 **Cincinnati Bell**  
221 E. Fourth St.  
P.O. Box 2301  
Cincinnati, Ohio 45201-2301

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PUBLIC SERVICE  
COMMISSION

February 17, 2011

Mr. Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602-0615

**RE: Petition of Cincinnati Bell Wireless LLC for Designation as an Eligible  
Telecommunications Carrier**

Dear Mr. Derouen:

Enclosed please find an original and ten copies of a Petition of Cincinnati Bell Wireless LLC for Designation as an Eligible Telecommunications Carrier for the Limited Purpose of Offering Lifeline Service to Qualified Households.

If you have any questions regarding this submission, or require further information, please contact Bob Wilhelm at 513-397-6858 or by e-mail at bob.wilhelm@cinbell.com. Thank you for your attention to this matter.

Sincerely,



Jouett K. Brenzel  
Corporate Counsel

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of** )  
 )  
**Petition of Cincinnati Bell Wireless LLC** ) **Case No.** \_\_\_\_\_  
**for Designation as a Nonrural Eligible** )  
**Telecommunications Carrier for the** )  
**Limited Purpose of Offering Lifeline** )  
**Service to Qualified Households** )

**PETITION OF CINCINNATI BELL WIRELESS LLC FOR DESIGNATION AS A  
NONRURAL ELIGIBLE TELECOMMUNICATIONS CARRIER  
FOR THE LIMITED PURPOSE OF OFFERING LIFELINE SERVICE TO  
QUALIFIED HOUSEHOLDS**

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Jouett K. Brenzel  
221 E. Fourth Street, 103-1280  
Cincinnati, OH 45202  
(513) 397-7260  
E-mail: [jouett.brenzel@cinbell.com](mailto:jouett.brenzel@cinbell.com)

Attorney for Cincinnati Bell Wireless LLC

February 17, 2011

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Cincinnati Bell Wireless LLC (“CBW”), pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (“ the Act”), 47 U.S.C. § 214(e)(2), hereby petitions the Kentucky Public Service Commission (“Commission”) for designation as a nonrural eligible telecommunications carrier (“ETC”) in the Commonwealth of Kentucky. CBW seeks ETC designation solely for the purpose of participation in the federal Universal Service Fund’s (“USF”) Lifeline program. CBW does not seek ETC designation for participation in the USF high cost program. As demonstrated herein, CBW satisfies all of the statutory and regulatory requirements for designation as an ETC in the Commonwealth of Kentucky. CBW requests that the Commission expeditiously grant this Petition so that CBW can begin providing a competitive Lifeline alternative for eligible consumers in Northern Kentucky.

## I. INTRODUCTION

CBW is a wholly owned subsidiary of Cincinnati Bell Inc., an Ohio corporation with headquarters in Cincinnati, Ohio. CBW is a facilities-based wireless provider that holds Broadband PCS, AWS and 700 MHz services licenses covering the Greater Cincinnati and Dayton metropolitan areas, several counties in Northern Kentucky, and portions of Indiana. CBW offers both postpaid and prepaid wireless plans. It currently serves over 500,000 subscribers using GSM and 3G technology and offers nationwide voice roaming to all subscribers. In addition, postpaid subscribers have access to international voice and data roaming. Approximately 20% of CBW's subscribers are in Kentucky. CBW's prepaid plans are marketed under the brand name of i-wireless.<sup>1</sup>

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<sup>1</sup> Cincinnati Bell Inc., through its subsidiary CBW, provides pre-paid wireless services under the federally registered trademark "i-wireless." In September 2004, Cincinnati Bell Inc. entered into a license agreement with Iowa Wireless Services, LLC ("Iowa Wireless"), a T-Mobile affiliate based in Urbandale, Iowa. The license grants the company the non-exclusive, non-transferable right to use the mark throughout the state of Iowa and in certain counties in Illinois, Missouri, Nebraska, South Dakota and Wisconsin. See [www.iwireless.com](http://www.iwireless.com) for additional details. In June 2006, Cincinnati Bell Inc. entered into a second license agreement for use of the i-wireless trademark with i-wireless, LLC (formerly Cinthex, LLC), located in Newport, Kentucky. i-wireless, LLC is a mobile virtual network operator ("MVNO") providing nationwide prepaid wireless services using the Sprint PCS network. Under the terms of the license, i-wireless, LLC has the exclusive right to use the i-wireless trademark in sale and promotion of its prepaid wireless services outside of CBW's greater Cincinnati and Dayton footprints. i-wireless, LLC also has the non-exclusive right to use the i-wireless mark within the greater Cincinnati and Dayton markets, subject to certain in-market conditions, and within the license areas granted to Iowa Wireless. Specifically, i-wireless, LLC's use of the mark in the greater Cincinnati and Dayton markets is generally limited to Kroger retail stores. CBW and i-wireless, LLC have an interoperability agreement that allows customers of both companies to buy and activate prepaid airtime cards purchased at Kroger stores and other select chain stores including Speedway and United Dairy Farmers; i-wireless, LLC customers cannot, however, activate CBW's i-wireless prepaid cards purchased at most other distribution outlets. See [www.iwirelesshome.com](http://www.iwirelesshome.com) for additional details about i-wireless, LLC. The FCC recently granted i-wireless, LLC's petition for forbearance from the facilities requirement for ETC designation for Lifeline support (*i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, CC Docket No. 96-45, Order, rel. June 25, 2010). Subsequently, i-wireless, LLC has filed for ETC designation in several states, including Kentucky. (Case No. 2010-00478 filed December 6, 2010) Should i-wireless, LLC receive ETC designation to provide Lifeline in Kentucky, CBW does not foresee any inherent conflicts between the CBW i-wireless Lifeline offering and any Lifeline service provided by i-wireless, LLC. Because CBW will require Lifeline subscribers to enroll in person at a Cincinnati Bell-owned store or an authorized Cincinnati Bell distributor location, CBW will be able to closely monitor the enrollment process and ensure that subscribers understand that the service they are subscribing to is provided exclusively by CBW. All reporting by CBW for USF reimbursement will be filed under the CBW LLC name, so there should be no possibility that any Lifeline funds are misallocated to i-wireless, LLC or vice versa.

In this Petition, CBW seeks designation as an ETC within its Kentucky service area so that it can offer three prepaid wireless Lifeline plans to qualifying low-income consumers. As with all of CBW's prepaid plans, there will be no credit checks and no contracts. Unlike some other carriers' prepaid wireless Lifeline offerings, CBW Lifeline customers will be able to select from the full line-up of prepaid handsets and will have access to all of the features and functionalities available to non-Lifeline subscribers.

The availability of three different plans will enable Lifeline customers to choose the one that best meets their needs, while realizing savings off of the non-Lifeline rates. During these challenging economic times, when the poverty rate is at a 15 year high and with many households from all income levels having "cut the cord," these plans will provide low-income households with more options for obtaining Lifeline discounts.<sup>2</sup> With CBW's proposed Lifeline plans, as described below, consumers will have additional wireless alternatives including plans comparable to landline Lifeline service with long distance.

## **II. CBW REQUESTS ETC DESIGNATION IN ITS KENTUCKY SERVICE AREA FOR PARTICIPATION IN THE LIFELINE PROGRAM**

### **A. The Commission has Authority to Designate CBW as an ETC**

According to Section 214(e)(2) of the Act, in the case of a non-rural area, a state commission shall designate a common carrier as an ETC if the designation is consistent with the public interest, convenience, and necessity. A specific public interest finding is not required.

In the instant petition, CBW requests designation as an ETC throughout its Northern Kentucky service area. Attachment A identifies the specific wire centers that correspond to

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<sup>2</sup> See *Income, Poverty and Health Insurance Coverage in the United States: 2009*, U. S. Census Bureau Report released Sept. 16, 2010. See also the FCC's *Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, WT Docket No. 09-66, Fourteenth Report released May 20, 2010 at paras. 339-340 indicating that over 21 percent of households were wireless only in the first half of 2009.

CBW's Kentucky service area where CBW seeks ETC designation. Cincinnati Bell Telephone Company LLC ("CBT") is the ILEC is all of these wire centers, and all of these wire centers are considered non-rural. However, the rural or non-rural status of the wire centers is irrelevant for this ETC application because CBW is only seeking designation for the provision of Lifeline service. The rural/non-rural distinction is only a factor when an ETC is seeking high-cost Universal Service support.

As demonstrated in the remainder of this petition, CBW's request for designation as an ETC for providing Lifeline service is consistent with the public interest, convenience, and necessity. CBW's proposed Lifeline program will benefit low income Kentuckians by offering them alternatives to the traditional landline-based Lifeline offering and providing additional prepaid wireless Lifeline options. For those low income consumers who prefer wireless service over landline service, CBW's program offers three Lifeline plans designed to meet consumers' individual needs. Moreover, CBW's Unlimited Talk and Text plan and Mega Monthly plan are unique compared to other prepaid wireless Lifeline options from other carriers. Unlike most other prepaid wireless Lifeline plans, either approved or proposed, these two plans provide the Lifeline customer a discount off of the generally available CBW prepaid plans and offer unlimited local calling comparable to ILEC plans. Although CBW believes that consumers will benefit by having additional competitive options for wireless Lifeline service in Kentucky, CBW is also cognizant of the need to control the size of the federal USF. Therefore, CBW has designed its program to safeguard against fraud and abuse and incorporated measures to remove inactive accounts from USF reimbursement.



**B. CBW Meets the Requirements for Designation as an ETC in Its Kentucky Service Area**

Section 214(e)(1) of the Act and section 54.201(d) of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 54.201(d), provide that an applicant for ETC designation must be a common carrier that offers the services supported by federal USF mechanisms using either its own facilities or a combination of its own facilities and resale of another carrier's services and that the applicant must advertise the availability of the supported services and the rates for these services. As described below, CBW satisfies each of these requirements.

1. CBW is a Facilities-based Common Carrier

As indicated above, CBW is a facilities-based carrier. Attachment B lists CBW's wireless licenses. Furthermore, as attested to in the affidavit provided in C, CBW has built out both a GSM and 3G network within the area in which it requests designation as an ETC. The map included in Attachment D shows the coverage area of CBW's prepaid local network.

2. CBW Will Provide the Services that are Supported by the Universal Service Program

All of CBW's i-wireless Lifeline plans will include the following services and functionalities required by section 54.101 of the FCC's rules, 47 C.F. R. § 54.101:

a. Voice Grade Access to the Public Switched Telephone Network

CBW provides voice grade access to the public switched telephone network ("PSTN") via its network and through roaming agreements with other carriers when customers travel outside of the CBW coverage area using bandwidth between 300 to 3,000 Hertz. As required by

the FCC's rules, CBW's voice service includes signaling the network that the caller wishes to place a call and a signal indicating that there is an incoming call.<sup>3</sup>

b. Local Usage

As part of the voice grade access to the PSTN, an ETC must provide local calling services to its customers.<sup>4</sup> While the FCC's rules do not specify the number of local minutes that an ETC must provide, an ETC must offer a local usage plan that is comparable to the one offered by the incumbent local exchange carrier ("ILEC") in the area in which it seeks ETC designation. In its review of ETC applications, the FCC has determined that each ETC's local usage plans should be considered on a case-by-case basis, including the nature of the supported service, the size of the local calling area, the inclusion of additional services, and the amount of local usage.<sup>5</sup>

CBW's proposed Lifeline program satisfies the criteria established by the FCC. As described fully below, CBW will offer Lifeline customers a choice of three prepaid plans. Each plan includes local voice minutes, with the Connect Plan providing 250 minutes free of charge. For many people, this option will be less expensive than landline Lifeline service because no ILEC in Kentucky offers a free Lifeline service. While the Connect Plan does not provide the unlimited local calling that a person can receive with the ILEC's Lifeline service, many people are paying \$10 to \$12 per month for ILECs' unlimited calling services.<sup>6</sup> Even if a person does not want flat rate service from the ILEC and opts for measured service to further reduce expenses, the person cannot obtain service for free.<sup>7</sup> Moreover, with CBW's plans, the local

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<sup>3</sup> 47 C.F.R. § 54.101(a)(1).

<sup>4</sup> 47 C.F.R. § 54.101(a)(2).

<sup>5</sup> See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6385 (2005).

<sup>6</sup> For an example of typical Lifeline pricing in the areas CBW proposes to serve, see Cincinnati Bell Telephone Company LLC ("CBT") General Exchange Tariff, PSCK No. 3, Section 53, 2<sup>nd</sup> Revised Page 5.

<sup>7</sup> For example, the least expensive measured service available from CBT is \$8.80 per month, (Exchange Rate Tariff, PSCK No. 2, Section 2, Original Page 1.1.) and this price is limited to certain exchanges. If this service was provided to a Lifeline customer with the \$7.00 discount to maximize the federal Lifeline contribution, the service

calling area is nationwide,<sup>8</sup> compared to the small local calling area of the typical ILEC, and CBW's plans include voice mail, call waiting and caller ID that are generally available from ILECs for an additional monthly charge. Under the Unlimited Talk and Text Plan, a Lifeline customer will pay \$22.75 per month, a price that is less than comparable landline service bundles available in the areas where CBW proposes to provide Lifeline service.<sup>9</sup> Thus, CBW's Lifeline plans compare favorably to the wireline plans available to low income consumers given the added benefits of a nationwide calling area, mobility, and texting plus the availability of Internet access with the Unlimited Talk and Text Plan and Mega Monthly Plan.

c. Dual Tone Multi-Frequency Signaling or Its Functional Equivalent

Dual tone multi-frequency ("DTMF") signaling enables carriers to expedite the transmission of call set up and call detail information. All handsets offered for sale by CBW are DTMF-capable as required by 47 C.F. R. § 54.101(a)(3).

d. Single-party Service or Its Functional Equivalent

In the case of a wireless carrier, single-party service means that the user has a dedicated transmission path for the length of the user's particular transmission.<sup>10</sup> CBW provides a dedicated transmission path for all calls. Multi-party service is not available.

e. Access to Emergency Services

The FCC has defined access to emergency services as access to services, such as 911 and enhanced 911 ("E911"), provided by local governments or other public safety organizations.<sup>11</sup>

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would cost \$1.80 per month without any usage. Each local minute of use would cost \$0.03. Thus, 250 minutes of local calling would cost the landline customer an additional \$7.50, for a total monthly bill of \$9.30.

<sup>8</sup> Local calling in this context means that prepaid subscribers can initiate a call from anywhere in CBW's prepaid local network area to anywhere in the continental United States for the same rate.

<sup>9</sup> For example, a bundle consisting of CBT's HomePak Lite Service, which provides a flat rate access line, call waiting, caller ID, and voice mail, and Cincinnati Bell Any Distance ("CBAD") unlimited long distance would cost at least \$28 per month for a Lifeline customer (\$18.00 for HomePak Lite, including the \$7.00 Lifeline discount to maximize the federal Lifeline contribution, plus at least \$10.00 for unlimited long distance).

<sup>10</sup> 47 C.F.R. § 54.101(a)(4).

CBW provides access to 911 emergency services for all of its customers. CBW also notes that it fully supports the state wireless 911 funding system by contributing to the fund for both its postpaid and prepaid subscribers. CBW uses the average revenue per user methodology authorized by KRS 65.7635 (1)(b) to determine its 911 contribution for its prepaid subscriber base. CBW includes all Kentucky prepaid revenue in the calculation and will not reduce its revenue to reflect the discounted service for Lifeline customers if this ETC application is approved. In other words, CBW will count the amount of its reimbursement from the Universal Service Lifeline Support Fund as earned prepaid revenue.<sup>12</sup>

f. Access to Operator Services

All of CBW's Lifeline customers will have access to operator services in accordance with 47 C.F.R. § 54.101(a)(6). By dialing "0" within CBW's prepaid network coverage area, a Lifeline customer will be able to reach an operator for call completion services.

g. Access to Interexchange Service

Each of CBW's proposed Lifeline plans provides customers with the ability to access interexchange service (i.e., the ability to make long distance calls) as required by 47 C.F.R. § 54.101(a)(7). In fact, CBW's Lifeline plans include domestic long distance calling with no additional charges if the subscriber is calling from within CBW's prepaid local network footprint.<sup>13</sup>

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<sup>11</sup> 47 C.F.R. § 54.101(a)(5).

<sup>12</sup> Similarly, CBW contributes to the Kentucky Universal Service Fund for Lifeline support, the Kentucky Telecommunications Relay Service and the Kentucky Telecommunications Access Program based on the number of postpaid plus prepaid subscribers.

<sup>13</sup> Calls placed when outside the CBW prepaid local network footprint incur roaming charges.

h. Access to Directory Assistance

All CBW customers have the ability to access directory assistance as required by 47 C.F.R. § 54.101(a)(8). By dialing 411, CBW customers can access national directory assistance to obtain directory listings from around the country.

i. Toll Limitation for Qualifying Low Income Consumers

Toll limitation, as defined by 47 C.F.R. § 54.400(d), includes either a toll blocking service by which consumers can block outgoing calls from their phone or toll control that enables consumers to specify a certain amount of toll usage that may be incurred each month or billing cycle.<sup>14</sup> Since CBW's proposed Lifeline plans are prepaid plans, they implicitly satisfy the toll limitation requirement of 47 C.F.R. § 54.101(a)(9) by limiting consumers to the selected number of minutes or pre-paid dollar amount each month. The only way a Lifeline customer can go above the plan amount is to buy additional prepaid minutes. Thus, the consumer clearly has the ability to specify the amount of usage that may be incurred each month.

3. Advertising of Supported Services

As required by section 54.201(d)(2) of the FCC's rules, 47 C.F.R. § 54.201(d)(2), CBW widely advertises the availability of its services via television, radio, and newspapers to reach consumers throughout CBW's serving area. In addition, information about CBW's postpaid and prepaid services is available on CBW's website [www.cincinnatiatibell.com](http://www.cincinnatiatibell.com). Information about CBW's i-wireless prepaid offerings is also available directly at [www.i-ontheweb.com](http://www.i-ontheweb.com) and is advertised via point-of-sale signage, billboards, bus wraps, and direct mailings.

Upon designation as an ETC, CBW will update its website to include the details of its Lifeline program. An example of the type of information that will be provided on CBW's website is provided in Attachment E. In addition, CBW will advertise the availability of Lifeline

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<sup>14</sup> 47 C.F.R. § 54.400(b).

through various channels designed to reach those most likely to qualify for the service.

Specifically, CBW proposes to build awareness and promote its Lifeline program via:

- Point of sale signage and brochures within corporately owned retail stores and authorized i-wireless distribution locations;<sup>15</sup>
- Promotional signage and brochures at supporting local social service agencies;
- Direct mailers to public housing complexes and other low income areas;
- Public service announcements on local radio stations; and
- Providing information about the CBW program on the Universal Service Administrative Company (“USAC”) website at [www.lifelinesupport.org](http://www.lifelinesupport.org).

CBW also intends to reach out to social service agencies within its area to promote the service and to assist customers with the enrollment process. As mentioned above, CBW will provide promotional signage and brochures to supporting local social service agencies for display and distribution. In addition, CBW will submit advertising for such agencies to include in monthly newsletters at their discretion and work with supporting organizations regarding mailings to their clients. CBW will also institute a referral program for participating social service agencies. The agencies will assist customers in filling out the CBW Lifeline Application/Referral form (Attachment F) and then direct them to a Cincinnati Bell/i-wireless store to complete the enrollment and activation process. The Application/Referral form will contain a section for the agency’s five-digit agency code to ensure that the agency receives credit for the referral. Social service agencies that choose not to participate in the referral program will still be provided with promotional signage and brochures about CBW’s Lifeline program.

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<sup>15</sup> Because CBW does not currently provide Lifeline service in any other states, it does not have samples of actual advertising. The materials provided in Attachments E and F are examples of what CBW contemplates its website, signage and brochures will look like. Upon approval of CBW’s Lifeline program, the promotional material will be refined to reflect the final details of the program.

**C. Additional Requirements Imposed by the FCC on Wireless Resellers Should Not be Applied to CBW**

Unlike some of the other prepaid wireless providers that have applied for ETC designation in Kentucky to provide Lifeline service, CBW is a facilities-based carrier. Therefore, the additional conditions that the FCC has attached to its wireless reseller ETC forbearance orders should not be applied to CBW. The FCC wireless reseller forbearance orders have required TracFone and other wireless resellers to:

- 1) provide its Lifeline customers with 911 and E911 access regardless of activation status and availability of prepaid minutes;
- 2) provide its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service;
- 3) comply with conditions (1) and (2) as of the date it provides Lifeline service;
- 4) obtain a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or the carrier must self-certify that it does so if the PSAP does not provide the certification within a specified period of time;
- 5) require each customer to self-certify at time of service activation and annually thereafter that he or she is the head of household and receives Lifeline-supported service only from that carrier;
- 6) establish safeguards to prevent its customers from receiving multiple Lifeline subsidies from that carrier at the same address;
- 7) deal directly with the customer to certify and verify the customer's Lifeline eligibility; and
- 8) submit a compliance plan outlining the measures the carrier will take to implement these obligations.<sup>16</sup>

The FCC developed these conditions specifically for pure wireless resellers, indicating in the TracFone Forbearance Order that any similarly situated prepaid wireless reseller seeking forbearance from the facilities-based requirements of section 214(e) of the Act for the purpose of providing only Lifeline support would be expected to comply with all of the same conditions.<sup>17</sup>

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<sup>16</sup> See *Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.202(i)*, CC Docket No. 96-45, Order 20 FCC Rcd 15095 (2005) (TracFone Forbearance Order) at para. 16, 18-19, and 25.

<sup>17</sup> *Id.* at para.21.

The 911 and E911 conditions were imposed by the FCC to ensure that the wireless resellers do not shirk their responsibility to provide access to basic and E911 service to the extent that their underlying facilities-based carrier has deployed the facilities to deliver E911 to the appropriate PSAPs. In the CBW/i-wireless case, CBW is a facilities-based carrier and fully complies with the FCC's 911/E911 requirements that it deliver E911 information to the appropriate PSAPs in its operating area. All CBW handsets are E911 compliant and can access E911 regardless of activation status and availability of prepaid minutes. Thus, as a facilities-based provider, no additional 911 certification should be required for CBW.

The FCC imposed conditions (5) through (8) on wireless resellers in an attempt to safeguard the USF by limiting the possibility that Lifeline consumers receive more than one Lifeline discount for the same household. The conditions were imposed by the FCC solely on wireless resellers to ensure that the requested forbearance was consistent with the consumer protection requirement of Section 10(a)(2) of the Act. These conditions are not appropriate with respect to CBW because CBW is not a wireless reseller. Although CBW shares the FCC's and this Commission's concern about waste, fraud, and abuse of the USF and the need to limit the size of the fund, there is no basis for applying more stringent conditions on one facilities-based ETC than on other facilities-based ETCs. While the FCC recognized more than five years ago that "the potential for more than one Lifeline-supported service per eligible consumer is an industry-wide problem," it has not yet imposed any additional verification requirements on facilities-based ETCs.<sup>18</sup> Nevertheless, despite the fact that the additional conditions imposed by the FCC on wireless resellers are not applicable to facilities-based ETCs, CBW has incorporated safeguards into its Lifeline program to attempt to prevent duplicate Lifeline service at the same household. These safeguards are described below in Section IV.

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<sup>18</sup> *TracFone Forbearance* at para.18.



#### **D. CBW has Received ETC Designation in Ohio**

CBW petitioned for ETC designation to provide Lifeline service in Ohio on November 1, 2010 in Case No. 10-2449-TP-UNC. The Public Utilities Commission of Ohio conditionally granted CBW's petition by Finding and Order issued December 29, 2010. CBW has not yet begun offering Lifeline service in Ohio, but anticipates it will begin offering Lifeline in Ohio within two to three months.

### **III. CBW'S LIFELINE PROGRAM**

#### **A. The Plans**

CBW's proposal offers qualifying consumers three options. One plan, the Connect Plan, is designed specifically for Lifeline subscribers and will provide 250 minutes free of charge each month. The other two plans will simply provide Lifeline customers with a discount on two of CBW's popular prepaid calling plans. Each of the plans, which are fully described below, includes voice mail, caller ID, call waiting and 3-way calling. And as with all of CBW's i-wireless prepaid plans, no credit check is required, there is no activation fee, and customers are not charged for calls to prepaid wireless customer support telephone numbers. Under any of the Lifeline plans, customers may choose from the entire i-wireless handset lineup for the retail sale price in effect at the time of purchase. The handsets and prices currently available to i-wireless subscribers are shown in Attachment G. Existing CBW prepaid customers will be able to use their current phones for CBW's Lifeline service. In addition, Lifeline customers can use handsets they already own if they are unlocked and compatible with CBW's wireless network. Lifeline customers may change from one Lifeline plan to another at no charge.

1. The Connect Plan

The Connect Plan will provide a Lifeline customer 250 monthly domestic anytime minutes originating within CBW's local prepaid network free of charge. Any unused free minutes remaining at the end of the month expire. Roaming minutes and additional domestic minutes will be 10 cents per minute. Text messages can be sent for 20 cents per message, but there will be no charge to receive text messages. No data usage will be allowed. Subscribers must add money to their accounts to obtain additional voice minutes, send text messages, and access roaming. They can do so by purchasing i-wireless cards, which are widely available at retail outlets throughout CBW's local operating area.<sup>19</sup> They can also add money to their account via credit card by calling 611 or CBW's toll free customer care number from their wireless phone or by accessing their account on-line at [www.i-ontheweb.com](http://www.i-ontheweb.com). Purchased dollar balances roll over from month to month as long as additional funds are added to the account prior to the expiration period for the purchased amount.

Customers who want to keep track of their usage and available minutes may do so by calling designated numbers from their wireless phone. Specifically, customers may dial #BAL or call 877-231-2401 to hear their account dollar balance, or dial #MIN or 866-589-2644 to hear their minute usage (of the 250 free local minutes allowance) during their monthly service period. There is no charge for these calls and they do not count against the 250 free local minutes allowance. Customers may also check their dollar balance and usage on-line at [iontheweb.com](http://iontheweb.com). Handsets do not display the account dollar balance or minutes.

For Connect Plan customers, CBW will seek reimbursement from the Universal Service Low Income Support Fund of \$8.75, which is the sum of the Tier 1, Tier 2 and Tier 3 support

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<sup>19</sup> Attachment H shows the increments in which additional i-wireless airtime can be purchased and the corresponding expiration periods.

allowed under section 54.403 of the FCC's rules.<sup>20</sup> CBW will claim \$5.25 of support under Tier 1, which is based on the subscriber line charge of the incumbent local exchange carriers in the area. Given CBW's serving area in Kentucky, CBW anticipates that its Lifeline subscribers will be within the CBT ILEC territory. CBT's current SLC is \$5.24, and it has ranged from \$5.24 to \$5.28 over the last year. To avoid modifying the discount when an ILEC SLC changes by a few pennies, CBW proposes using a consistent \$5.25 for the Tier 1 portion of the discount. (In recent years, \$5.25 has generally been less than the lowest ILEC SLC in CBW's serving area and, therefore, it does not raise any issues relative to CBW seeking reimbursement for an amount that exceeds the average SLC in its serving area.<sup>21</sup>) Because Connect Plan Lifeline subscribers will receive the equivalent of \$25 worth of airtime free of charge (250 minutes times \$0.10/minute) compared to CBW's non-Lifeline Simply 10 Plan under which subscribers pay 10 cents per minute for all domestic calls placed within CBW's prepaid network, CBW will also be entitled to the full amount of Tier 2 support (\$1.75) and Tier 3 support (\$1.75) as well as the full reimbursement amount from the Kentucky Universal Service Fund (\$3.50). In other words, this plan will maximize the contribution of federal assistance, in keeping with the Commission's rules, by providing a discount of \$18 beyond the default federal discount of the SLC plus monthly discount of \$1.75.<sup>22</sup>

## 2. The Unlimited Talk and Text Plan

Lifeline customers will be able to subscribe to CBW's Unlimited Talk and Text Plan for \$22.75 per month. The non-Lifeline price for this plan is \$35. Lifeline customers will receive

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<sup>20</sup> 47 C.F.R. § 54.403.

<sup>21</sup> In general, CBW's serving area is the Greater Cincinnati and Dayton metropolitan areas in Southwest Ohio, Northern Kentucky, and Indiana. CBW's serving area in Ohio encompasses many ILEC areas served by AT&T, CenturyLink, or Frontier. Overall, CBT and AT&T ILEC areas comprise the majority of CBW's service area. Thus, CBW factored in AT&T's SLC, which is currently \$5.42, to determine the standard \$5.25 SLC within CBW's service area.

<sup>22</sup> CBW will not seek toll limitation service reimbursement or Link-Up reimbursement from USAC if granted ETC status.

the exact same features and functions as non-Lifeline customers of the plan but will pay \$12.25 less for the service. This plan provides subscribers with unlimited domestic anytime minutes originating from within CBW's local prepaid network plus 100 roaming minutes each month. Additional roaming minutes are 10 cents per minute. This plan also includes unlimited text messaging. Data (i.e., Internet) usage is available at 5 cents per kilobyte and can be accessed by adding additional money to the account by purchasing i-wireless cards at retail outlets or by making credit card purchases by calling 611 or CBW's toll free customer care number from their wireless phone or on-line at [www.i-ontheweb.com](http://www.i-ontheweb.com).

As with the Connect Plan, CBW will seek reimbursement from the Universal Service Low Income Support Fund of \$8.75 per month (Tier 1, Tier 2, and Tier 3 support) and \$3.50 from the Kentucky Universal Service Fund for each Unlimited Talk and Text Plan Lifeline subscriber, equivalent to the total discount of \$12.25 from the regular retail price.

3. Mega Monthly Plan

Lifeline subscribers who are heavy data users may find the Mega Monthly Plan attractive. This plan, which is normally priced at \$45 per month, will be available to Lifeline customers for \$32.75 per month. This plan provides unlimited domestic anytime minutes originating from within CBW's local prepaid network plus 1000 roaming minutes. Additional roaming minutes are 10 cents per minute. Furthermore, this plan includes unlimited text messaging and 100 megabytes of data usage. Additional data usage is available at 5 cents per kilobyte and can be accessed by adding additional money to the account by purchasing i-wireless cards at retail outlets or by making credit card purchases by calling 611 or CBW's toll free customer care number from their wireless phone or on-line at [www.i-ontheweb.com](http://www.i-ontheweb.com).

As with the Unlimited Talk and Text Plan, CBW will seek reimbursement from the Universal Service Low Income Support Fund of \$8.75 per month (Tier 1, Tier 2, and Tier 3 support) and \$3.50 from the Kentucky Universal Service Fund for each Mega Monthly Plan Lifeline subscriber since subscribers are receiving a \$12.25 discount from the regular retail price.

**B. Removal of Inactive Accounts**

To ensure that inactive accounts are not included in CBW's monthly Lifeline USF reimbursement, CBW will monitor accounts for inactivity. Accounts will be considered inactive if they have no usage for 60 days. CBW will not seek reimbursement for any inactive accounts. Connect Plan customers who do not use any minutes for 60 days will be considered inactive. Unlimited Talk and Text Plan and Mega Monthly Plan Lifeline accounts will be considered inactive if they do not add sufficient funds to their account to cover the monthly service fee for two consecutive months.<sup>23</sup>

Although CBW will not seek reimbursement for inactive accounts, a subscriber can reactivate a Lifeline account within 30 days of its becoming inactive by using minutes on the Connect Plan or adding money to cover the monthly service fee for the Unlimited Talk and Text Plan or Mega Monthly Plan. For example, if a Connect Plan customer has no usage in June and July of 2011 (60 days of inactivity), the account will be considered inactive and CBW will not seek reimbursement from USAC in August 2011. However, CBW will not deactivate the customer's account until September 1, 2011. Thus, if the customer uses minutes under the Connect Plan in August, the account will be considered reactivated, and CBW will then seek

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<sup>23</sup> Because these are prepaid plans, customers must add, at a minimum, an amount sufficient to cover the monthly service fee. If the customer has funds remaining on their account greater than or equal to the next month's service fee (i.e., \$22.75 for Unlimited Talk and Text Plan Lifeline subscribers and \$32.75 for Mega Monthly Plan Lifeline subscribers) at the end of the customer's 30-day prepaid period, the service fee will be deducted from their account balance and their service will continue uninterrupted. However, if the balance remaining at the end of the 30-day prepaid period is less than the next month's service fee, the funds will not be deducted until the customer adds enough money to cover the monthly service fee.

reimbursement from USAC for this customer in September. However, if the customer does not use any minutes by the end of August (90 days of inactivity), the account will be deactivated and the customer will have to re-enroll in Lifeline to receive additional benefits.

**C. The CBW Lifeline Enrollment Process**

**1. Enrollment Locations**

Under CBW's proposed Lifeline program, consumers will be required to sign up in person. CBW believes that an in-person enrollment process is less subject to fraud and abuse than enrollment via phone, on-line, or mail. With an in-person enrollment, the customer's identification documentation will be examined by trained personnel at the point of sale who will also secure the customer's signature attesting to their eligibility for the Lifeline program. This direct contact with the enrolling customer helps to ensure that the enrolling customer is actually the head of household as required by federal and state rules. Furthermore, an in-person enrollment enables the customer to leave the store with an activated phone, unlike other enrollment methods which require the phone to be mailed to the customer after enrollment is complete. In-person enrollment also ensures that subscribers have direct contact with CBW-trained representatives who can fully explain the details of the Lifeline program.

Under CBW's program, prospective Lifeline customers will be able to sign up at any of Cincinnati Bell's retail stores. In addition, customers can sign up at any third-party wireless distributor that has access to CBW's i-wireless ordering system ("Direct Distributors"). A complete list of Cincinnati Bell stores and Kentucky Direct Distributors and their locations is provided in Attachment I. In total, CBW offers eleven locations in Northern Kentucky where people can enroll in Lifeline.

By allowing enrollment through Direct Distributors, the Lifeline program will be far more accessible to low income consumers than offering it through Cincinnati Bell retail stores alone, while still giving CBW direct oversight over the enrollment process. CBW has a very close relationship with Direct Distributors. Because they have been given direct access to CBW's i-wireless ordering system, they undergo training in the use of the system and must adhere to CBW's policies relative to the use of the system and the protection of customer information. CBW agents visit each location monthly to check on operations to ensure compliance with the distribution agreement. If approved as enrollment agents for CBW's Lifeline program, CBW will provide Lifeline program training for each Direct Distributor and their employees and the monthly visits by CBW managers will include a review of their processes to ensure continued compliance with the Lifeline enrollment procedures.

The only difference between the enrollment via a Cincinnati Bell retail store and a Direct Distributor is the manner in which the customer's signature will be obtained. Cincinnati Bell retail stores are equipped with electronic signature pads, whereas the third-party distributors do not have this capability. Therefore, customers will be able to sign an electronic signature pad attesting to their qualification for the Lifeline program if they enroll at a Cincinnati Bell retail store. Customers who enroll at a Direct Distributor location, on the other hand, will be required to sign a paper copy of the certification form. The Direct Distributors will retain the signed forms and turn them over to the CBW manager during the monthly inspection. CBW will then scan the forms into a database for retention purposes.

## 2. Application Process

Upon arriving at one of the authorized enrollment locations, prospective Lifeline customers will be required to provide the following information to enroll in the program.<sup>24</sup> All of the information will be entered directly into CBW's i-wireless ordering system.

1. Name
2. Address
3. Birth date
4. Form of photo ID and ID number
5. Head of household status
6. No other Lifeline service is active at the household
7. Category of Lifeline service eligibility:
  - a. Medicaid
  - b. Food Stamps
  - c. Supplemental Security Income (SSI)
  - d. Federal Public Housing Assistance (Section 8)
  - e. Low Income Home Energy Assistance Program (LIHEAP)
  - f. Temporary Aid for Needy Families (TANF)
  - g. National School Lunch (NSL) - free lunch program

If enrolling at a Cincinnati Bell retail store, the customer will sign the electronic signature pad certifying under penalty of perjury that the above information is true and accurate and that he or she will promptly notify CBW if their address changes, they no longer receive benefits from one of the qualifying programs, or otherwise are no longer eligible for Lifeline. If enrolling at a Direct Distributor location, the customer will sign a paper document certifying under penalty of perjury that the information provided to the agent is true and accurate.<sup>25</sup>

When the information is entered into the ordering system, it will cross-check the customer address against CBW's Lifeline database to determine if CBW is already providing Lifeline service at this address. If Lifeline service is already active at this address, the customer

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<sup>24</sup> See Attachment F for a draft of the printed enrollment form brochure that will be available at supporting social service agencies.

<sup>25</sup> See Attachment J for a draft of the Direct Distributor certification signature document. Customers enrolling at a Cincinnati Bell retail location will sign this document electronically.



will not be enrolled. If the customer wants to contest this denial, they will be directed to contact CBW's Lifeline coordinator to review any evidence the customer can provide to substantiate that they are eligible for Lifeline service.

After the enrollment is complete, the customer will select the desired Lifeline rate plan and a handset. A telephone number will then be assigned or the customer's existing number ported to CBW. The telephone number must be a Kentucky number with the 859 area code in order for the customer to be eligible for CBW's Kentucky Lifeline program. The agent will then activate the phone, and the customer will have working service. Before leaving the store the customer must pay for the handset, any applicable monthly fee if subscribing to the Unlimited Talk and Text Plan or the Mega Monthly Plan, and any additional purchased airtime.

#### **IV. ANNUAL CERTIFICATION AND VERIFICATION**

Each year CBW will require each Lifeline subscriber to recertify their head of household status, certify that only one Lifeline discount is received at that household, and document their continued program eligibility for Lifeline in accordance with the annual Lifeline Certification and Verification for USAC that is due annually at the end of August and in accordance with Kentucky Public Service Commission Administrative Case No. 360.

CBW will mail each of its Lifeline customers a letter,<sup>26</sup> via the U.S. Postal Service, explaining the audit and providing a form that they must complete and return to certify that they remain eligible for Lifeline.<sup>27</sup> Additionally, CBW will send text messages to these customers to

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<sup>26</sup> CBW will send this mailing in approximately May of each year. Customers who have had service for less than one month will not be included in the audit because their certifications will be current. All other customers will be included in the audit. While some Lifeline customers enrolled for less than 12 months will have to recertify less than a year from enrolling, their certification will occur annually thereafter, and this process assures that all customers are recertified annually using a common recertification time line.

<sup>27</sup> The form will require the same information as the application form in Attachment J with formatting and wording changes to accommodate this mailing. The form will also provide a list of examples of acceptable documentation of program eligibility.

inform them of the audit and to alert them of the need to respond to keep their Lifeline benefits. Customers will not be charged to receive these text messages. As with the initial Lifeline application, each customer must certify under penalty of perjury that they meet the qualifications for Lifeline i.e., they are the head of household, no other Lifeline service is active at that address, and they are program eligible. Customers must also attach documentation of program eligibility to the completed form, when returning the form to CBW.


CBW will send a second mailing, via the U. S. Postal Service, to customers who do not respond to the first mailing. This letter will be similar to the first audit letter and will further explain that the customer has 60 days to respond to this mailing, in keeping with federal regulations, or CBW will terminate their Lifeline benefits. As with the first mailing, customers must complete the certification form, attach documentation of program eligibility, and return the completed form and attachments to CBW. Customers who do not respond to the second mailing and verify their continued eligibility for Lifeline will be able to use the minutes on their existing plan until the expiration date for their current month's service. Thereafter, they will default to the i-wireless Simply 10 Plan which charges ten cents for each minute. This will enable customers to use any purchased airtime remaining on their account. Customers who want to convert to another CBW plan to use their remaining balances may do so by contacting CBW. However, to receive the Lifeline discount on the Unlimited Talk and Text Plan or the Mega Monthly Plan or to re-enroll in the Connect Plan, customers must reapply for Lifeline service.

## **V. CONCLUSION**

As demonstrated herein, CBW satisfies all of the statutory and regulatory requirements for designation as an ETC in the Commonwealth of Kentucky and its designation as an ETC for providing Lifeline service is consistent with the public interest, convenience, and necessity. For

these reasons, CBW respectfully requests that the Commission expeditiously grant this Petition so that CBW can begin providing competitive Lifeline alternatives for eligible consumers in Northern Kentucky.

Respectfully submitted,

By: 

Jouett K. Brenzel  
221 E. Fourth Street, 103-1280  
Cincinnati, OH 45202  
(513) 397-7260

Attorney for Cincinnati Bell Wireless LLC

February 17, 2011

# Attachment A

Cincinnati Bell Wireless LLC  
Kentucky Lifeline ETC Wire Centers

**Cincinnati Bell Wireless LLC  
Kentucky Lifeline ETC Wire Centers**

<b>Wire Center CLLI</b>	<b>Exchange/Wire Center Name</b>	<b>County</b>	<b>ILEC</b>
ALXNKYAL	Alexandria	Campbell	Cincinnati Bell
BURLKYBN	Boone - Burlington	Boone	Cincinnati Bell
FLRNKYFL	Boone - Florence	Boone	Cincinnati Bell
UNINKYAC	Boone - Union	Boone	Cincinnati Bell
BTLRKYBR	Butler	Pendleton	Cincinnati Bell
CVTNKYCN	Covington (Kentucky Metro) - Covington	Kenton	Cincinnati Bell
FLRNKYFL	Covington (Kentucky Metro) - Florence	Kenton	Cincinnati Bell
FTTHKYFT	Covington (Kentucky Metro) - Fort Thomas	Campbell	Cincinnati Bell
LKPKKYLP	Covington (Kentucky Metro) - Lakeside Park	Kenton	Cincinnati Bell
FLMOKYUA	Falmouth	Pendleton	Cincinnati Bell
GLCOKYGC	Glencoe	Gallatin	Cincinnati Bell
INDPKYIN	Independence	Kenton	Cincinnati Bell
WLTNKYWL	Walton	Boone	Cincinnati Bell
WRSWKYWR	Warsaw	Gallatin	Cincinnati Bell
CRTDKYCT	Williamstown - Crittenden	Grant	Cincinnati Bell
WLTWKYWT	Williamstown - Williamstown	Grant	Cincinnati Bell

# Attachment B

## CBW Spectrum Licenses

### Cincinnati Bell Wireless LLC Spectrum Licenses

Call Sign	Holder	Frequencies (MHz)	Channel Block	Geographic area
WPOI243	CBW LLC	001850.0000-001865.0000 001930.0000-001945.0000	A	MTA018 Cincinnati-Dayton BTA 081 Cincinnati (21 Counties) BTA106 Dayton-Springfield (10 Counties)
WQIZ531	CBW LLC	00698.0000-00704.0000 00728.0000-00734.0000	A	BEA050 Dayton-Springfield, OH
WQGB249	CBW LLC	001710.0000-001720.0000 002110.0000-002120.0000	A	CMA592 - Ohio 8 - Clinton
WQGB248	CBW LLC	001710.0000-001720.0000 002110.0000-002120.0000	A	CMA588 - Ohio 4 - Mercer
WQGB246	CBW LLC	001710.0000-001720.0000 002110.0000-002120.0000	A	CMA180 - Springfield, OH
WQGB245	CBW LLC	001710.0000-001720.0000 002110.0000-002120.0000	A	CMA145 - Hamilton-Middletown, OH
WQGB243	CBW LLC	001710.00000-001720.0000 002110.0000-002120.0000	A	CMA040 - Dayton, OH
WQGB242	CBW LLC	001710.00000-001720.0000 002110.0000-002120.0000	A	CMA023 - Cincinnati, OH-KY-IN

## Attachment C

Affidavit of Richard P. Benken



**AFFIDAVIT OF RICHARD P. BENKEN**

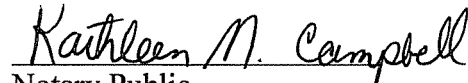
Comes now the Affiant, Richard P. Benken, and having first been duly cautioned and sworn, states as follows:

1. I am the Managing Director - Wireless Network for Cincinnati Bell Wireless LLC ("CBW").
2. I have been employed by Cincinnati Bell for 24 years. For the last 6 years, I have directly overseen the build out of CBW's wireless license areas using GSM and 3G technologies.
3. Today, Cincinnati Bell employs 132 wireless sites/transmitters to deliver postpaid and prepaid wireless services to customers throughout its Kentucky license areas. The majority of these wireless facilities are concentrated in Boone, Campbell, Gallatin, Grant, and Kenton Counties. These sites provide service coverage to approximately 93.8% of the population living in the license area according to the 2000 U.S. census data.

FURTHER AFFIANT SAYETH NAUGHT.

  
Richard P. Benken

Sworn to before me and subscribed in my presence by the said Richard P. Benken on this 16th day of February, 2011.

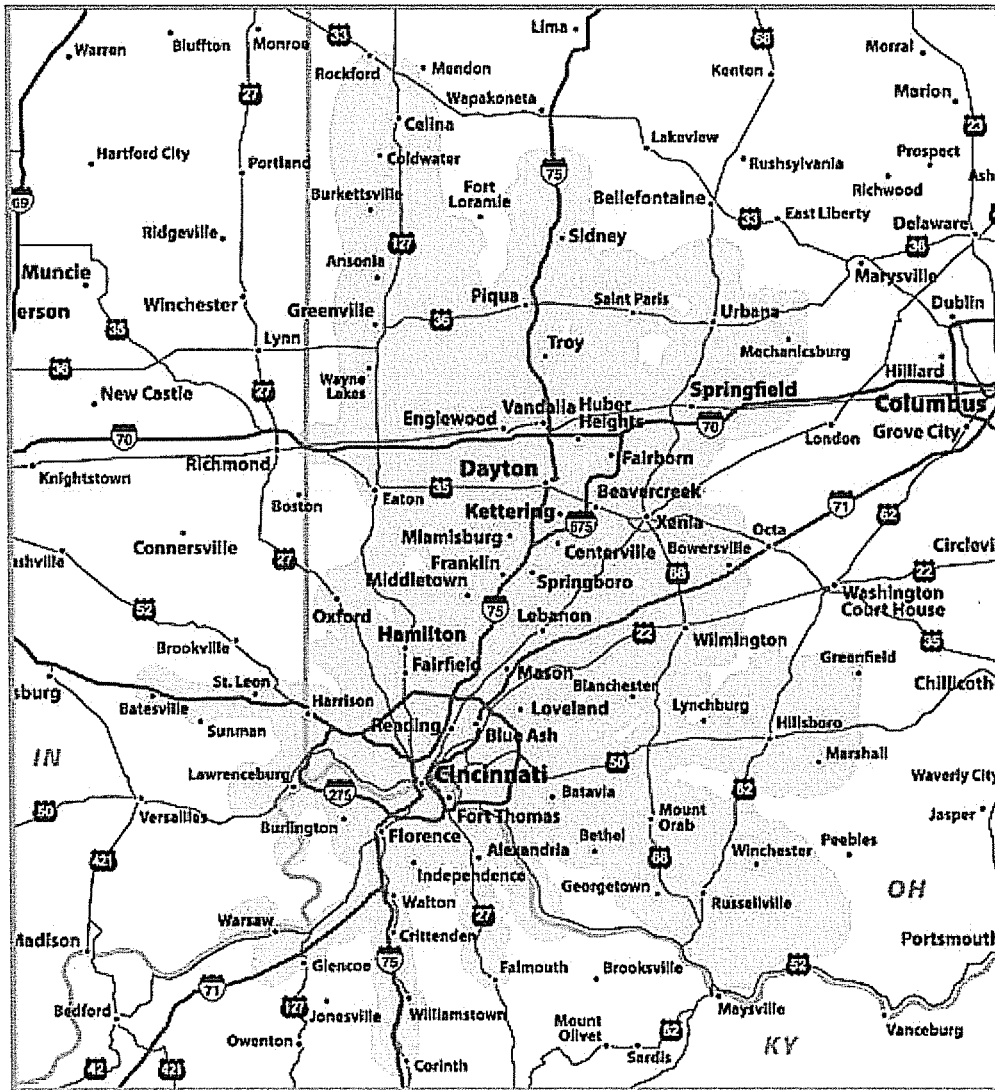
  
Notary Public

**KATHLEEN M. CAMPBELL**  
Notary Public, State of Ohio  
My Commission Expires 10-14-2013

# Attachment D

## CBW i-wireless Local Network Coverage Area Map

Cincinnati Bell Wireless  
i-wireless  
Local Network Coverage Area



## Attachment E

### Information on CBW Website and Promotional Signage (Drafts)



wireless<sup>SM</sup>

Home | My Account | Feedback

Store Locations

Feedback

My Account | Basket

Shop Phones

Rate Plans

Buy Airtime

Ringtones & Graphics

Self Care

Activate

Coverage

Help

### Lifeline Program

# Plans that fit your Lifestyle & Budget



The Lifeline Wireless Program is designed to assist qualifying customers with their wireless telephone service needs, in an effort to make wireless service available to all consumers. [Who is eligible?](#)

[Find a Store Near You](#)

	Connect Plan	Unlimited Talk & Text Plan	Mega Monthly Plan
PLAN	250 local minutes 10 cent roaming 10 cent additional local minutes 20 cents per sent text message Free to receive No data capabilities Minutes do not rollover	Unlimited local minutes Unlimited text messaging	Unlimited local minutes 10 cent roaming minutes Unlimited text and picture messages 100 megabytes data 5 cents per kilobyte overage
COST	\$0 Monthly Fee	\$22.75 Monthly Fee	\$32.75 Monthly Fee

wireless service

YOU CAN TRUST.

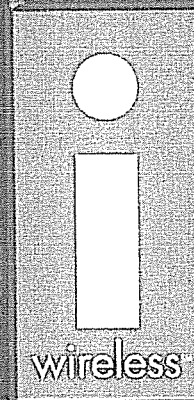
at a price

YOU CAN AFFORD.

You may be  
eligible for

250

FREE WIRELESS  
MINUTES  
per month!\*



\*Customer must be on an eligible assisted income program to qualify. Wireless Connect Plan includes 250 minutes per month within the Cincinnati/Dayton local calling area for a \$0 monthly fee. Additional discounted minutes, rate plans, text and data plans available. Visit Cincinnati Bell Retail location for details.

# Attachment F

## CBW Lifeline Application Form (Draft)



## What is i-wireless Lifeline?

The Lifeline Wireless Program is designed to assist qualifying customers with their wireless telephone service needs.

## Why i-wireless Lifeline Service?

Affordable Wireless Service  
 No Hidden Fees  
 No Contract  
 Unlimited Minute Plans  
 Unlimited Texting Plans  
 Long Distance  
 Voicemail  
 Caller ID  
 Nationwide Coverage

## How to Apply for Service?

Fill out this application form, sign it, and bring it to a Cincinnati Bell Store.

**\*\* Only one Lifeline service \*\***  
**\*\* per household \*\***

## Complete Application and Sign

*(All information is required)*

\_\_\_\_\_  
 Applicant's Name (Please Print)

\_\_\_\_\_  
 Date of Birth

\_\_\_\_\_  
 Address

\_\_\_\_\_  
 City, State, Zip Code

\_\_\_\_\_  
 Driver's License / ID Number

## Public Benefit Programs

Please check the boxes below for each of the programs from which you receive benefits. If you do not receive benefits from at least one of these programs, you are not eligible for Lifeline service.

- Section 8 Housing/Public Housing
- Medicaid
- Food Stamps
- Supplemental Security Income (SSI)
- HEAP (Any Home Energy Assistance Plan)
- Temporary Aid for Needy Families (TANF)
- Free School Lunch Program

Agency Number: \_\_\_\_\_  
 (Note: To be completed only by social service organizations assisting with Lifeline enrollment.)

## Complete Application and Sign

*(All information is required)*

Please check the boxes below for each of the following statements that are true. You are not eligible for Lifeline unless all of the following statements are true.

- No other Lifeline service is active at the address given. (Includes landline and wireless Lifeline services.)
- I am not listed as a dependent on another person's income tax return. (Customers over 60 are exempt from this rule.)
- I am eligible for Lifeline service benefit program checked above.

I authorize Cincinnati Bell or its representative to have access to any records of public agencies or employers needed to verify my statements on this application and to confirm Lifeline eligibility.

I state under penalty of perjury that all representations on this application are true. I will promptly notify Cincinnati Bell if my address changes, or if I no longer receive benefits from at least one of these programs.

\_\_\_\_\_  
 Signature

\_\_\_\_\_  
 Date

Return Application to Any  
 Cincinnati Bell Retail Store.  
 For store locations, visit  
[www.cincinnati-bell.com](http://www.cincinnati-bell.com)

## You May Be Eligible For One of the Following i-wireless Lifeline Plans!

### The Connect Plan:

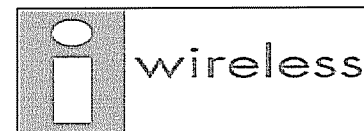
250 Free Minutes Per Month  
 \$.20 per sent Text Message  
 Incoming Texts are Free  
 \$.05 per Data KB

### Unlimited Talk & Text

Only \$22.75 Per Month  
 Unlimited Minutes & Text  
 \$.05 per Data KB

### Mega Monthly Plan

Only \$32.75 Per Month  
 Unlimited Minutes & Text  
 100MB of Data per Month  
 \$.05 per Data KB Overages





Attachment G

CBW Handset Options

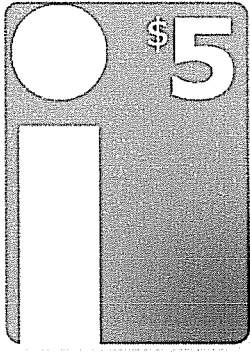
**Cincinnati Bell Wireless LLC**  
**i-wireless Handset Line-Up**  
February, 2011

Handset	Price
Alcatel 305	\$ 19.99
Nokia 2330	\$ 19.99
Alcatel 565	\$ 29.99
Moto WX345 Finch	\$ 39.99
Samsung Strike T459	\$ 59.99
Motorola Starling EX112	\$ 79.99
LG KP-500 Cookie	\$ 79.99
Motorola EX126	\$ 89.99
Moto Razr V3 06 Black or Silver	\$ 89.99
Alcatel Tribe Pro	\$ 89.99
Alcatel Gem Pink & Chrome	\$ 99.99
Alcatel aVengeance	\$ 109.99
Samsung Gravity 2 T-469	\$ 109.99
Nokia 5230	\$ 149.99
Huawei U8100 Android 2.1	\$ 149.99
Alcatel 981 Android Black or White	\$ 199.99
Cincinnati Bell Blaze 2.1	\$ 219.99
Blackberry 9300	\$ 249.99
Blackberry 9100	\$ 279.99
Motorola Milestone XT720	\$ 389.99
Blackberry 9780	\$ 429.99

# Attachment H

## CBW Airtime Cards Amounts and Expiration Periods

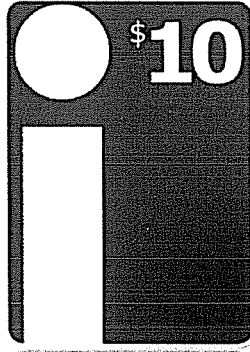
**5 Dollar Airtime Pin**



\*Expires 10 days from the date the card is activated



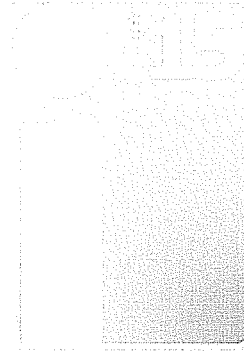
**10 Dollar Airtime Pin**



\*Expires 30 days from the date the card is activated



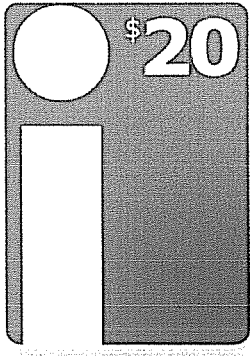
**15 Dollar Airtime Pin**



\*Expires 30 days from the date the card is activated



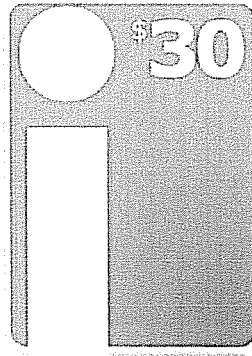
**20 Dollar Airtime Pin**



\*Expires 90 days from the date the card is activated

[» Add to basket](#)

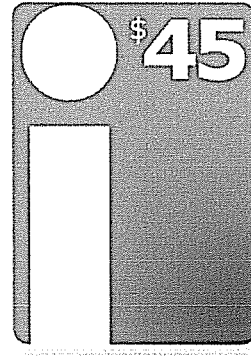
**30 Dollar Airtime Pin**



\*Expires 90 days from the date the card is activated

[» Add to basket](#)

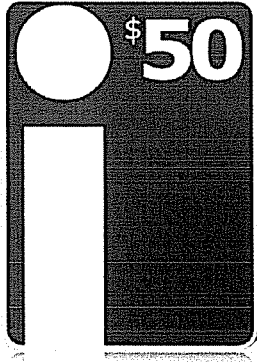
**60 Dollar Airtime Pin**



\*Expires 90 days from the date the card is activated

[» Add to basket](#)

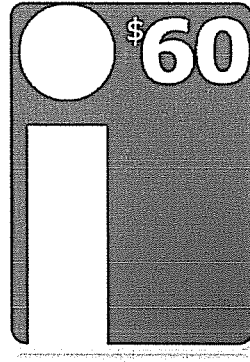
**50 Dollar Airtime Pin**



\*Expires 90 days from the date the card is activated

» Add to basket

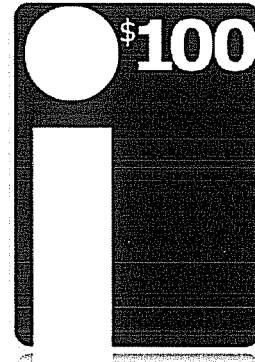
**60 Dollar Airtime Pin**



\*Expires 90 days from the date the card is activated

» Add to basket

**100 Dollar Airtime Pin**



\*Expires 365 days from the date the card is activated

» Add to basket

# Attachment I

## Cincinnati Bell Store and Direct Distributor Locations

**Cincinnati Bell Wireless**  
**Greater Cincinnati Retail Stores**  
 February, 2011

<b>Store Location</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>
Bridgewater Falls	3425 Princeton Rd	Hamilton	OH	45011
Crestview Hills Town Center	2895 Dixie Hwy	Crestview Hills	KY	41017
Deerfield Township	5325 Deerfield Blvd	Mason	OH	45040
Downtown Cincinnati	201 East Fourth St	Cincinnati	OH	45202
Eastgate Mall	4601 Eastgate Blvd	Cincinnati	OH	45245
Florence Mall	2028 Mall Circle Rd	Florence	KY	41042
Hyde Park Plaza	3880 Paxton Ave	Cincinnati	OH	45209
Jungle Jim's	5440 Dixie Highway	Fairfield	OH	45014
Kenwood	7565 Kenwood Rd	Cincinnati	OH	45236
Lebanon	50 south Broadway	Lebanon	OH	45036
Northgate Mall	9597 Colerain Ave	Cincinnati	OH	45251
Tri-county Mall	11332 Princeton Pike	Cincinnati	OH	45246
University of Cincinnati	535 Steger Life Center	Cincinnati	OH	45221
West Chester Plaza	7842 Cox Rd	West Chester	OH	45069
Western Hills	5098 Glencrossing Way	Cincinnati	OH	45238

Note: Additional information regarding store locations, including directions and telephone numbers, is available at: <http://www.i-ontheweb.com/help/stores/>



**Cincinnati Bell Wireless**  
**Kentucky Direct Distributors**  
February, 2011

<b>Distributor Name</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>
Complete Wireless	4135 Alexandria Pike Suite 206	Cold Springs	KY	41076
Complete Wireless	7955 Mall Road	Florence	KY	41042
Complete Wireless	2887 Alexandria Pike	Highland Heights	KY	41076
Complete Wireless	1709 Monmouth St Unit A	Newport	KY	41071
Warsaw Wireless	1035 Vandercar Way	Florence	KY	41042
Warsaw Wireless	3933 Winston Ave	Latonia	KY	41015
Wireless Connection	2601 Benton Rd	Covington	KY	41011
Wireless Connection	802 Patterson St	Newport	KY	41071
Wireless Plus One	1102 Central Ave	Newport	KY	41071

Note: Direct Distributors are distributors that have direct access to CBW's ordering systems. In addition to the Direct Distributors in this table, CBW's Greater Cincinnati Direct Distributors have over 40 locations in Ohio.

# Attachment J

Certification Document for  
Use by CBW Direct Distributors  
(Draft)



wireless<sup>SM</sup>

Customer Name: \_\_\_\_\_ Address: \_\_\_\_\_

Wireless Number: \_\_\_\_\_ DOB: \_\_\_\_\_ ID #: \_\_\_\_\_

Please check the box or boxes below for each of the programs from which you receive benefits. If you do not receive benefits from at least one of these programs, you are not eligible for Lifeline service.

- Free School Lunch Program
- Food Stamps
- Low Income Home Energy Assistance Program (HEAP)
- Medicaid
- Section 8 Housing/Public Housing
- Supplemental Security Income (SSI)
- Temporary Aid for Needy Families (TANF)

By checking the boxes below, you certify that you are eligible to receive Lifeline benefits:

- No other Lifeline service is active at the address given. (Includes landline and wireless Lifeline service.)
- I am not listed as a dependent on another person's income tax return. (Customers over 60 are exempt from this rule.)
- I am eligible for Lifeline service benefit program checked above.

I state under penalty of perjury that all representations on this application are true. I will promptly notify Cincinnati Bell Wireless if my address changes, or if I no longer receive benefits from at least one of these programs.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_