	Unlimited	1000	No	No	Yes	Yes	\$34.95

¹One unit equals one voice minute or one SMS

Non-Subsidized Rate Plans

Plan Name	Voice Minutes Included in Plan	SMS Messages Included in Plan	Unused Minutes Rollover	Unused SMS Rollover	Voicemail Caller ID Call Waiting Included	Nationwide Long Distance Included	Cost per Month
StandUP 100	100	100	Yes	Yes	Yes	Yes	\$12.75
StandUP 250	250 Units ¹		No	No	Yes	Yes	\$12.75
StandUP 500	500	500	No	No	Yes	Yes	\$27.70
StandUP1000	1000	1000	No	No	Yes	Yes	\$42.70
StandUP Unlimited	Unlimited	1000	No	No	Yes	Yes	\$47.70

¹One unit equals one voice minute or one SMS

EXHIBIT 3

Sample Lifeline Certification Form

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Global Connection Inc. of America ("the Company's") Lifeline service program in your state. This Certification is only for the purpose of verifying your eligibility for Lifeline service and will not be used for any other purpose. Service requests will not be processed until this Form has been received and verified by Company.

One Lifeline service per household disclosures: Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government.

I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

Customer eligibility certification: I hereby certify that I participate in at least one of the following programs (check one):

<input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)	<input type="checkbox"/> Temporary Assistance for Needy Families (TANF)	<input type="checkbox"/> Rhode Island Works (formerly, Aid to Families with Dependent Children)
<input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA)	<input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP)	<input type="checkbox"/> General Public Assistance (GPA)
<input type="checkbox"/> Medicaid (not Medicare)	<input type="checkbox"/> National School Lunch Program's free lunch program	<input type="checkbox"/> RI Medical Assistance Program
<input type="checkbox"/> Supplemental Security Income (SSI)	<input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines	<input type="checkbox"/> RI Pharmaceutical Assistance to the Elderly (RIPAE)

Tribal eligibility: I hereby certify that I reside on Federally-recognized Tribal lands.

Customer Application Information:

First Name _____ Middle Name _____ Last Name _____

Date of Birth: Month: _____ Day: _____ Year: _____ Last Four Digits of Social Security Number or Tribal ID Number: _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____ Home Telephone Number (if available): _____

Residential Address (P.O. Box NOT sufficient) Address is (choose one): Permanent Temporary Contact Number _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Billing Address (if different from Residential Address) (P.O. Box IS sufficient) Email: _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Multiple households sharing an address:

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling 1.877.283.3890. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

If Qualifying person is different (Example: Child on School Lunch):

Name of qualifying individual

(if different than applicant; if different see Additional Certifications):

The individual named on the documentation you provided to demonstrate eligibility is part of your household and does not already receive Lifeline benefits.

Additional certifications. I hereby certify, under penalty of perjury, that (Check the box next to each line):

- I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- I am not listed as a dependent on another person's tax return (unless over the age of 60)
- The address listed below is my primary residence, not a second home or business
- If I move to a new address, I will provide that new address to the Company within 30 days
- If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- The information contained in this certification form is true and correct to the best of my knowledge.

Applicant's Signature:

Date:

FOR AGENT USE ONLY (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> The prior year's state, federal, or Tribal tax return. | <input type="checkbox"/> A Veterans Administration statement of benefits. | <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or | If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering 3 consecutive months within the previous 12 months. |
| <input type="checkbox"/> Current income statement from an employer or paycheck stub. | <input type="checkbox"/> A retirement/pension statement of benefits | <input type="checkbox"/> A divorce decree, child support award, or other official document. | |
| <input type="checkbox"/> A Social Security statement of benefits. | <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits. | | |

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

- | | | | |
|---|---|---|--|
| List A - Choose 1 | <input type="checkbox"/> National School Lunch Program's free lunch program | List B - Choose 1: | Last 4 digits of Doc / ID# from List B _____ |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Rhode Island Works (formerly, Aid to Families with Dependent Children) | <input type="checkbox"/> Program participation card/document | Date of Proof Document: _____ |
| <input type="checkbox"/> Medicaid | <input type="checkbox"/> General Public Assistance (GPA) | <input type="checkbox"/> Prior year's statement of benefits | _____/_____/_____ |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> RI Medical Assistance Program | <input type="checkbox"/> Notice letter of participation | Expiration Date of Proof Document: _____ |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> RI Pharmaceutical Assistance to the Elderly (RIPAE) | <input type="checkbox"/> Other official document evidencing participation | _____/_____/_____ |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | | | |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | | | |

Applicant Account Number: _____

Agent/Dealer Number: _____

Exhibit 4

Stand Up Wireless' FCC-Approved Compliance Plan

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

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MUMBAI, INDIA

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

April 30, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Global Connection Inc. of America Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On March 8, 2012, Global Connection Inc. of America (“Global Connection”) submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ On April 10, 2012, Global Connection submitted a revised version with a minor revision to its Model Application/Certification Form, included as Exhibit A to its Compliance Plan. Based on a meeting with Commission staff, Global Connection has further revised and supplemented its compliance plan.

Global Connection has revised its Compliance Plan to: 1) confirm in footnote 3 that Global Connection will follow the requirements of its Compliance Plan in all states where it provides Lifeline service and receives reimbursements from the federal Low-Income fund; 2) provide additional detail regarding Global Connection’s enrollment process, Company personnel training and potential fraud detection in Sections I.B. and I.F.; 4) provide additional detail regarding Global Connection’s handset activation policy in Section I.E.; and 5) revise the agent use box in the Application/Certification Form in Exhibit A.

¹ See *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 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 30, 2012
Page Two

Global Connection hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, Global Connection reiterates its request for expeditious approval of its Compliance Plan.

This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Kim Scardino
Divya Shenoy
Charles Tyler
Garnet Hanly
Alex Minard

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.²

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Stand Up Wireless (dba), and Global Connection Holdings Corporation (holding company). This Compliance Plan applies only to Global Connection’s wireless Lifeline service offerings.

² See *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 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

Lifeline customers. Global Connection will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.³

Global Connection will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.⁴ This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Global Connection will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the low income fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company’s Lifeline service plan offerings.

³ See *Lifeline Reform Order*, ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

⁴ In addition, this Compliance Plan is consistent with the compliance plan filed by Cricket Communications, Inc. See Notice of *Ex Parte* Communication of Cricket Communications, Inc., WC Docket No. 09-197 (Sept. 23, 2011) (“Cricket Compliance Plan”). The Wireline Competition Bureau approved the Cricket Compliance Plan on February 7, 2012. See *Telecommunications Carriers Eligible for Universal Service Support, Cricket Communications, Inc. Petition for Forbearance*, WC Docket No. 09-197, Order, DA 12-158 (Feb. 7, 2012).

ACCESS TO 911 AND E911 SERVICES⁵

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) 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.⁶ The Company will comply with these conditions starting on the effective date of the *Lifeline Reform Order*.

The Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint and Verizon Wireless as its underlying network provider/carrier. Sprint and Verizon Wireless route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers. To the extent that Sprint or Verizon Wireless is certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended.

⁵ See Compliance Plan Public Notice at 3.

⁶ See *Lifeline Reform Order*, ¶ 373.

Finally, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. In point of fact, the Company's phones have always been and will continue to be 911 and E911-compliant. The Company uses phones from BDI Logistics LLC that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE⁷

A. Policy

Global Connection will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules (when it becomes effective on June 1, 2012), as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a

⁷ See Compliance Plan Public Notice at 3.

household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

More than 90 percent of Global Connection's customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet. At such events, Global Connection requires all prospective customers to show a valid government-issued photo identification, which is electronically scanned to detect alterations. Each prospective customer is checked against Global Connection's internal database in real-time to ensure that the customer does not already receive a Lifeline benefit from the Company before the customer is enrolled.

As discussed in further detail in Section I.F. below, all employees or agents ("Company personnel") that conduct such in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company

personnel will review documentation establishing eligibility pursuant to the Lifeline rules.⁸ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.⁹

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.¹⁰ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (e.g., the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.¹¹

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's

⁸ See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B); Cricket Compliance Plan at 4.

⁹ See Cricket Compliance Plan at 6.

¹⁰ See *Lifeline Reform Order*, ¶ 101.

¹¹ *Id.* and section 54.410(c)(1)(i)(B).

Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.¹²

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.¹³ The Company will not retain a copy of this documentation.¹⁴ Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection.¹⁵ In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.¹⁶

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹⁷ A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

¹² See *Lifeline Reform Order*, ¶101; section 54.410.(b)(1)(i)(B).

¹³ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹⁴ See *Lifeline Reform Order*, ¶101; sections 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹⁵ See Cricket Compliance Plan at 6.

¹⁶ See *id.*

¹⁷ See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

C. Subscriber Certifications for Enrollment

Global Connection will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.¹⁸ The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally.¹⁹ Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.²⁰ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.²¹

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a

¹⁸ *Lifeline Reform Order*, ¶ 61; section 54.410(a).

¹⁹ See Cricket Compliance Plan at 3.

²⁰ See Model Application/Certification Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

²¹ See *Lifeline Reform Order*, ¶ 123.

household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.²²

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.²³

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²⁴

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name,²⁵ (2) the applicant's full residential address (P.O. Box is not sufficient²⁶); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from

²² See *id.*, ¶ 121; section 54.410(d)(1).

²³ See section 54.405(c).

²⁴ See *Lifeline Reform Order*, ¶ 114.

²⁵ See Cricket Compliance Plan at 4.

²⁶ See *Lifeline Reform Order*, ¶ 87.

which the applicant, his or her dependents, or his or her household receives benefits;²⁷ and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁸

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,²⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service;³⁰ (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's

²⁷ See Cricket Compliance Plan at 4.

²⁸ See section 54.410(d)(2). See Cricket Compliance Plan at 4.

²⁹ See *Lifeline Reform Order*. ¶¶ 168-69; section 54.419.

³⁰ See Cricket Compliance Plan at 4.

knowledge;³¹ (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.³² The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.³³

D. Annual Verification Procedures

Global Connection will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's

³¹ *See id.* at 5.

³² *See id.*

³³ *See* Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. *See id.* *See also* Cricket Compliance Plan at 5.

knowledge, the subscriber's household is receiving no more than one Lifeline service.³⁴

Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.³⁵

2012 Verification. Global Connection will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.³⁶ The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

Verification De-Enrollment. Global Connection will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.³⁷ The Company will give subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days.

³⁴ See *Lifeline Reform Order*, ¶ 120 and Cricket Compliance Plan at 8.

³⁵ See *Lifeline Reform Order*, ¶ 145.

³⁶ See *id.*, ¶ 130.

³⁷ See *Lifeline Reform Order*, ¶ 142; section 54.54.405(e)(4).

E. Activation and Non-Usage

Global Connection will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.³⁸ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁹ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.⁴⁰

³⁸ See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).

³⁹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3). See Cricket Compliance Plan at 2 (stating that it did not need to implement a non-usage policy because it offered only plans with unlimited local and long distance calling).

⁴⁰ See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴¹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection 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 live due diligence.⁴²

In addition to checking the database when it becomes available, Company personnel emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers.⁴³ Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction.⁴⁴ All customer-facing employees and agents must demonstrate understanding of the Commission’s and Global Connection’s rules and policies by completing the Company’s Lifeline training and pass a Company issued exam. The training will be updated as needed, but at least every 90 days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters.

⁴¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁴² See Cricket Compliance Plan at 9.

⁴³ See *id.* at 6, 9.

⁴⁴ See *id.*

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁴⁵

One-Per-Household. Global Connection will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household⁴⁶ through the use of its application and certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company’s Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁴⁷ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission’s one-

⁴⁵ See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *id.*, ¶¶ 189-195; section 54.404(b)(6). Further, Company will update each subscriber’s information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

⁴⁶ A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

⁴⁷ See *Lifeline Reform Order*, ¶ 78 and Cricket Compliance Plan at 7.

per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁴⁸ Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, Global Connection will verify with the subscriber every 90 days that the subscriber continues to rely on that address.⁴⁹

Finally, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service,⁵⁰ (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) what documentation is necessary for enrollment; (7) Global Connection's name (the ETC); and (8) consumers who willfully make a false statement in order to

⁴⁸ *Id.*

⁴⁹ *See Lifeline Reform Order*, ¶ 89.

⁵⁰ *See Cricket Compliance Plan* at 4.

obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.⁵¹ These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.⁵² This specifically includes the Company's website (www.StandUpWireless.com) and outdoor signage.⁵³ A sample of the Company's marketing materials is included as Exhibit B.

G. Company Reimbursements From the Fund

To ensure that the Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁴ Further, the Company will transition the submission of its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month, and inform USAC, to the extent it deems necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.⁵⁵ In addition, the Company will keep accurate records as directed by USAC⁵⁶ and as required by new section 54.417 of the Commission's rules.

⁵¹ See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

⁵² *Id.*

⁵³ *Id.*

⁵⁴ See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

⁵⁵ See *Lifeline Reform Order*, ¶¶ 302-306.

⁵⁶ See section 54.407(e).

H. Annual Company Certifications

The Company will submit an annual certification to USAC, signed by a Global Connection officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁵⁷ (2) is in compliance with all federal Lifeline certification procedures;⁵⁸ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁵⁹

In addition, the Company will provide the results of its annual recertifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).⁶⁰ Further, as discussed above, Global Connection will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁶¹

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,⁶² the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁶³ The

⁵⁷ See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

⁵⁸ See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

⁵⁹ See section 54.416(a)(3).

⁶⁰ See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

⁶¹ See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

⁶² See section 54.422(c).

⁶³ See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁶⁴ Finally, Global Connection will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.⁶⁵

I. Cooperation with State and Federal Regulators

Global Connection has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;⁶⁶
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and

⁶⁴ See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

⁶⁵ See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

⁶⁶ The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁶⁷ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.⁶⁸

II. Description of Lifeline Service Offerings⁶⁹

Global Connection will offer its wireless Lifeline service in the states where it is designated as an ETC⁷⁰ and throughout the coverage area of its underlying provider(s) Sprint and Verizon Wireless. The Company's Lifeline offering will provide customers with 100 anytime prepaid minutes per month, plus 100 anytime text messages, with rollover, at no charge. Additionally, the Company will offer a 250 anytime talk and text plan without rollover (one minute of talk time for each text). Lifeline customers can purchase additional bundles of minutes in denominations of \$5 (40 minutes), \$10 (100 minutes), \$20 (250 minutes), \$30 (500 minutes) and \$50 (1000 minutes). Airtime "top-up" minutes are available for purchase at the Company's retail locations, through customer service and on its website. Text messaging is available at the rate of one minute of talk time per text message. Additional information regarding the Company's plans, rates and services can be found on its website www.StandUpWireless.com.

In addition to free voice services, Global Connection's Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All plans include domestic long-distance at no extra per minute charge.

⁶⁷ See section 54.405(e)(1).

⁶⁸ See Cricket Compliance Plan at 10.

⁶⁹ See Compliance Plan Public Notice at 3.

⁷⁰ Global Connection is currently designated as an ETC in Arkansas, Louisiana, Maryland, Missouri and West Virginia.

Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷¹

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷² The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April, 2011. The Company generates substantial revenues from non-Lifeline services and has access to capital from its investors. The majority owner of Global Connection is Milestone Partners, a Pennsylvania private equity firm. Consequently, Global Connection has not relied, and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

⁷¹ See Compliance Plan Public Notice at 3.

⁷² See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁷³ Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁷⁴ The Company provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's current Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, Global Connection will not provide toll limitation service ("TLS"), which allows low income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance

⁷³ Compliance Plan Public Notice at 3.

⁷⁴ 47 C.F.R. § 54.202(a)(1).

toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁷⁵

IV. Conclusion

Global Connection submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



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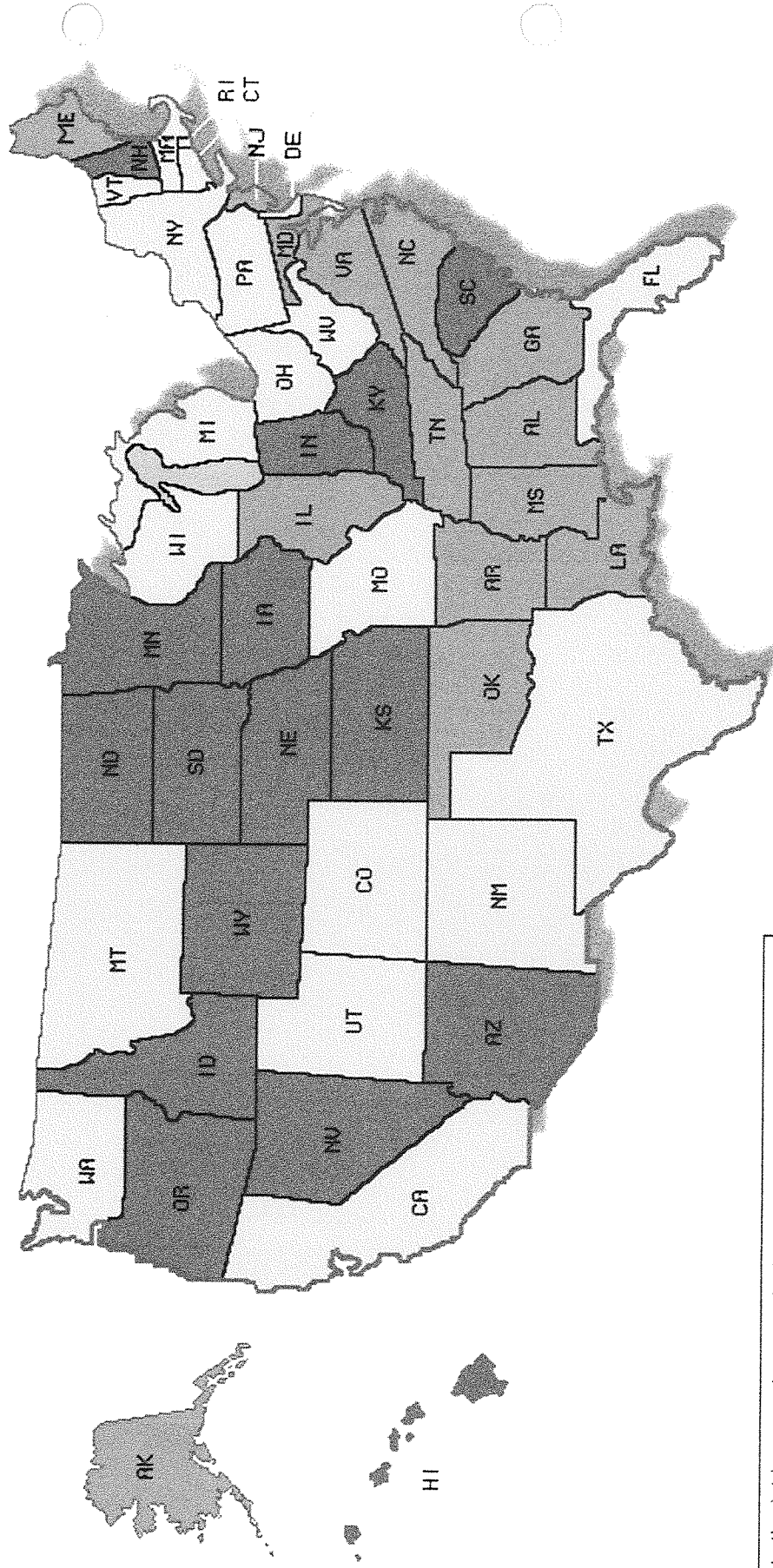
⁷⁵ See *Lifeline Reform Order*, ¶ 230.

EXHIBIT 5

2011 Lifeline Participation Rates by State

2011 Lifeline Participation Rates by State

- - Below 10%
- - 10% - 20%
- - 20% - 50%
- - Above 50%



Note: Due to the intricacy and range of criteria that are used to determine eligibility for the Lifeline program and the limitations of the data used, the methodology employed to create this map involves several estimates, assumptions, simplifications, and omissions. Therefore, the rates generated on this map should be treated as estimates only.

EXHIBIT 6

Wire Centers

CLLI	ILEC	WIRE CENTER
ASTNRAN	VERIZON NEW ENGLAND INC.	PAWTUCKET
ASWYRIYB	VERIZON NEW ENGLAND INC.	WESTERLY
BLISRIOT	VERIZON NEW ENGLAND INC.	BLOCK IS
CNTNRIPH	VERIZON NEW ENGLAND INC.	PROVIDENCE
CNTYRIST	VERIZON NEW ENGLAND INC.	COVENTRY
CRLNRIMA	VERIZON NEW ENGLAND INC.	CAROLINA
EGRNRICH	VERIZON NEW ENGLAND INC.	GREENWICH
EPRVRINB	VERIZON NEW ENGLAND INC.	PROVIDENCE
GLCSRIWG	VERIZON NEW ENGLAND INC.	SCITUATE
GLCSRIWG	VERIZON NEW ENGLAND INC.	CENTREDALE
HPVYRIMA	VERIZON NEW ENGLAND INC.	HOPEVALLEY
JMTWRINA	VERIZON NEW ENGLAND INC.	JAMESTOWN
LTCMRIWE	VERIZON NEW ENGLAND INC.	LTLCOMPTON
NKTWRIPH	VERIZON NEW ENGLAND INC.	NO KINGSTN
NPRVRIMS	VERIZON NEW ENGLAND INC.	CENTREDALE
NPRVRIMS	VERIZON NEW ENGLAND INC.	PROVIDENCE
NRGNRIMA	VERIZON NEW ENGLAND INC.	NARRAGNSTT
NWPTRIBU	VERIZON NEW ENGLAND INC.	NEWPORT
PRVDRIWA	VERIZON NEW ENGLAND INC.	PROVIDENCE
PRVDRIWA	VERIZON NEW ENGLAND INC.	PROVIDENCE
PSCGRIPA	VERIZON NEW ENGLAND INC.	PASCOAG
PSCGRIPA	VERIZON NEW ENGLAND INC.	WGLOCESTER
PTMORIEM	VERIZON NEW ENGLAND INC.	PORTSMOUTH
PWTCRIHI	VERIZON NEW ENGLAND INC.	PAWTUCKET
RVSDRISO	VERIZON NEW ENGLAND INC.	WARREN
RVSDRISO	VERIZON NEW ENGLAND INC.	PROVIDENCE
SCTTRISI	VERIZON NEW ENGLAND INC.	SCITUATE
TVTNRHA	VERIZON NEW ENGLAND INC.	TIVERTON
WKPGRIWA	VERIZON NEW ENGLAND INC.	WESTERLY
WNSCRICL	VERIZON NEW ENGLAND INC.	WOONSOCKET
WNSCRICL	VERIZON NEW ENGLAND INC.	CUMBLND HL
WRLYRIMA	VERIZON NEW ENGLAND INC.	WESTERLY
WRRNRIEV	VERIZON NEW ENGLAND INC.	WARREN
WRRNRIEV	VERIZON NEW ENGLAND INC.	BRISTOL
WRWKRIWS	VERIZON NEW ENGLAND INC.	W WARWICK
WRWKRIWS	VERIZON NEW ENGLAND INC.	WARWICK
WRWKRIWS	VERIZON NEW ENGLAND INC.	PROVIDENCE
WWWKRIMA	VERIZON NEW ENGLAND INC.	W WARWICK

EXHIBIT 7

Key Management Bios

Officer Biography for Global Connection Inc.

David Skogen, CEO

David, a twenty year Telecommunications veteran, joined Global Connection as COO in October of 2009 and was promoted to CEO in January 2010. Prior to joining Global Connection, Dave was Director and General Manager for Verizon Prepaid. In that role, he led the \$100M+ business unit and was responsible for all functions including Sales, Marketing, Finance and Operations. Before being named General Manager, Dave was Director of Marketing and Operations for MCI Prepaid.

In addition to his responsibilities with the Prepaid organization, Dave held many other positions during his twenty year career with MCI/Verizon including Access Cost Management auditor, Senior Manager of Small Business Operations and Director of Business Development for Small Business and Call Center Services.

Dave graduated with a BBA – Finance, with distinction, from the Henry B. Tippie College of Business at the University of Iowa in 1989.