

April 30, 2013

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MAY 01 2013

PUBLIC SERVICE
COMMISSION

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

RE: *American Broadband and Telecommunications Company's Petition for Designation as an Eligible Wireless Telecommunications Carrier in the Commonwealth of Kentucky*

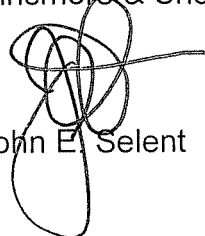
Dear Mr. Derouen:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") is one original and ten (10) copies of American Broadband and Telecommunications Company's Petition for Designation as an Eligible Wireless Telecommunications Carrier in the Commonwealth of Kentucky in the above-styled case.

In addition, enclosed is a copy for file-stamping. Please return this copy to us in the self-addressed, postage prepaid envelope furnished herewith. Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

Dinsmore & Shohl LLP



John E. Selent

JES:KRH:ksc
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of)
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)
American Broadband And)
Telecommunications Company) Case No. _____
)
Petition For Limited Designation)
As An Eligible Wireless)
Telecommunications Carrier)
_____)

**PETITION OF AMERICAN BROADBAND AND TELECOMMUNICATIONS
COMPANY FOR LIMITED DESIGNATION AS AN
ELIGIBLE WIRELESS TELECOMMUNICATIONS CARRIER**

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May 1, 2013

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**PETITION OF AMERICAN BROADBAND AND TELECOMMUNICATIONS
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ELIGIBLE WIRELESS TELECOMMUNICATIONS CARRIER**

American Broadband and Telecommunications Company (“Petitioner”, “Company” or “American Broadband”), by its undersigned counsel and pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), hereby submits this Petition for Limited Designation as a Wireless Eligible Telecommunications Carrier (“ETC”) to the Kentucky Public Service Commission (“Commission”). American Broadband requests that the Commission designate the Company as a prepaid wireless ETC provider in Kentucky for the sole purpose of receiving federal universal service Lifeline support¹ in the geographic area specified in this Petition. American Broadband does not seek ETC status for the purpose of

¹ See 47 C.F.R. § 54.400, *et seq.*

receiving support from any other federal or state universal service funds, nor does it seek to offer services in high-cost or rural areas.

As discussed in greater detail below, American Broadband meets the federal and state statutory and regulatory requirements for ETC designation. The Company is ready and able to provide the services supported by the Lifeline program throughout its designated service areas in Kentucky. Granting ETC status to the Company will benefit the public interest and further the goals of the Lifeline program by enabling American Broadband to provide affordable and quality telecommunications services to a broad range of low income consumers in Kentucky. Moreover, low income consumers in Kentucky will benefit from the increased choice of service providers and service options resulting from grant of American Broadband's ETC designation request. Accordingly, the Company requests the Commission grant this Petition expeditiously. In support of this Petition, American Broadband respectfully states as follows:

I. BACKGROUND

A. Company Overview

American Broadband provides prepaid wireless services on a common carrier basis. The Company is a Delaware corporation and is registered with the Kentucky Secretary of State to operate as a foreign carrier in Kentucky.² American Broadband filed its tariffs with the Commission on December 13, 2012 to provide competitive wireline and wireless telecommunications services in Kentucky. The Company's primary offices are located at 1 Seagate, Suite 600, Toledo, Ohio, 43699.

American Broadband is currently authorized to provide competitive telecommunications services to consumers in the States of Illinois, Indiana, Michigan and Ohio,

² American Broadband's Secretary of State registration is attached hereto as Exhibit A.

West Virginia and Wisconsin on a resale and facilities-basis. American Broadband first began providing telecommunications service in 2004, and currently provides data, local and long distance wireline services to over 35,000 residential and small business customers in the Company's service territories. The Company provides local exchange, exchange access, and broadband services using its own switching and DSL2+ network facilities, and a combination of unbundled network elements ("UNEs") provided by AT&T Kentucky ("non-rural ILECs") which allows end-to-end delivery of calls. American Broadband provides wireless telecommunications services in the states of Illinois, Indiana, Michigan, Ohio, West Virginia and Wisconsin. The Company provides wireless services, including voice and data, to its small business customers by reselling the wireless service of SprintCom, WirelessCo., L.P. and Nextel West Corp. (collectively "Sprint PCS"). The Company provides wireless service to over 10,000 subscribers throughout its nationwide service territory.

American Broadband is designated as an ETC in the states of Michigan, Ohio, Indiana, Wisconsin and West Virginia. In addition to seeking wireless ETC status in Kentucky, the Company currently has pending applications or plans to file applications for certification and wireless ETC status in California, Florida, Illinois, Minnesota, Missouri, New York, North Carolina, Ohio, Pennsylvania, Tennessee, and Texas.

B. Contact Information

The American Broadband contact for all correspondence relating to this application is:

Jeffrey Ansted
President
American Broadband and Telecommunications Company
1 Seagate, Suite 600
Toledo, OH 43699

Copies of all correspondence relating to this application should be sent to the following:

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C. American Broadband's Lifeline Offerings

American Broadband, through its resale arrangements with Sprint PCS will offer all of the services supported by the Lifeline program³ to eligible consumers throughout the Company's designated service area in Kentucky. Once designated as an ETC, the Company will offer Lifeline-eligible consumers the same wireless service features and functionalities that the Company offers to its non-Lifeline customers.

American Broadband's primary objective is to provide wireless telecommunications services to underserved areas and low income consumers in all of its service areas. To this end, the Company's business plan is tailored to address the needs of underserved consumers that cannot afford traditional telephone service as well as businesses that promote economic. The Company typically actively invests financially in the areas it serves, including funding new local business plans and ventures, and anticipates making similar investments in Kentucky, and affirms that support received from the universal service fund will be used strictly in accordance with the FCC's universal service rules.

³ See 47 C.F.R. § 54.201(d)(1).

American Broadband offers its wireless subscribers attractive and affordable packages of telephone service with other value-added features. The services are offered on a prepaid basis so subscribers are not burdened by lengthy contracts nor does the Company conduct credit checks. Current pricing for American Broadband's prepaid Lifeline wireless service offerings can be found at the Company's website at its American Assistance link: <http://www.americanassistance.com/program/>.

American Assistance is the Company's Lifeline Assistance program supported by the Federal Universal Service Fund. Qualified applicants can receive a free cell phone, 250 free monthly minutes and 250 free text messages for a package price of \$9.25, which on net, after applying the Lifeline credit, would be free to customers. American Assistance also allows customers to add minutes and texts to their plan as needed, including the following:

100 Talk	100 Talk Minutes	\$6.99
250 Talk and Text	250 Talk Minutes + 250 Text Messages	\$9.99
500 Talk and Text	500 Talk Minutes + 500 Text Messages	\$19.99
1,000 Talk and Text	1,000 Talk Minutes + 1,000 Text Messages	\$29.99
100 Text	100 Text Messages	\$2.99
300 Text	300 Text Messages	\$4.99
500 Text	500 Text Messages	\$7.99
1,000 Text	1,000 Text Messages	\$12.99

The monthly allocation of messages does not include international texts, picture messaging and voicemail messages. In addition to the service package minutes described above,

the Company's Lifeline service packages all include free, E911-capable wireless handsets and the value-added features of Voicemail, Caller-ID and Call Waiting. Subscribers are not required to pay any initial connection fees.

II. AMERICAN BROADBAND'S REQUEST FOR LIMITED ETC DESIGNATION

Petitioner seeks ETC designation in Kentucky solely for the purpose of receiving federal universal service Lifeline support. The Company does not seek certification for high cost support nor does it seek to participate in any Kentucky universal service programs or serve rural areas. A grant of American Broadband's request for limited ETC designation is in the public interest as it will advance the FCC's goals of ensuring that low-income consumers have access to quality telecommunications services at affordable rates. Lifeline subscribers in Kentucky will have access to American Broadband's generous packages of service minutes and features. By designating the Company as an ETC, Kentucky consumers also will benefit from the increased availability and variety of Lifeline service offerings.

A. The Commission Has Authority to Designate American Broadband as an ETC

Section 214(e)(2) of the Act authorizes state public utility commissions to designate entities as ETCs upon request.⁴ Pursuant to section 214(e)(2), upon request and consistent with the public interest, convenience and necessity, state commissions may, in the case of areas served by rural ILECs and shall in all other areas, designate an entity as an ETC for a service area designated by the Commission.⁵ Specifically, Section 214(e)(2) of the Act provides that the Commission shall, except in an area served by a rural telephone company, designate more than one common carrier as an ETC, provided the requesting carrier satisfies the

⁴ 47 U.S.C. § 214(e)(1).

⁵ 47 U.S.C. § 214(e)(2).

requirements of Section 214(e)(1), and (i) offers services that are supported by federal universal service support mechanisms, and (ii) advertises the availability of such services. The FCC and Commission may impose additional requirements for carriers requesting designation an ETC providers. As discussed in greater detail below, American Broadband satisfies all ETC designation requirements.

B. American Broadband Requests Designation as an ETC in the Non-Rural Service Areas of AT&T Kentucky, Windstream Kentucky East and West, and Cincinnati Bell, and where Sprint PCS Provided Wireless Coverage

The Company seeks ETC designation in the geographic areas (i) in the AT&T Kentucky, Windstream Kentucky East and West, and Cincinnati Bell exchanges consisting of non-rural wire centers, and (ii) where Sprint PCS provides wireless coverage in Kentucky.⁶ A proposed list of exchanges and service coverage is attached to this Petition as Exhibit B. American Broadband does not request ETC designation in any areas served by rural ILECs and its proposed service area only includes non-rural wire centers.

Sections 214(e)(2) and 214(e)(5) of the Act permit state commissions to designate the service area to be served by an ETC.⁷ In addition, 47 C.F.R. § 54.207(a) defines “service area” as a “geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms.” The applicable FCC rules do not impose any restrictions on how a state commission defines an ETC’s service areas in areas served by non-rural carriers. Accordingly, the Commission has authority to define American Broadband’s ETC service areas as proposed by the Company as described above. American Broadband

⁶ American Broadband will be providing its wireless services by reselling the services of Sprint PCS so the Company’s service areas will necessarily be limited to the areas served by those carriers. As a result, the service area will be the overlap of the non-rural service areas of AT&T Kentucky, Windstream Kentucky East and West, and Cincinnati Bell and the service area of Sprint PCS in Kentucky.

⁷ 47 U.S.C. §§ 214(e)(2), (e)(5).

requests the Commission designate the Company as a prepaid wireless ETC provider in the non-rural wire centers identified above so that it can low-cost support to consumers throughout its service area in Kentucky.

III. AMERICAN BROADBAND SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC IN KENTUCKY

American Broadband satisfies the requirements of Section 214(e)(2) by fulfilling all of the requirements of Section 214(e)(1). American Broadband requests designation as a prepaid wireless provider in Kentucky.

Section 214(e)(1) requires an entity seeking ETC designation to: (i) be a common carrier; (ii) provide services supported by the USF using its own facilities or a combination of its own facilities and the resale of another carrier's facilities; and (iii) to advertise the availability of the services using media of general distribution.⁸ The FCC has identified additional ETC requirements, as set forth in 47 C.F.R. § 54.101, relating to subscriber eligibility and verification procedures,⁹ consumer protection and service quality standards,¹⁰ financial and technical capabilities¹¹ and the ability to remain functional in emergency situations.¹² As discussed in further detail below, American Broadband meets statutory and regulatory qualifications.

A. American Broadband Is a Carrier

Petitioner provides prepaid resold wireless telecommunications services. The FCC has ruled that providers of wireless services are appropriately treated as common carriers for regulatory purposes. Section 332(c)(1)(A) of the Act also states that commercial mobile

⁸ 47 U.S.C. § 214(e)(1).

⁹ 47 C.F.R. § 54.410.

¹⁰ 47 U.S.C. § 54.202(a)(3).

¹¹ 47 C.F.R. § 54.202(a)(4).

¹² 47 C.F.R. § 54.202(a)(2).

radio service (“CMRS”) providers are to be treated as common carriers. The Company provides CMRS services and, accordingly, is a common carrier.

B. The FCC Granted Blanket Forbearance from the Section 214(e)(1) “Own Facilities” Requirements

American Broadband is aware that Section 214(e)(1)(A) of the Act requires ETCs to provide Lifeline services “using its own facilities or a combination of its own facilities and resale of another carrier’s services.”¹³ The Company provides its wireline services using a combination of its own facilities and the resale of other carrier services, but provides its wireless services by reselling the services of Sprint PCS. In its *Lifeline Reform Order*, the FCC granted blanket forbearance from the “own facilities” requirement, subject to certain compliance obligations, to ETC applicants seeking limited ETC designation to participate in the Lifeline program.¹⁴ The *Lifeline Reform Order* requires ETC applicants to provide 911 and E911 service regardless of service activation status or number of prepaid minutes remaining, provide E911-compliant handsets and replace noncompliant handsets at no charge to customers.¹⁵ In addition, applicants must file and have approved by the FCC, a compliance plan detailing the applicant’s service offering and identifying measures the applicant will take to implement the requirements of the *Lifeline Reform Order*.¹⁶ American Broadband is committed to complying with these forbearance conditions. In May 2012, the Company’s Compliance Plan was approved by the

¹³ 47 U.S.C. § 214(e)(1)(A).

¹⁴ 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*, FCC 12-11, ¶ 368 (Feb. 6, 2012) (“*Lifeline Reform Order*”).

¹⁵ *Lifeline Reform Order*, ¶ 373.

¹⁶ *Lifeline Reform Order*, ¶ 368.

FCC.¹⁷ A copy of the Compliance Plan and FCC approval is attached hereto as Exhibit C. Accordingly, Petitioner's provision of wireless service by reselling the services of Sprint PCS is in accordance with the FCC's ETC requirements.

C. American Broadband Will Provide The Supported Lifeline Services

The FCC has identified the following services that are supported by the federal USF program and which must be offered by an ETC:

- Voice grade access to the public switched network;
- Local usage;
- Access to emergency services; and
- Toll limitation for qualifying low-income consumers, if applicable to future services.

In accordance with section 54.202(a)(1)(i) of the FCC's rules, American Broadband certifies that it will provide the required services, as described in detail below, throughout its designated service areas, upon receiving ETC designation. The Company will provide the following supported services:

Voice Grade Access

The FCC has described voice grade access as the ability to initiate and receive voice calls within specified frequencies and bandwidths.¹⁸ 47 C.F.R. § 54.101(a)(1) defines "Voice grade access" as "a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an

¹⁷ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, Public Notice, DA 12-828 (May 25, 2012).

¹⁸ *See, e.g., In re: Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, 8810-11 (1997).

incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.”

American Broadband will be providing voice grade access service by reselling the wireless services of Sprint PCS to low-income consumers in the Company’s designated service area, satisfying 47 C.F.R. § 54.101(a)(1). American Broadband will be able to make and receive calls on the public switched telephone network with a bandwidth of, at a minimum, 300 to 3,000 Hertz, and commits to responding to reasonable requests for service.

Local Usage

The FCC’s rules require ETCs to show that their proposed local usage plans are comparable to the usage levels provided by the ILEC in the same designated area.¹⁹ The FCC does not require an ETC’s local usage to be *identical* to the usage offered by ILECs. Moreover, when determining the comparability of the local usage plans, the Commission is to conduct a case-by-case review and consider factors such as value-added capabilities and other services included within a service plan.

As described in Section I.C., *supra*, American Broadband offers a wireless Lifeline service package where eligible customers receive 250 talk and 250 texts per month, where the plan renews on a monthly basis. The Plan also includes a free cell phone, caller ID, call waiting, 3-way calling, voicemail. There is no monthly bill or contract, and no money down required. The minutes in the service offerings can be used for domestic long distance service at no additional per minute charge and customers can purchase bundles of additional minutes of use at affordable rates. American Broadband’s included minutes of use and standard additional service features are comparable to those provided by AT&T Kentucky, Windstream Kentucky

¹⁹ See, e.g., *Lifeline Reform Order*, ¶ 46.

East and West, and Cincinnati Bell, in American Broadband's requested designated service area satisfying 47 C.F.R. § 54.101(a)(2).

The FCC has not adopted minimum local usage requirements. If designated as an ETC, American Broadband will comply with any applicable minimum usage requirements adopted by the FCC in the future.²⁰

Access to emergency services

American Broadband recognizes the importance of ensuring consumers have access to emergency services and intends to provide its subscribers with access to 911 and E911.

47 C.F.R. § 54.101(a)(5) defines "Access to emergency services" as including access to services, such as 911 and enhanced 911, to the extent provided by local governments or other public safety organizations. Section 20.18(m) of the FCC's rules provide that wireless resellers are required to provide E911 service only to the extent that the underlying facilities-based carrier has deployed the facilities necessary to deliver E911 information to the public safety answering point ("PSAP").²¹

American Broadband will provide its Lifeline subscribers with access to 911 and E911 services to the extent Sprint PCS has deployed the necessary facilities, and is capable of delivering automatic numbering information ("ANI") and automatic location information ("ALI") to customers. Petitioner will provide access to emergency service in accordance with the FCC's rules. The Company's subscribers can call emergency services free of charge and will always have access to emergency services regardless of the service activation status or the number of remaining minutes of service, and will satisfy all applicable state and federal E-911 requirements. Petitioner will also pay all applicable E-911 fees in a timely manner and work

²⁰ See, e.g., *Lifeline Reform Order*, ¶ 50.

²¹ 47 C.F.R. § 20.18(m).

with local PSAPs within its ETC service area to make 911 and E-911 service available to its customers.

Toll limitation services for qualifying low-income consumers

47 C.F.R. § 54.101(a)(9) requires toll limitation or toll blocking for qualifying low-income consumers as a means of limiting or blocking out-going toll calls (“TLS”). However, an ETC is not required to provide toll control or toll blocking if it is incapable of providing such service.

American Broadband treats the minutes included in its Lifeline plans as any distance minutes and does not assess separate charges for toll services. The prepaid nature of the Company’s service prevents consumers from using service in excess of their prepaid amounts.

In addition, pursuant to the *Lifeline Reform Order*, subscribers to such all-distance services are not considered to have voluntarily elected to receive TLS.²² Consequently, Petitioner’s Lifeline subscribers are not subject to termination of services due to unpaid charges for toll services. Should American Broadband begin offering Lifeline services that distinguish between local and toll usage, the Company will offer TLS to its subscribers in accordance with section 214(e)(1)(B) of the Act, and the Commission and FCC’s requirements.

Additional Supported Services

47 C.F.R. § 54.101(a)(3) requires dual tone multi-frequency (“DTMF”) through the ETC’s network, shortening call set-up time. However, for wireless carriers, it “is appropriate to support out-of band signaling mechanisms as an alternative to DTMF signaling.”²³ American Broadband uses out-of-band signaling. American Broadband also satisfies 47 C.F.R. § 54.101(a)(4) and (7) because, as a wireless telecommunications carrier, the Company’s

²³ *Federal-State Joint Bd. On Universal Srv.*, Report and Order, 12 FCC Rcd 8776, ¶ 71 (1997).

²³ *Federal-State Joint Bd. On Universal Srv.*, Report and Order, 12 FCC Rcd 8776, ¶ 71 (1997).

underlying network provides a dedicated message path for the length of a user's particular transmission and provides all its customers with the ability to make and receive interexchange or toll calls throughout its network.

In addition, American Broadband meets the requirements of 47 C.F.R. § 54.101(a)(6) and § 54.101(a)(8) by providing access to operator services and directory assistance. With respect to billing questions, an American Broadband customer may dial "611", and to access directory listings with call completion, an American Broadband customer may dial "411".

D. American Broadband Will Advertise the Availability of Its Lifeline Services

Section 214(e)(1)(B) of the Act requires ETCs to advertise the availability of their Lifeline service offerings and the charges for those services.²⁴ The FCC's revised rule 54.405(b) requires ETCs to publicize the availability of their service in a means calculated to reach consumers that might qualify for Lifeline services.²⁵

American Broadband is committed to ensuring all low income consumers are aware of the benefits of the Lifeline program and the Company's Lifeline service offerings, and that the Company's advertisement of the Lifeline program complies with all requirements. The Company will comply with all of the FCC's and Commission's rules regarding the advertising of these services.²⁶

American Broadband will advertise its Lifeline service offerings in media of general distribution, that may include radio, newspapers and the Internet, in order to reach those

²⁴ 47 U.S.C. § 214(e)(1)(B). *See also* 47 C.F.R. § 54.201(d)(2).

²⁵ 47 C.F.R. § 54.405(b).

²⁶ *See, e.g.*, 47 C.F.R. § 54.405(b).

low-income consumers that may qualify for the program. The Company also may utilize additional means to directly target low income consumers. These supplemental advertising methods include distributing the Company's brochures at state-wide and local social service agencies and events, such as outreach events at government-subsidized housing communities, and partnering with nonprofit assistance organizations, such as Habitat for Humanity, to ensure low-income consumers are aware of the Company's Lifeline service offerings.

The Company's Lifeline service advertisements will comply with the FCC's rules regarding the information to be included in such advertisements. American Broadband's advertisements will comply with the FCC rule section 54.405(c) notice requirements. Specifically, the Company's advertisements will, in easily understood language, inform consumers that: (i) the Company's services are Lifeline services; (ii) Lifeline is a government assistance program; (iii) the Company's Lifeline service may not be transferred to other individuals; (iv) consumers must meet certain eligibility requirements to enroll in the Lifeline program; (v) the Lifeline program is limited to one discount per household; (vi) documentation is required to qualify consumers for the program; and (vii) American Broadband provides the service. The Company's application form will state that consumers that willfully make false statements on their Lifeline service applications in order to obtain Lifeline benefits can be punished by a fine or imprisonment or can be barred from the program.²⁷ American Broadband's Compliance Plan contains an example of the type of advertising materials the Company intends to use in Kentucky.

²⁷ 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 Nos. 11-42, 03-109, 12-23, CC Docket No. 96-45, Erratum, ¶ 63 (rel. May 16, 2012).

E. The Company Will Comply with the Additional ETC Obligations

In addition to the ETC requirements described above, the FCC adopted additional service obligations for ETCs. As discussed below, American Broadband satisfies and will comply with these requirements.

The Company will comply with the FCC's customer verification and certification requirements.

Petitioner is aware that the FCC has adopted new requirements regarding the certification and verification of a customer's qualifications for participation in the Lifeline program. As described in greater detail in the Company's Compliance Plan, attached hereto as Exhibit C, the Company has implemented specific procedures to comply with the customer certification and verification requirements as well as the requirements addressing de-enrollment and duplication of service. These procedures comply with the FCC's revised verification and certification rules.²⁸ The Company also will comply with the FCC's annual certification and reporting requirements and the FCC's measures to address fraud, waste and abuse in the Lifeline program.²⁹

American Broadband is able to remain functional in emergency situations.

As discussed in section III.B, supra, American Broadband will provide its wireless services by reselling the services of Sprint PCS. Consequently, the Company has access to the significant and well-established networks and facilities of both carriers. Petitioner believes the Sprint PCS network is capable of managing the increased traffic that may occur during emergency situations and rerouting traffic to avoid damaged facilities. It is the Company's

²⁸ See 47 C.F.R. § 54.410.

²⁹ 47 C.F.R. §§ 54.416, 54.422. See also *In re: Telecommunications Carriers Eligible for Universal Service Support; Virgin Mobile USA, L.P. Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, et. al.*, 25 FCC Rcd 17797, ¶ 24 (2010) ("2010 Virgin Mobile ETC Order").

understanding that Sprint PCS has access to sufficient back-up power to ensure continued functionality in the event of a power outage, satisfying the requirements of 47 C.F.R. § 54.202(a)(2).

The Company will satisfy applicable consumer protection and service quality standards.

American Broadband is committed to providing its Lifeline subscribers with quality services and complying with applicable consumer protection requirements. Section 54.202(a)(3) of the FCC's rules provides that a wireless ETC applicant's agreement to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy the FCC's consumer protection and service quality requirements.³⁰ American Broadband voluntarily agrees to comply with the CTIA Consumer Code.

American Broadband has the financial and technical capability to provide Lifeline services in compliance with the FCC's rules.

FCC rule 54.202(a)(4) requires ETC applicants to demonstrate they have the technical and financial capability to provide ETC services in compliance with the FCC's rules.³¹ When determining if an ETC petitioner possesses these qualifications, the FCC considers factors including (i) the carrier's prior offering of telecommunications service to non-Lifeline subscribers; (ii) whether the carrier relies exclusively on Lifeline service revenues; (iii) the length of time the petitioner has been in business; (iv) whether the carrier has outside revenues; and (v) whether the applicant has been the subject of any FCC enforcement action or ETC revocation proceeding.

³⁰ 47 C.F.R. § 54.202(a)(3).

³¹ 47 C.F.R. § 54.202(a)(4)

As discussed in section I.A., American Broadband is an experienced and financially secure telecommunications carrier and will be able to provide its Lifeline services in accordance with the FCC's rules. Petitioner has operated as a telecommunications carrier since 2004 and serves more than 35,000 subscribers, including 10,000 wireless subscribers nationally. The Company has been operating as a certificated telecommunications carrier for several years in Indiana, Michigan, Ohio, West Virginia, and Wisconsin and more recently in Illinois. American Broadband filed its tariffs in Kentucky in December 2012. In each of those states, the Company was able to demonstrate it possessed the qualifications necessary to obtain a certificate to provide telecommunications services. In addition to being a certificated service provider, Petitioner also has met the standards necessary to receive authorization as an ETC in the states of Indiana, Michigan, Ohio, Wisconsin, and West Virginia. Moreover, the Company's managers have in excess of 50 aggregate years of experience in the telecommunications industry. Consequently, the Company has the technical capability necessary to qualify for ETC designation.

American Broadband also is financially capable of providing the required Lifeline services. The Company has operated profitably as a telecommunications carrier for several years and has never had to file for bankruptcy protection. Moreover, Petitioner's Lifeline service business represents only a small percentage of the company's overall revenues so the Company is not dependent on the revenues from the Lifeline services. American Broadband makes sure to expand its business in a measured manner to prevent overextension of the Company's financial or technical capabilities. Consequently, American Broadband is financially secure and has the financial resources necessary to provide its Lifeline services in accordance with the FCC's requirements. As previously noted, the Company has received ETC designations in Indiana,

Michigan, Ohio, West Virginia and Wisconsin, and those ETC designations have not been subject to any revocation actions. The Company has not been the subject of any FCC enforcement actions.

American Broadband Will Provide Service Upon Reasonable Request And Certifies The Possibility Of Equal Access.

American Broadband commits to providing service throughout its proposed designated service area to all customers making a reasonable request for service. American Broadband certifies that it will provide service on a timely basis to requesting customers within its designated ETC service area and, if the potential customer is within the Company's designated service area but outside its existing network coverage, in accordance with the factors detailed in 47 C.F.R. § 54.202(a)(1).

In addition, American Broadband acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

Local Usage Plan

Pursuant to 47 C.F.R. § 54.202(a)(5), American Broadband submits the following information, and the information in Section I.C supra, regarding the terms and conditions of voice telephony plans American Broadband will offer to Lifeline subscribers. American Broadband offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation. The Company's Lifeline service package, described above, offers 250 anytime voice minutes and 250 texts per month for \$9.25 (which after a Lifeline credit equates to no charge to the eligible customer), where the plan renews on a monthly basis. The Plan also includes a free cell phone, caller ID, call waiting, 3-way calling, voicemail. There is no monthly bill or contract, and no money down required. Each of these

plans can be used for local services. Finally, American Broadband will not collect service deposits for its plans and will not charge a number-portability fee, including for Lifeline accounts.³² The Company will timely pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees.

Annual Reporting Requirements

American Broadband commits to complying with annual reporting requirements, including reporting the number of complaint per 1,000 handsets and the information detailing how many requests for service from potential customers were unfulfilled for the past year if requested by the Commission.³³

IV. DESIGNATION OF AMERICAN BROADBAND IS IN THE PUBLIC INTEREST

By designating American Broadband as a wireless ETC, the Commission will be advancing the Act's goal of ensuring universal access to quality telecommunications services at affordable rates.³⁴ The FCC's rules require that a request for ETC designation may be granted only upon a finding that grant of the designation will be in the public interest.³⁵ When evaluating if an ETC designation would be in the public interest, the FCC considers the "benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering."³⁶ As explained in greater detail below, designation of American Broadband as

³² 47 C.F.R. § 54.401(c), (e).

³³ See 47 C.F.R. §54.422; Case No. 2003-00143, Petition of NPCR, Inc. d/b/a Nextel Partners for Designation as an Eligible Telecommunications Carrier in the State of Kentucky (Dec. 16, 2004).

³⁴ 47 U.S.C. § 254(b)(1),(3).

³⁵ 47 C.F.R. § 54.202(b).

³⁶ See e.g., 2010 Virgin Mobile ETC Order, 25 FCC Rcd 17797, ¶ 6.

a wireless ETC will increase the number of Lifeline service providers in Kentucky and provide low income consumers with access to the Company's attractive and affordable service offerings.

One of American Broadband's primary objectives is to provide quality wireless telecommunications services to low income and underserved consumers throughout the Company's designated service areas in Kentucky. To this end, the Company has developed a number of attractive service offerings and use policies that increase access by low income consumers to quality services. The Company recognizes that low income consumers often lack access to the credit required to secure traditional post-paid telephone service. Petitioner alleviates this barrier by permitting consumers to obtain service without conducting a credit check or requiring long term contract commitments. The prepaid nature of the Company's service enables consumers to control their communications costs and avoids unexpected charges resulting from unplanned usage.

As with any consumer, low income consumers need reliable and affordable means of staying in contact – whether with family, friends, employers or others. Once designated as an ETC, Petitioner will be able to address these low income consumers' needs with its wireless Lifeline service offerings that include generous numbers of minutes of use and service features, all offered at affordable rates. The generous number of included service minutes enable low income consumers to stay in contact with employers without sacrificing the ability to remain in contact with friends and family members.

Low income consumers also would have access to 911 and E911 services, regardless of the number of minutes the customer has remaining, and thus can reach emergency services when needed. The mobile nature of American Broadband's service is especially helpful to those low-income consumers that may frequently change residences or work in migratory

jobs. The Company's wireless services provide low income consumers with a stable number at which they can be contacted regardless of where they are located at the time. American Broadband's Lifeline service offerings will provide low income consumers in Kentucky with another alternative for obtaining quality telecommunications service. The Company's presence in the telecommunications market likely will prompt other carriers to increase and improve their Lifeline service offerings, thereby benefiting consumers in Kentucky.

V. ANTI-DRUG ABUSE CERTIFICATION


In accordance with section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, American Broadband certifies that no party to the Petition is subject to denial of federal benefits, including FCC benefits.

VI. CONCLUSION

For the forgoing reasons, American Broadband satisfies the requirements for designation as a prepaid wireless ETC. Petitioner respectfully requests the Commission expeditiously grant limited ETC status to the Company for the purpose of receiving federal support and reimbursement for the Company's provision of prepaid wireless telecommunications services to qualified low income consumers.

May 1, 2013

Respectfully Submitted,



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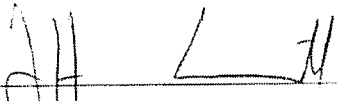
*Counsel to American Broadband and
Telecommunications Company*

DECLARATION

STATE OF _____
COUNTY OF _____

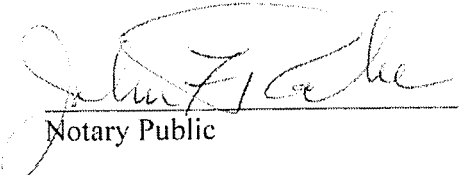
§
§
§

I, Jeffrey S. Ansted, do hereby affirm under penalty of perjury that I am President of American Broadband and Telecommunications Company ("American Broadband"), the petitioner in the foregoing document; that I am authorized to issue this Declaration on behalf of American Broadband; that I have read the foregoing document; and that the statements in the foregoing document with respect to American Broadband are true and correct to the best of my knowledge, information and belief.

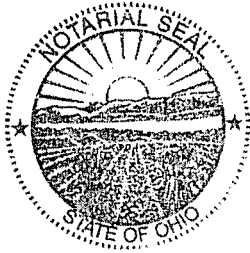


Jeffrey Ansted
President

Subscribed and sworn to before me this 25th day of April, 2013.



Notary Public



JOHN F. ROCHE
Notary Public
In and for the State of Ohio
My Commission Expires
September 21, 2014

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

_____)	
In the Matter of)	
)	
American Broadband And)	
Telecommunications Company)	Case No. _____
)	
Petition For Limited Designation)	
As An Eligible Wireless)	
Telecommunications Carrier)	
_____)	

EXHIBIT A

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

_____)
In the Matter of)
)
American Broadband And)
Telecommunications Company)
)
Petition For Limited Designation)
As An Eligible Wireless)
Telecommunications Carrier)
_____)

Case No. _____

EXHIBIT B

<u>NPA</u>	<u>NXX</u>	<u>Name</u>	<u>Rate Center</u>	<u>State</u>
270	253	AT&T LOCAL	FRANKLIN	KY
270	288	AT&T LOCAL	MORGANTOWN	KY
270	296	AT&T LOCAL	LEITCHFLD	KY
270	356	AT&T LOCAL	MAYFIELD	KY
270	359	AT&T LOCAL	OWENSBORO	KY
270	438	AT&T LOCAL	BOWLNGGREN	KY
270	709	AT&T LOCAL	PADUCAH	KY
502	219	AT&T LOCAL	FRANKFORT	KY
502	301	AT&T LOCAL	LOUISVILLE	KY
502	318	AT&T LOCAL	LOUISVILLE	KY
502	322	AT&T LOCAL	LOUISVILLE	KY
502	370	AT&T LOCAL	GEORGETOWN	KY
502	508	AT&T LOCAL	LOUISVILLE	KY
502	547	AT&T LOCAL	NEWLIBERTY	KY
502	563	AT&T LOCAL	OWENTON	KY
859	212	AT&T LOCAL	BOONE	KY
859	377	AT&T LOCAL	PARIS	KY
859	825	AT&T LOCAL	LEXINGTON	KY
270	203	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
270	204	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
270	221	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RUSSELLVL	KY
270	229	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	W LOUISVL	KY
270	232	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CENTERTOWN	KY
270	233	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESVL	KY
270	235	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GRACEY	KY
270	236	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HICKMAN	KY
270	238	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BESSIEBEND	KY
270	247	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MAYFIELD	KY
270	249	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEBO	KY
270	251	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MAYFIELD	KY
270	252	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BENTON	KY
270	257	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCDANIELS	KY
270	258	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORTONSGAP	KY
270	264	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MACEO	KY
270	265	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELKTON	KY
270	269	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLUFF SPG	KY
270	271	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LA FAYETTE	KY
270	273	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CALHOUN	KY
270	274	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BEAVER DAM	KY
270	275	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PLEASATRDG	KY
270	276	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FORDSVILLE	KY
270	277	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHARON GRV	KY
270	278	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LIVERMORE	KY
270	281	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ENSOR	KY
270	298	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARTFORD	KY
270	322	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HANSON	KY
270	326	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL	KY
270	333	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STURGIS	KY
270	338	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENVILLE	KY
270	355	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WATER VLY	KY
270	362	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GILBERTSVL	KY
270	365	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRINCETON	KY
270	377	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENVILLE	KY
270	383	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EARLINGTON	KY
270	388	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EDDYVILLE	KY
270	389	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORGANFLD	KY
270	393	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	412	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OAK GROVE	KY
270	415	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH	KY
270	417	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWENSBORO	KY
270	424	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CROFTON	KY
270	439	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OAK GROVE	KY

270	441 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH	KY
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270	443 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH	KY
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270	466 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TRENTON	KY
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270	472 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FULTON	KY
270	474 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AURORA	KY
270	475 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PEMBROKE	KY
270	476 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DRAKESBORO	KY
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270	486 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ISLAND	KY
270	521 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROBARDS	KY
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270	533 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORYDON	KY
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270	546 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HEBBARDSVL	KY
270	554 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH	KY
270	575 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH	KY
270	586 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKLIN	KY
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270	639 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DIXON	KY
270	640 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OAK GROVE	KY
270	653 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLINTON	KY
270	662 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORGANTOWN	KY
270	664 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLAY	KY
270	667 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PROVIDENCE	KY
270	669 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ST CHARLES	KY
270	676 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NORTONVL	KY
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270	725 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RUSSELLVL	KY
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270	731 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RUSSELLVL	KY
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270	754 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CENTRAL CY	KY
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270	759 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MURRAY	KY
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270	767 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MURRAY	KY
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270	777 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	780 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
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270	785 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PANTHER	KY
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270	793 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	796 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	797 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DAWSON SPG	KY
270	798 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OAK GROVE	KY
270	809 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MURRAY	KY
270	821 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL	KY
270	824 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL	KY
270	825 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL	KY
270	826 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON	KY
270	827 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON	KY
270	830 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON	KY
270	831 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON	KY
270	835 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SEBREE	KY
270	838 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CAYCE	KY
270	842 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	843 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	844 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON	KY
270	846 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	851 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SYMSONIA	KY
270	852 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWENSBORO	KY
270	869 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON	KY
270	881 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL	KY
270	883 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JORDAN	KY
270	884 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLAUGHTERS	KY
270	885 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL	KY
270	886 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL	KY
270	887 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL	KY
270	889 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL	KY
270	890 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL	KY
270	898 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH	KY
270	901 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	924 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CANTON	KY
270	926 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWENSBORO	KY
270	927 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HAWESVILLE	KY
270	935 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	936 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN	KY
270	956 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OAK GROVE	KY
270	965 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MARION	KY
502	204 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
502	209 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	217 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	222 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LA GRANGE	KY
502	223 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	225 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LA GRANGE	KY
502	226 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	227 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	228 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	231 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	238 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	239 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	240 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	241 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	243 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	244 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY

502	762 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	772 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	774 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	775 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	776 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	778 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	779 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	782 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	799 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROSETRRACE	KY
502	809 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	810 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	829 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WADDY	KY
502	833 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEBANONJCT	KY
502	834 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FINCHVILLE	KY
502	839 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAWRENCEBG	KY
502	844 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHELBYVL	KY
502	845 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMINENCE	KY
502	848 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	852 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	854 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	857 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SADIEVILLE	KY
502	859 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAWRENCEBG	KY
502	863 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GEORGETOWN	KY
502	867 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GEORGETOWN	KY
502	868 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GEORGETOWN	KY
502	873 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	874 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	875 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT	KY
502	878 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMINENCE	KY
502	891 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	893 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	894 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	895 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	896 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	897 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	899 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	922 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WEST POINT	KY
502	928 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	933 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	935 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	937 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	942 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROSETRRACE	KY
502	943 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROSETRRACE	KY
502	947 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PORT ROYAL	KY
502	961 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	962 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	963 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	964 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	966 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	968 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	969 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	993 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
502	995 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
606	218 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE	KY
606	237 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SOWILLIMSN	KY
606	242 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MIDDLESBO	KY
606	246 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MIDDLESBO	KY
606	248 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MIDDLESBO	KY
606	258 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORBIN	KY
606	285 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MARTIN	KY
606	296 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PINEVILLE	KY
606	298 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	INEZ	KY
606	337 BELL SOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PINEVILLE	KY

606	353 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STONE	KY
606	355 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRAB ORCH	KY
606	358 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WAYLAND	KY
606	365 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANFORD	KY
606	377 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCDOWELL	KY
606	395 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WARFIELD	KY
606	427 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCCARR	KY
606	432 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE	KY
606	433 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE	KY
606	437 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE	KY
606	456 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FREEBURN	KY
606	464 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BEATTYVL	KY
606	502 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE	KY
606	523 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORBIN	KY
606	526 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORBIN	KY
606	528 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORBIN	KY
606	539 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLIAMSBG	KY
606	549 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLIAMSBG	KY
606	555 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
606	563 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MAYSVILLE	KY
606	564 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MAYSVILLE	KY
606	573 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARLAN	KY
606	574 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARLAN	KY
606	631 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE	KY
606	632 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESBURG	KY
606	633 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESBURG	KY
606	638 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISA	KY
606	639 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	VIRGIE	KY
606	663 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANTON	KY
606	664 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WALLINSCRK	KY
606	666 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JACKSON	KY
606	693 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JACKSON	KY
606	700 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL		KY
606	754 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELKHORN CY	KY
606	786 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JELICO	KY
606	788 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PAINTSVL	KY
606	789 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PAINTSVL	KY
606	835 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FEDSCREEK	KY
606	848 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BENHAMLNCH	KY
606	855 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEON	KY
606	874 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ALLEN	KY
606	886 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRESTONSBG	KY
606	889 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRESTONSBG	KY
606	991 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
606	992 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
606	993 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
606	994 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
606	998 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	XXXXXXXXXX	KY
859	234 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CYNTHIANA	KY
859	235 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CYNTHIANA	KY
859	236 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DANVILLE	KY
859	238 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DANVILLE	KY
859	239 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DANVILLE	KY
859	262 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MACKVILLE	KY
859	284 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MOORESVL	KY
859	289 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CARLISLE	KY
859	328 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	KIRKSVILLE	KY
859	332 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PERRYVILLE	KY
859	336 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGFLD	KY
859	362 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NOMIDDLETN	KY
859	366 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORNISHVL	KY
859	369 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WACO	KY
859	375 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLISBURG	KY

859	383 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LITTLEROCK	KY
859	387 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	484 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MILLERBURG	KY
859	497 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTSTERLING	KY
859	498 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTSTERLING	KY
859	499 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTSTERLING	KY
859	527 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FORD	KY
859	555 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE	KY
859	622 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	623 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	624 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	625 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	626 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	700 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL		KY
859	733 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARRODSBG	KY
859	734 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARRODSBG	KY
859	737 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER	KY
859	744 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER	KY
859	745 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER	KY
859	748 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BURGIN	KY
859	779 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND	KY
859	842 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER	KY
859	854 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JUNCTIONCY	KY
859	865 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SALVISA	KY
859	901 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER	KY
859	936 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DANVILLE	KY
859	987 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PARIS	KY
859	988 BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PARIS	KY
270	201 NEXTEL COMMUNICATIONS, INC.	PADUCAH	KY
270	222 NEXTEL COMMUNICATIONS, INC.	OWENSBORO	KY
270	268 NEXTEL COMMUNICATIONS, INC.	ELIZABHTN	KY
270	392 NEXTEL COMMUNICATIONS, INC.	BOWLINGGREN	KY
270	507 NEXTEL COMMUNICATIONS, INC.	RUSSELLSPG	KY
270	584 NEXTEL COMMUNICATIONS, INC.	MADISONVL	KY
270	602 NEXTEL COMMUNICATIONS, INC.	DRAKESBORO	KY
270	805 NEXTEL COMMUNICATIONS, INC.	COLUMBIA	KY
270	834 NEXTEL COMMUNICATIONS, INC.	GLASGOW	KY
270	850 NEXTEL COMMUNICATIONS, INC.	FRANKLIN	KY
270	868 NEXTEL COMMUNICATIONS, INC.	LEITCHFLD	KY
270	893 NEXTEL COMMUNICATIONS, INC.	RUSSELLVL	KY
270	957 NEXTEL COMMUNICATIONS, INC.	HENDERSON	KY
270	984 NEXTEL COMMUNICATIONS, INC.	OAK GROVE	KY
270	985 NEXTEL COMMUNICATIONS, INC.	HOPKINSVL	KY
270	998 NEXTEL COMMUNICATIONS, INC.	BRANDENBG	KY
502	220 NEXTEL COMMUNICATIONS, INC.	SHELBYVL	KY
502	249 NEXTEL COMMUNICATIONS, INC.	BARDESTOWN	KY
502	269 NEXTEL COMMUNICATIONS, INC.	LA GRANGE	KY
502	376 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
502	480 NEXTEL COMMUNICATIONS, INC.	CARROLLTON	KY
502	482 NEXTEL COMMUNICATIONS, INC.	OWENTON	KY
502	618 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
502	639 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
502	643 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
502	664 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
502	680 NEXTEL COMMUNICATIONS, INC.	LAWRENCEBG	KY
502	717 NEXTEL COMMUNICATIONS, INC.	WEST POINT	KY
502	773 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
502	803 NEXTEL COMMUNICATIONS, INC.	FRANKFORT	KY
502	817 NEXTEL COMMUNICATIONS, INC.	LOUISVILLE	KY
606	215 NEXTEL COMMUNICATIONS, INC.	CORBIN	KY
606	232 NEXTEL COMMUNICATIONS, INC.	ASHLAND	KY
606	255 NEXTEL COMMUNICATIONS, INC.	GRAYSON	KY
606	271 NEXTEL COMMUNICATIONS, INC.	SOMERSET	KY

606	278 NEXTEL COMMUNICATIONS, INC.	MONTICELLO	KY
606	391 NEXTEL COMMUNICATIONS, INC.	MANCHESTER	KY
606	462 NEXTEL COMMUNICATIONS, INC.	MOREHEAD	KY
606	622 NEXTEL COMMUNICATIONS, INC.	BARBOURVL	KY
606	661 NEXTEL COMMUNICATIONS, INC.	STANFORD	KY
606	682 NEXTEL COMMUNICATIONS, INC.	LONDON	KY
859	265 NEXTEL COMMUNICATIONS, INC.	HARRODSBG	KY
859	298 NEXTEL COMMUNICATIONS, INC.	CYNTHIANA	KY
859	326 NEXTEL COMMUNICATIONS, INC.	DANVILLE	KY
859	340 NEXTEL COMMUNICATIONS, INC.	PARIS	KY
859	393 NEXTEL COMMUNICATIONS, INC.	COVINGTON	KY
859	398 NEXTEL COMMUNICATIONS, INC.	MTSTERLING	KY
859	476 NEXTEL COMMUNICATIONS, INC.	MIDWAY	KY
859	509 NEXTEL COMMUNICATIONS, INC.	LEXINGTON	KY
859	621 NEXTEL COMMUNICATIONS, INC.	LEXINGTON	KY
859	661 NEXTEL COMMUNICATIONS, INC.	RICHMOND	KY
859	743 NEXTEL COMMUNICATIONS, INC.	COVINGTON	KY
859	808 NEXTEL COMMUNICATIONS, INC.	WINCHESTER	KY
859	983 NEXTEL COMMUNICATIONS, INC.	LEXINGTON	KY
859	991 NEXTEL COMMUNICATIONS, INC.	COVINGTON	KY
270	449 SPRINT COMMUNICATIONS COMPANY, L.P. - KY	PRINCETON	KY
270	819 SPRINT COMMUNICATIONS COMPANY, L.P. - KY	TOMPKINSVL	KY
606	328 SPRINT COMMUNICATIONS COMPANY, L.P. - KY	ALBANY	KY
606	519 SPRINT COMMUNICATIONS COMPANY, L.P. - KY	STONE	KY
270	226 SPRINT SPECTRUM L.P.	MURRAY	KY
270	300 SPRINT SPECTRUM L.P.	ELIZABHTN	KY
270	303 SPRINT SPECTRUM L.P.	BOWLNGGREN	KY
270	304 SPRINT SPECTRUM L.P.	ELIZABHTN	KY
270	305 SPRINT SPECTRUM L.P.	HOPKINSVL	KY
270	306 SPRINT SPECTRUM L.P.	FRANKLIN	KY
270	361 SPRINT SPECTRUM L.P.	GLASGOW	KY
270	366 SPRINT SPECTRUM L.P.	PADUCAH	KY
270	425 SPRINT SPECTRUM L.P.	DAWSON SPG	KY
270	452 SPRINT SPECTRUM L.P.	MADISONVL	KY
270	454 SPRINT SPECTRUM L.P.	HENDERSON	KY
270	485 SPRINT SPECTRUM L.P.	OWENSBORO	KY
270	504 SPRINT SPECTRUM L.P.	HARTFORD	KY
270	995 SPRINT SPECTRUM L.P.	CAMPBELSVL	KY
502	235 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	275 SPRINT SPECTRUM L.P.	BARDESTOWN	KY
502	310 SPRINT SPECTRUM L.P.	LA GRANGE	KY
502	314 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	320 SPRINT SPECTRUM L.P.	FRANKFORT	KY
502	386 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	387 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	417 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	418 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	419 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	428 SPRINT SPECTRUM L.P.	MTWASHIGTN	KY
502	435 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	442 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	457 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	471 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	472 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	500 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	529 SPRINT SPECTRUM L.P.	SHELBYVL	KY
502	598 SPRINT SPECTRUM L.P.	LAWRENCEBG	KY
502	608 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	615 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	654 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	767 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	792 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	795 SPRINT SPECTRUM L.P.	LOUISVILLE	KY

502	802 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	812 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	851 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
502	881 SPRINT SPECTRUM L.P.	LA GRANGE	KY
502	994 SPRINT SPECTRUM L.P.	LOUISVILLE	KY
606	253 SPRINT SPECTRUM L.P.	PIKEVILLE	KY
606	689 SPRINT SPECTRUM L.P.	CORBIN	KY
859	248 SPRINT SPECTRUM L.P.	RICHMOND	KY
859	249 SPRINT SPECTRUM L.P.	WINCHESTER	KY
859	303 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	312 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	329 SPRINT SPECTRUM L.P.	DANVILLE	KY
859	396 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	414 SPRINT SPECTRUM L.P.	COVINGTON	KY
859	415 SPRINT SPECTRUM L.P.	COVINGTON	KY
859	433 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	466 SPRINT SPECTRUM L.P.	COVINGTON	KY
859	492 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	552 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	612 SPRINT SPECTRUM L.P.	HARRODSBG	KY
859	644 SPRINT SPECTRUM L.P.	WINCHESTER	KY
859	686 SPRINT SPECTRUM L.P.	LEXINGTON	KY
859	816 SPRINT SPECTRUM L.P.	COVINGTON	KY
859	992 SPRINT SPECTRUM L.P.	COVINGTON	KY
606	571 SPRINT SPECTRUM L.P.- KY	ASHLAND	KY

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

_____)	
In the Matter of)	
)	
American Broadband And)	
Telecommunications Company)	Case No. _____
)	
Petition For Limited Designation)	
As An Eligible Wireless)	
Telecommunications Carrier)	
_____)	

EXHIBIT C



PUBLIC NOTICE

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

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

DA 12-828
Release Date: May 25, 2012

WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF AMERICAN BROADBAND & TELECOMMUNICATIONS, BUDGET PREPAY, CONSUMER CELLULAR, GLOBAL CONNECTION, TERRACOM AND TOTAL CALL

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves compliance plans of six telecommunications carriers: American Broadband & Telecommunications; Budget Prepay, Inc.; Consumer Cellular, Inc.; Global Connection, Inc. of America; TerraCom, Inc.; and Total Call Mobile, Inc. filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.¹

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

¹ See *Lifeline and Link Up Reform and Modernization et al*, WC Docket No.11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, at paras. 379-380 (rel. Feb. 6, 2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

² 47 U.S.C. § 214(e)(1)(A).

³ See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-93, paras. 77-78, 80 (2011) (*USF/ICC Transformation Order*); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011); *Connect America Fund*, WC Docket No. 10-90 *et al.*, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*).

⁴ See *Lifeline Reform Order*, FCC 12-11, at para. 366, App. A; *USF/ICC Transformation Order on Reconsideration* at para. 4. Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Budget PrePay, Inc. Petition for Designation as an Eligible Telecommunications Carrier, WC Docket Nos. 09-197 and 11-42, Compliance Plan of Budget PrePay, Inc. at 3 n. 6 (filed May 1, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under section 54.101 and 54.401 of the Commission’s rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

requirement, subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.⁵ Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁶

The Bureau has reviewed the compliance plans listed in the Appendix for conformance with the *Lifeline Reform Order*, and now approves those six compliance plans.⁷

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

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

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

- FCC -

⁵ See *Lifeline Reform Order*, FCC 12-11 at paras. 368-381.

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

⁷ The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. See *Lifeline Reform Order*, FCC 12-11 at paras. 50 and 387.

Appendix

Petitioner	Compliance Plans As Captioned by Petitioner	Date of Filing	Docket Numbers
American Broadband & Telecommunications	American Broadband & Telecommunications Revised Compliance Plan	April 27, 2012	09-197; 11-42
Budget PrePay, Inc.	Compliance Plan of Budget PrePay, Inc.	May 1, 2012	09-197; 11-42
Consumer Cellular, Inc.	Consumer Cellular Amended Revised Compliance Plan	April 18, 2012	09-197; 11-42
Global Connection, Inc. of America	Global Connection Inc. of America Compliance Plan	April 30, 2012	09-197; 11-42
TerraCom, Inc.	TerraCom, Inc. Second Revised Blanket Forbearance Compliance Plan	May 1, 2012	09-197; 11-42
Total Call Mobile, Inc.	Total Call, Inc. Revised Compliance Plan	May 17, 2012	09-197; 11-42

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

_____)	
In the Matter of)	
)	
Federal-State Joint Board on)	WC Docket No. 09-197
Universal Service)	
)	
Lifeline and Link Up Reform Modernization))	WC Docket No. 11-42
)	
Petition for Forbearance)	
_____)	

**AMERICAN BROADBAND & TELECOMMUNICATIONS
REVISED COMPLIANCE PLAN**

Background

On February 25, 2011, American Broadband & Telecommunications (“American Broadband” or “Company”) filed a Petition for Forbearance (“Petition”) requesting that the Federal Communications Commission (“FCC” or “Commission”) forbear from enforcement of section 214(e)(1)(A) of the Act, which requires eligible telecommunications carriers (“ETC”) to use their own facilities to provide services supported by the Universal Service Fund (“USF”). The Commission issued a Public Notice seeking comment on American Broadband & Telecommunications’ Petition and no comments opposing the Petition were filed.¹ On June 30, 2011, the Company filed its initial draft Compliance Plan outlining its proposed compliance with the usual Commission conditions for ETCs. The Commission sought comment on the Plan and the Company subsequently filed an updated draft Plan on December 2, 2011.

¹ *Wireline Competition Bureau Seeks Comments on American Broadband & Telecommunications Petition for Forbearance from Eligible Telecommunications Carrier Facilities Requirement*, Public Notice, DA 11-641 (rel April 7, 2011).

On January 31, 2012, the Commission approved several modifications to its Lifeline rules and provided blanket forbearance for non-facilities-based carriers wishing to provide Lifeline only services. In the *Lifeline Reform Order*,² the Commission noted that a carrier must comply with 911 requirements (which American Broadband already does) and file a Compliance Plan that provides specific information on the low income offerings of the carrier as well as outlining the steps the carrier will take to comply with the order, specifically with regards to the prevention of waste, fraud and abuse.³ On March 13, 2012, American Broadband filed a revised compliance plan pursuant to the *Lifeline Reform Order*. With this filing, American Broadband makes several minor revisions to the March 13 filing. Through this revision, American Broadband demonstrates its current compliance with the *Lifeline Reform Order*, and willingness to comply with forthcoming procedures outlined in the order (such as use of the National Lifeline database), when such procedures become effective.

The *Lifeline Reform Order* also states that carriers like American Broadband who have pending Compliance Plans at the Commission should revise them to comply with the *Lifeline Reform Order*.⁴ As such, American Broadband files this revised Compliance Plan, which complies with the requirements of the *Lifeline Reform Order*. American Broadband respectfully requests expeditious approval of its proposed Compliance Plan.

² *Lifeline and Link Up Reform and Modernization, et al*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket 11-42, *et al*, FCC 12-11, (rel. February 6, 2012) (“*Lifeline Reform Order*”).

³ *Lifeline Reform Order*, ¶ 368.

⁴ *Id.*, at n. 983.

COMPLIANCE PLAN

American Broadband commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. American Broadband will comply with all conditions set forth in any Commission order, the provisions of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported wireless service (both non-facilities-based and facilities-based) to customers throughout our service territories and in addition take the steps set forth herein.

I. Access to 911 and E911 Services

American Broadband will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission removed the requirement to obtain PSAP certifications from Low Income only ETCs in the *Lifeline Reform Order*, but reaffirmed the obligation to provide consumer access to 911 and E911 regardless of activation status and to provide E911-compliant handsets.⁵ American Broadband can comply with both requirements immediately.

The Commission and consumers are hereby assured that all American Broadband 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 American Broadband handsets, even if the account associated with the handset has no minutes remaining. All Lifeline customers will have meaningful access to emergency calling services at the time the

⁵ *Lifeline Reform Order*, ¶¶ 373-75.

customer activates Lifeline service, and that such access will continue regardless of the customer's account status of the availability of prepaid minutes.

The Company's existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying carriers, such as Sprint and Verizon. American Broadband also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

II. E911-Compliant Handsets

American Broadband & Telecommunications will ensure that all handsets used in connection with the Lifeline service offering will be E911-compliant. In fact, American Broadband's phones have always been and will continue to be 911 and E911-compliant. American Broadband uses phones from Sprint and Verizon that have been through a stringent certification process in either Sprint's or Verizon's handset certification lab, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any 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. In the event that an existing customer does not have an E911-compliant handset, American Broadband will replace it with a new 911/E911-compliant handset at no charge to the customer. 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.

III. Certification of Lifeline Customers' Eligibility

To safeguard against misuse of the Lifeline service plan, American Broadband will deal directly with the customer and collect initial and annual certifications required by the *Lifeline Reform Order*. As required by the Order, American Broadband will establish safeguards to prohibit more than one supported service for each household. American Broadband proposes the following plan to implement these certification and verification conditions and will modify the plan to conform to any new rules and orders, once issued and effective:

A. Policy

American Broadband will comply with the minimum federal certification and verification requirements for Lifeline eligibility and any additional requirements established by the states where it is designated as an ETC.

In addition to any state-imposed requirements, American Broadband will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements. American Broadband will enact the same stringent requirements of annual re-certification that it currently uses with its wireline Lifeline service offering. This process requires a customer signed, annual certification form to be entered into our systems prior to any benefits being extended for the next year.

B. Certification Procedures

American Broadband will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting American Broadband via telephone, facsimile, or the Internet. At the point of sale, consumers will be provided with printed information describing American Broadband's Lifeline program, including eligibility requirements, and instructions for enrolling. Materials from USAC, that will be developed

pursuant to the *Lifeline Reform Order*, may also be provided at the point of sale. Specific information will be provided to educate consumers about the one per household rules. Consumers will be signed up in person or directed via Company literature or advertising to a toll-free telephone number and to American Broadband's website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. American Broadband's application form for its wireless service will identify that it is a "Lifeline" application. A sample application form is attached hereto as Exhibit A. In addition to this document, applicants will be required to complete USAC's application form that will be developed pursuant to the *Lifeline Reform Order*, when that form is available.⁶

American Broadband understands and accepts the Commission's requirement that the Company have direct contact with all customers applying for participation in the Lifeline program. American Broadband enrolls individuals through two methods: person-to-person sign-up at areas set up at state government agencies or by application submitted by the individual. First, American Broadband has an employee or agent located in state government offices where members of the public come to meet with their case workers and sign up for various state programs. The agent will explain the eligibility requirements for the program, including participation in a qualifying program or earning income below 135% of the Federal Poverty Guidelines and will verify the individual's eligibility based on a meeting with the person's case worker and verifying documentation obtained from the case workers. The agent will also explain the program limitation of only one Lifeline service per household. Before the service is

⁶ *Lifeline Reform Order*, ¶ 78.

authorized, the individuals eligibility is also verified through the relevant databases as described in further detail below.

Alternatively, individuals may obtain a copy of the application at these state government offices, fill out the necessary information, sign the form and fax them to American Broadband for processing. These applications are also verified through the state case workers and review of the necessary documentation from the case worker. If an individual contacts American Broadband for service via phone, they are instructed to visit an agent (located in governments offices) to receive an application, complete it and fax it to the company. American Broadband does not undertake any outbound telemarketing nor do they accept applications online or over the phone. American Broadband will provide Lifeline-specific training to all personnel, whether employees or agents, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services.

Consumers who do not complete the application process in person must return the signed application and support documentation to the Company, normally by fax. In the future, should the Company use an electronic application process, consistent with Commission regulations, the Company will develop a system to accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC § 7001-7006, and any applicable state laws. Processing of consumers' applications, including review of all application forms and relevant documentation will be performed under American Broadband's supervision by managers experienced in the administration of the Lifeline program. American Broadband will ensure that all required documentation is taken care of properly by using state-specific compliance checklists.

In addition to the Commission’s requirements, in states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate, and to furnish proof that they currently participate in such program(s). For states with income-based eligibility criteria, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (*e.g.*, 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide proof of income-based eligibility. American Broadband will not retain copies of this information, but rather will maintain a database that records what information was provided.⁷ Notwithstanding the foregoing with respect to program or income eligibility, for states that require American Broadband to enroll subscribers identified by the state or as eligible in a state database, American Broadband may continue to rely on the state identification or database. In addition, the Lifeline application form will include a certification section where the applicant must attest and sign under penalty of perjury that the applicant’s representations are true and correct. Applicants will also be required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from American Broadband. Penalties for perjury will be clearly stated on the certification form. American Broadband will use substantially the following form of its certification both in the initial application and annually:

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 11 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program

⁷ *Lifeline Reform Order*, ¶ 101.

2. I understand that Lifeline is a federal benefit and is only available for one phone line per household, whether landline or wireless. For purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household requirement is a violation of FCC rules, will result in de-enrollment from the Lifeline program and potentially prosecution by the federal government. _____

3. I understand that households are not permitted to receive Lifeline benefits from multiple providers. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names AT&T Lifeline, Assurance Wireless, and Safelink.) I certify that to the best of my knowledge, I, and any members of my household, will only receive Lifeline from American Broadband & Telecommunications (AB&T). _____

4. I understand that I must notify AB&T within 30 days if I cease to participate in a qualifying federal program or my annual household income exceed this threshold. _____

5. I understand that I must cancel any Lifeline service or port my number to AB&T prior to establishing my service with AB&T. _____

6. I understand that Lifeline is a non-transferrable benefit and certify that I will only use this phone for my household's own use and will not resell or transfer it. _____

7. I will notify AB&T within 30 days if I, or any member of my household, no longer qualify for Lifeline, I or any members of my household move, or if I, or any member of my household, are receiving more than one Lifeline-supported service. _____

8. I understand that I may be required to re-certify my continued eligibility at any time, and at least annually, and failure to so will result in the termination of my Lifeline benefits _____

9. I certify that I meet the income-based or program-based eligibility criteria for receiving Lifeline service as described by FCC rules _____

10. I understand that my name, telephone number, and address will be divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, or my household, do not receive more than one Lifeline benefit. I consent to inclusion of this information in the support database. _____

11. I understand that if I have listed a temporary residential address, I will be required to verify my temporary residential address every 90 days. _____

Perjury and false statements are punishable by fines and/or imprisonment.

Signature (required)_____ Date_____

To the extent that USAC’s disclosure and application form that is to be developed pursuant to the *Lifeline Reform Order* duplicates these disclosures, this form may be modified to eliminate duplication or eliminated outright if fully covered by the USAC certification form. In such event, American Broadband will use the USAC-developed certification form. Customers will also be provided a verification form consistent with parameters described in the annual Verification section described below. The application forms will require each applicant to provide their name and permanent residential address, and a billing address if different. American Broadband will incorporate this information into its customer information database. These forms will also collect a customer’s date of birth and last four digits of the customer’s Social Security Number as required by the *Lifeline Reform Order*.⁸ Prior to initiating service for a customer, the Company will check the name and address of each Lifeline applicant (and the personal information required for verification) against its database to determine whether or not it is associated with a customer that already receives Lifeline-supported service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset or wireline phone associated with the address. American Broadband will also check the name and address against the national Lifeline database prior to initiating service, once such database is operational. If the Lifeline applicant or address is listed as a duplicate, the applicant will be required to complete the certification developed by USAC, that they live at a multiple household address. American Broadband will also verify a customer’s eligibility using the database by collecting the customer’s data of birth and last four digits of the customer’s social security number and using this information to complete the

⁸ *Lifeline Reform Order*, ¶ 184.

verification process established by the *Lifeline Reform Order*. In addition, prior to requesting a subsidy, American Broadband will process and validate American Broadband's subsidy data, consistent with the standard procedures to be established by USAC and the forthcoming Lifeline database to automatically prevent any household that is already receiving a Lifeline subsidy for services provided by American Broadband from receiving a second Lifeline subsidy in that same month. Further, any prepaid customers who do not use the service in the first instance or who have not used the service within the past 60 days will not be considered active customers for the purposes of requesting subsidies.⁹ For customers who are de-activated for non-usage, American Broadband will update USAC's Lifeline database (when it becomes operational) within one business day of the de-enrollment of the customer from the Lifeline service. American Broadband will provide Lifeline-specific training to all personnel, whether employees or agents, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services.

American Broadband shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent American Broadband customers from engaging in such abuse of the program. American Broadband will make full use of the national Lifeline database when it is operational. In the interim, because of American Broadband's relationship with multiple government agencies throughout our service territory, we are also able to certify eligibility directly with the state agency that provides benefits which qualify customers for Lifeline eligibility.

⁹ See Usage Policy, below.

C. Verification Procedures

American Broadband will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from one ETC.¹⁰ American Broadband will notify each participating Lifeline consumer prior to their service anniversary date that they must confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on record with American Broadband. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact American Broadband. Customers will have 60 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from American Broadband, and return the form to American Broadband by mail or other means that may be developed in the future. The form will remind customers that Lifeline is a federal benefit, that it is only available for one line per household, that “household” in the context of the certification means any individual or group thereof who live together at the same address and share income and expenses, and that a household may not have service from multiple providers. The form will include a statement that violation of these rules constitutes a violation of the program’s rules that will result in immediate de-enrollment from the program and could be the basis for federal criminal prosecution.¹¹ Anyone who does not respond to the mailing and certify their continued eligibility will be de-enrolled from the Lifeline program.

¹⁰ *Lifeline Reform Order*, ¶ 92. Note that in the future, American Broadband may elect to have USAC administer the self-certification process on its behalf, to the extent that option is available in a given state.

¹¹ *Lifeline Reform Order*, ¶ 121.

Currently, customers will be required to complete the verification process by mail; however, American Broadband will offer additional options, such as web-based methods, in the future. Such verification will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from American Broadband at the discounted rate only available to those customers who are enrolled in its Lifeline program. American Broadband will report annually on its verification and re-verification procedures as required by the recently amended section 54.416 of the Commission's Rules.¹²

American Broadband submits that its Compliance Plan fully satisfies the conditions of the *Lifeline Reform Order*. Implementation of the procedures, outlined in this plan, will promote public safety and ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the company's Lifeline service benefits.

IV. Additional Measures to Prevent Waste, Fraud, and Abuse

A. Non-usage Policy

American Broadband will implement a non-usage policy whereby we will identify pre-paid Lifeline customers that have not used the Company's Lifeline service for 60 days. Specifically, if no usage appears on an activated American Broadband pre-paid Lifeline customer's account during any continuous 60-day period, American Broadband will promptly notify the customer that the customer is no longer eligible for American Broadband Lifeline service subject to a 30-day grace period. During the 30-day grace period, American Broadband will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the 30-day grace period (such as making or receiving a voice call to/from anyone

¹² *Lifeline Reform Order*, ¶ 120.

other than American Broadband or its agent, sending a text message, downloading data or adding money to the account), American Broadband will deactivate Lifeline services for that customer unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline. In addition, American Broadband will not seek to recover a federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service. Customers will be informed at the time service is initiated of the deactivation and de-enrollment process that will occur as a result of non-usage.¹³

Customers that receive phones via mail rather than in person must activate their service before they can place calls. American Broadband ensures that phones shipped to customers are only capable of calling 911 and the Company's interactive voice response ("IVR") system. A customer must call the IVR in order to complete the activation process. The Company does not submit a customer who received a shipped phone for Lifeline reimbursement until the customer completes this IVR activation process. American Broadband will apply this activation policy for shipped wireless handsets.

American Broadband will consult with the state commissions (PUCs) in the states where it provides Lifeline services regarding implementation of the policy described above. American Broadband expects that certain state PUCs or similar agencies may seek to incorporate state-specific variations to the policy. Consequently, American Broadband may modify the parameters of the inactivity policy described herein after consultation with the respective state PUCs.

¹³ *Lifeline Reform Order*, ¶ 257.

B. Customer Education with Respect to Duplicates

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, American Broadband will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. Customers shall also be informed that the service is non-transferable. These measures entail additional emphasis in written disclosures as well as live due diligence.

- a) Call Center and Sales Script – American Broadband will emphasize the “one Lifeline phone per household” restriction through its interaction with the potential customer at the call center. American Broadband will also emphasize the “one Lifeline phone per household” restriction through its direct sales contact with the potential customer. The sales training materials will 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. Attached as Exhibit B is a sample of training material that is used to educate sales personnel of the FCC’s regulations regarding the definition of household and the prohibition on multiple lines.
- b) Marketing, Advertising and Website Content – American Broadband, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. Attached as Exhibit C is a copy, to scale, of a two by three foot advertisement display, and description of wireless offerings.
- c) In addition to reminding consumers of the one-per-household rule, American Broadband will comply with the other marketing requirements in the *Lifeline Reform Order* and will explain in all marketing materials that the service offering is a Lifeline-supported service, only eligible consumers may enroll, what documentation is necessary for enrollment, Lifeline is a government benefit program, and consumers who willfully make false statements to obtain Lifeline can be punished by fine or imprisonment or barred from the program.

These statements will also appear on the company’s website (www.ambt.net) during the customer information/education cycle. At the point on its website when a customer inputs his/her zip code to verify that American Broadband offers service in their area, American Broadband will display the required marketing language in the section where the website explains the service and rate plan options. The message would flash to draw attention to it. In addition, American Broadband will include in its printed materials and website substantially the following statement “Not all Lifeline supported programs are identified as ‘Lifeline’ and may be marketed under other brand names.”

C. Cooperation with state and federal regulators

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

- Sharing with state commissions (PUC), the FCC or USAC data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, American Broadband agrees to make available state-specific customer data, including name and address, to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if American Broadband's investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that American Broadband's Lifeline service should be discontinued such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and Order (Section III, B.).

V. Included Usage

American Broadband will offer at least one Lifeline plan that provides consumers with at least 250 included minutes-of-use per month at the lowest end user rate permitted under FCC rules. This provision will expire 36 months from the date of approval of this Compliance Plan.

VI. Service Areas

American Broadband operates as a wireline and wireless carrier in the states of Michigan, Ohio and Indiana. In Michigan, American Broadband is an ETC serving wireline Lifeline customers and has an application pending to provide Lifeline-only wireless services. American Broadband's service territory in Michigan includes the non-rural wire centers and study areas of AT&T Michigan, Frontier North, Inc., Frontier Midstates, Inc., CenturyTel Midwest - Michigan,

Inc., CenturyTel of Michigan, Inc., CenturyTel of Northern Michigan, Inc., CenturyTel of Upper Michigan, Inc., Frontier Communications of Michigan, Inc., Deerfield Farmer's Telephone Company, Ogden Telephone Company, and Sand Creek Telephone Company. In Ohio, the Company is designated as an ETC for wireline services and has an application pending to provide Lifeline-only wireless services in certain exchanges of Verizon North Inc. and AT&T Ohio. In Indiana, the company is licensed as a CLEC in the territories of Frontier and AT&T (fka Indiana Bell). The company serves approximately 1,000 customers in Indiana. The company currently has an application to become a ETC in Indiana pending before the Indiana Utility Regulatory Commission.

Note that American Broadband does not provide service to any Tribal areas, nor do its current business plans anticipate serving Tribal areas in the future. If and when American Broadband plans to expand its service to Tribal areas, American Broadband will amend its application and certification forms to reflect requirements specific to the service of Tribal areas.

VII. Statements required under Section 54.2002 of the Commission's Rules

A. Compliance with Service Requirements

American Broadband certifies that it does now, and will in the future comply with all applicable state and federal requirements applicable to the receipt of Lifeline support.

B. Emergency Functionality

American Broadband is technically qualified to remain functional during emergency situations. In particular, American Broadband's critical infrastructure, its Class 5 switch, is located in a facility that provides redundant and battery back-up power to minimize the risk of service outages during emergency situations. In addition, as a reseller of wireline and wireless

services, American Broadband relies on the network redundancy and disaster preparedness of its network suppliers.

C. Consumer Protection

American Broadband is committed to provide service consistent with appropriate standards for customer protection as established by the FCC and the applicable state Commissions (Ohio, Michigan and Indiana). For the Company's wireless services, American Broadband is committed to providing service in accordance with CTIA's Consumer Code for Wireless Service.

D. Technical and Financial Qualifications

In accordance with the *Lifeline Reform Order*,¹⁴ American Broadband submits that it is technically and financially qualified to operate as a Lifeline-only ETC. As noted above, American Broadband already operates as a wireline Lifeline ETC in the states of Michigan and Ohio, and is licensed as a telecommunications carrier in Ohio, Michigan and Indiana. American Broadband serves more than 30,000 customers in these three states, including more than 10,000 Lifeline-qualified wireline customers in Ohio and Michigan.

The Company's management has more than 50 years experience in the telecommunications industry. The Company owns and operates a partially facilities-based network, including a class 5 switch located in Toledo, Ohio. The Company's financial qualifications are well established, after having been deemed financially qualified to be both a licensed telecommunications carrier and an ETC by two state commissions. Lifeline customers are a relatively small part of the Company's overall revenue, and the Company is not dependent upon Lifeline support revenue as its primary source of income. The Company operates

¹⁴ *Lifeline Reform Order*, at ¶ 387.

profitably and has never filed for bankruptcy protection and plans measured expansion into neighboring states as business conditions allow.

American Broadband is a privately-held company and has no parent company and no affiliated companies. American Broadband has never been the subject of a state enforcement action or ETC revocation proceedings in any state.

E. Lifeline Service Offerings

The required information regarding the Company's Lifeline offerings is included in section V., above, as well as Exhibit C to this filing.

Conclusion

American Broadband respectfully requests that the Commission expeditiously approve its Compliance Plan so that the company may begin providing the benefits of Lifeline service to qualified low-income customers as soon as possible.

Respectfully submitted,

/s/ electronically signed

Tamar E. Finn
Douglas D. Orvis II
Kimberly A. Lacey
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006

Dated: April 27, 2012

Exhibit A

Sample Application Form

Wireless Lifeline Assistance Application

PLEASE MAIL OR FAX SIGNED APPLICATION TO:

ABT Wireless Lifeline– PO Box 577 Toledo, OH 43697

Toll free: 877-777-7922

Fax: 877-211-3705



PLEASE READ, INITIAL AFTER EACH STATEMENT AND SIGN THE FOLLOWING STATEMENT

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 11 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by fines, imprisonment, de-enrollment or being barred from the program _____
2. I understand that Lifeline is a federal benefit and is only available for one phone line per household, whether landline or wireless. For purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household requirement is a violation of FCC rules, will result in de-enrollment from the Lifeline program and potentially prosecution by the federal government. _____
3. I understand that households are not permitted to receive Lifeline benefits from multiple providers. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names AT&T Lifeline, Assurance Wireless, and Safelink.) I certify that to the best of my knowledge, I, and any members of my household, will only receive Lifeline from American Broadband & Telecommunications (AB&T). _____
4. I understand that I must notify AB&T within 30 days if I cease to participate in a qualifying federal program or my annual household income exceed this threshold. _____
5. I understand that I must cancel any Lifeline service or port my number to AB&T prior to establishing my service with AB&T. _____
6. I understand that Lifeline is a non-transferrable benefit and certify that I will only use this phone for my household's own use and will not resell or transfer it. _____
7. I will notify AB&T within 30 days if I, or any member of my household, no longer qualify for Lifeline, I or any members of my household move, or if I, or any member of my household, are receiving more than one Lifeline-supported service. _____
8. I understand that I may be required to re-certify my continued eligibility at any time, and at least annually, and failure to so will result in the termination of my Lifeline benefits _____
9. I certify that I meet the income-based or program-based eligibility criteria for receiving Lifeline service as described by FCC rules _____
10. I understand that my name, telephone number, and address will be divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, or my household, do not receive more than one Lifeline benefit. I consent to inclusion of this information in the support database. _____
11. I understand that if I have listed a temporary residential address, I will be required to verify my temporary residential address every 90 days. _____

Perjury and false statements are punishable by fines and/or imprisonment.

Signature _____

Date _____

Wireless Lifeline Assistance Application

PLEASE MAIL OR FAX SIGNED APPLICATION TO:

ABT Wireless Lifeline- PO Box 577 Toledo, OH 43697

Toll free: 877-777-7922

Fax: 877-211-3705



PLEASE COMPLETE BOTH SIDES OF THIS APPLICATION

Your Name: _____
 (Last) (First) (Middle Initial)

Current Home Telephone Number: _____ Best Contact or Cell Number: _____

Residential Address: _____
 (Number) (Street) (Apartment, Floor)

City/Town: _____ State: _____ Zip Code: _____

Is this a Permanent Address? YES NO Date of Birth ___/___/___ Last 4 Digits of Your Social Security Number _____

Is this a multiple household address? YES NO Billing Address (if different from Residential address)

(Number) (Street) (Apartment, Floor) City/Town State Zip Code

Please Select Your Wireless Plan

Lifeline Wireless Essentials 250 Lifeline Wireless Essentials 500 Lifeline Wireless Unlimited

Program Eligibility

I receive Assistance from one of the following programs (Check all that apply) (NOTE: Social Security and Medicare Alone **DO NOT** qualify for Lifeline).

Food Stamps Federal Public Housing and/or Section 8 Disability Assistance
 Medicaid (Not Medicare) Ohio or Michigan Works First /TANF National School Lunch Program
 Supplemental Security Income (SSI) Low Income Home Energy Assistance (LIHEAP) Temporary Assistance for Needy Families (TANF)
 Federal Public Housing Assistance (Section 8)

AMBT USE ONLY – Please identify which Program Documents from the Box above you used for proof of Program Eligibility

Proof of Food Stamp Participation Federal Public Housing and/or Section 8 Disability Assistance Participation Certification
 Medicaid (Not Medicare)- Program Documentation Ohio or Michigan Works First /TANF documentation National School Lunch Program Eligibility
 Supplemental Security Income (SSI) Participation Low Income Home Energy Assistance- Documents Temporary Assistance for Needy –TANF Cert
 Federal Public Housing Assistance (Section 8)

Income Based Eligibility – DO NOT COMPLETE THIS SECTION IF YOU COMPLETED THE PROGRAM ELIGIBILITY SECTION ABOVE

Calculate TOTAL household income by reporting the income of all adult persons residing in your home in the appropriate category:

Household Size	Maximum Yearly Income
1	\$16,335
2	\$22,065
3	\$27,795
_____	\$ _____

Proof of Income Documentation Examples Include:

Prior year's State or Federal income tax return OR
 Most recent type of current statement from the income source(s) noted below:
 Three consecutive months' worth of your most current pay stubs
 Social Security benefits statement
 Veterans Administration benefits statement
 Retirement/Pension benefits statement
 Divorce decree or child support document
 Unemployment/Workers Compensation benefits statement

If you have more than 3 people in your household, write the number and add \$5,730 for each additional person on top of the \$27,795

I authorize AB&T to Contact my Case Worker to Verify Eligibility:

Name of Case Worker: _____ Phone Number: _____

Eligibility verified by (initial all that apply) (1) Reviewing Customer Documentation _____, (2) Contacting Caseworker _____, (3) Eligibility Database Verification _____

NOTE: YOU MUST COMPLETE BOTH SIDES OF THIS FORM BEFORE WE CAN PROCESS YOUR APPLICATION

FAX SIGNED APPLICATION TO 877-211-3705

v.ASSISTWRLSv.022712

Exhibit B

Training Materials

American Broadband & Telecommunications Call Center/Sales Training

The following information may be used by sales and calling center staff to respond to inquiries about Lifeline supported services.

(1) Confirm the individual is the head of household and they are not currently receiving a Lifeline subsidized service through the following questions:

- “Do you currently have wireless or home phone service?”
- **If no:** skip remaining questions and complete application process.
- **If yes:** “Is the [wireless or home phone] service a subsidized service or do you pay full price?”
- **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
- **If individual is not sure:** “Who is your provider for that service? What is the name of the service?” (Note that Assurance Wireless and SafeLink are Lifeline services.)
- **If it is a Lifeline service:** “We cannot provide you with a second Lifeline phone. If there is a problem with your current service, and you would like to switch to our service, you must authorize ABT to port your telephone number to our service.”

(2) If it appears that the individual does not currently have Lifeline service, proceed with the following steps:

- Using ABT’s database, verify the individual (name, date of birth, last four digits of social security number) is not currently in the ABT system as a registered recipient of Lifeline services. Repeat with state/USAC database if and when available.
 - If there is an active Lifeline account for that individual, explain that “by law, the Lifeline program is only available for one phone per household.” For example, if the customer is in ABT’s database, inform the customer that they must choose ABT wireline Lifeline OR wireless Lifeline service.
 - If there is no active account for that individual, proceed with the application process.
- Using ABT’s database, verify the individual’s address is not currently in the ABT system as a registered recipient of Lifeline services. Repeat with state/USAC database if and when available.

- If there is an active Lifeline account for that address, explain that “by law, the Lifeline program is only available for one phone per household.”
- Explain that, for purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses.
- If customer states address is multifamily or group housing, use USAC form (when developed) to determine if customer qualifies for Lifeline as multiple household.
- If there is no active account for the applicant’s address or household, proceed with the application process.

(3) If check of database(s) verifies individual is not current Lifeline recipient, assist customer in completing application.

- Customer must complete both sides of form.
- Confirm residential address is billing address. If not, collect billing address IN ADDITION TO residential address.
- If address is not permanent, explain that American Broadband must verify address every 90 days. If customer does not respond, Lifeline service will be deactivated.
- Explain service plan options (refer to service description sheet). For customers that elect pre-paid Lifeline Wireless Essentials 250, explain non-usage policy.
 - If no usage appears on an activated American Broadband pre-paid Lifeline customer’s account during any continuous 60-day period, American Broadband will promptly notify the customer that the customer is no longer eligible for American Broadband Lifeline service subject to a 30-day grace period.
 - During the 30-day grace period, American Broadband will attempt to reach customer to determine whether the customer desires to remain on the Company’s Lifeline service.
 - If the customer’s account does not show any customer-specific activity during the 30-day grace period (such as making or receiving a voice call to/from anyone other than American Broadband or its agent, sending a text message, downloading data or adding money to the account), American Broadband will deactivate Lifeline services for that customer unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline.
- With the exception of program eligibility/income eligibility, all sections must be completed.

- Customer should complete EITHER program eligibility OR income eligibility section.
- Review customer documentation supporting eligibility carefully, note which documents reviewed in ABT database.
- Ensure customer reads and initials statements 1-8 on certification section.

Exhibit C

Sample Advertisement and Description of Wireless Offerings

GET CONNECTED... STAY CONNECTED.

GET WIRELESS LIFELINE.



AMERICAN
BROADBAND & TELECOMMUNICATIONS



Wireless Lifeline is a government assisted program that provides qualified low-income consumers with:

- Free cellular phone, provided by American Broadband*
- Includes 250 minutes free monthly airtime, local or long distance
- Free 911 access
- No credit check

Service provided by American Broadband and Telecommunications, a local wireless provider of Lifeline-supported services.

SIGN UP TODAY.

Call **1 (877) 777-7922**
Fax your application to **1 (877) 211-3705**
Visit **www.ambt.net**

You may only have one Lifeline-supported line, either wireless or wireline, per household. Only eligible customers may enroll in the Lifeline program. Proof of eligibility, such as documentation of receipt of benefits (such as Medicaid, TANF or SSI) or proof of income (such as tax returns or pay stubs), is required to enroll. Lifeline is a federal benefit program; persons making false statements in order to obtain Lifeline service can be subject to fines, imprisonment or barred from the Lifeline program.

* Free phone is not supplied or subsidized by any government program.



BROADBAND + TELECOMMUNICATIONS

Stay Connected Wirelessly with:

- Potential or current employers
- Children who are at home while their parents have to go to work
- Healthcare specialists
- Vital emergency responders
- Relatives during a personal emergency

ALL American Broadband & Telecommunications Wireless Lifeline plans come with:

- Superior areas of coverage throughout the entire United States
- Access to 411 with no airtime charges
- Unlimited 911 access
- Call waiting
- Call ID
- Voicemail

3 Great Plans to Choose From!

<p><u>Lifeline Wireless Essentials 250</u></p> <ul style="list-style-type: none"> • 250 FREE Voice Minutes added every month, automatically, you do nothing. • Includes Free Cell Phone* • Access to 911 • Free Voicemail, Caller ID and Call Waiting • Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses. • No annual contract, no monthly Bills <p><small>*Assumes initial and continued program eligibility requirements are met - Non-usage for 60 days will result in a notice that service will be deactivated in 30 days; if customer actively uses service during the 30-day grace period, service will remain active.</small></p>	<p><u>Plan Price: Free*</u></p>
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<p><u>Lifeline Wireless Essentials 500</u></p> <ul style="list-style-type: none"> • 500 Voice Minutes added every month, automatically, you only pay \$9.95. • Includes Free Cell Phone* • Access to 911 • Free Voicemail, Caller ID and Call Waiting • Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses. • No annual contract <p><small>*Assumes initial and continued program eligibility requirements are met</small></p>	<p><u>Plan Price: \$9.95 per month</u></p>
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<p><u>Lifeline Wireless Unlimited</u></p> <ul style="list-style-type: none"> • Unlimited Voice Minutes and Unlimited Texting, you only pay \$39.95. • Includes Free Cell Phone* • Access to 911 • Free Voicemail, Caller ID and Call Waiting • Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses. • No annual contract <p><small>*Assumes initial and continued program eligibility requirements are met</small></p>	<p><u>Plan Price: \$39.95 per month</u></p>
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Need More Minutes? We have 6 Easy Top Up Plans. You can Add Minutes 24 hours per Day, 7 Days Per Week.

<u>Options*</u>	<u>Price</u>	<u>Options*</u>	<u>Price</u>
100 Talk or Text Minutes	\$3.99	240 Talk or Text Minutes	\$ 9.99
180 Talk or Text Minutes	\$5.99	360 Talk or Text Minutes	\$12.99
200 Talk or Text Minutes	\$6.99	500 Talk or Text Minutes	\$19.99

* 1 Text is the equivalent of 1 minute of talk time