

# HURT, Deckard & MAY PLLC

William C. Hurt, Jr.  
William H. May, III +  
Michael D. Kalinyak

THE EQUUS BUILDING  
127 WEST MAIN STREET  
LEXINGTON, KENTUCKY 40507

Telephone - (859) 254-0000  
Facsimile - (859) 254-4763

Matthew R. Malone  
Aaron D. Reedy  
James L. Deckard ++  
Jacob K. Michul

+Also licensed in Indiana  
++Also licensed in Tennessee

January 5, 2016

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JAN 05 2016

PUBLIC SERVICE  
COMMISSION

***Via Hand-Delivery***

Mr. Jeff DeRouen, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RE: *Petition of Platinumtel Communications, LLC DBA Care Wireless For  
Designation as an Eligible Telecommunications Carrier in the  
Commonwealth of Kentucky*

Dear Mr. DeRouen:

Please find enclosed for filing an original and ten (10) copies of Platinumtel Communications, LLC DBA Care Wireless Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky.

Should you have any questions regarding the enclosed, please contact me at your convenience.

Regards,



Matthew Malone

C: File

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**RECEIVED**

JAN 05 2016

PUBLIC SERVICE  
COMMISSION

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IN THE MATTER OF: )  
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)

PETITION OF PLATINUMTEL )  
COMMUNICATIONS, LLC D/B/A CARE )  
WIRELESS FOR DESIGNATION AS AN )  
ELIGIBLE TELECOMMUNICATIONS )  
CARRIER IN THE COMMONWEALTH OF )  
KENTUCKY )  
\_\_\_\_\_

Case No. \_\_\_\_\_

**PETITION OF PLATINUMTEL COMMUNICATIONS, LLC D/B/A CARE WIRELESS  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF KENTUCKY**

Matthew Malone  
Hurt, Deckard & May, PLLC  
127 W. Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (Phone)  
(859) 254-4763 (Fax)  
E-Mail: mmalone@hdmfirm.com

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: lsteinhart@telecomcounsel.com

*Attorneys for PLATINUMTEL COMMUNICATIONS, LLC d/b/a Care Wireless*

January 5, 2016

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**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

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IN THE MATTER OF: )

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Case No. \_\_\_\_\_

**PETITION OF PLATINUMTEL COMMUNICATIONS, LLC D/B/A CARE WIRELESS  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF KENTUCKY**

**I. INTRODUCTION**

PLATINUMTEL COMMUNICATIONS, LLC d/b/a Care Wireless (“PlatinumTel” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Kentucky Public Service Commission (the “Commission”), hereby submits this Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Kentucky. PlatinumTel seeks ETC designation solely to provide Lifeline service to qualifying Kentucky consumers; it will not seek access to funds from the federal or state Universal Service Funds (“USF”) for the purpose of participating in the Link-Up program or providing service to

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<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

high-cost areas.<sup>3</sup> As demonstrated herein, and as certified in Exhibit 1 to this Petition, PlatinumTel meets all the statutory and regulatory requirements for designation as an ETC in the Commonwealth of Kentucky, including the requirements outlined in the FCC's *USF/ICC Transformation Order*<sup>4</sup> and *Lifeline and Link Up Reform Order*.<sup>5</sup> Rapid grant of PlatinumTel's request would advance the public interest by enabling the Company to commence much needed Lifeline services to low-income Kentucky residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition for ETC designation.

All correspondence, communications, pleadings, notices, orders, and decisions relating to this Petition should be addressed to:

Matthew Malone  
Hurt, Deckard & May, PLLC  
127 W. Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (Phone)  
(859) 254-4763 (Fax)  
E-Mail: mmalone@hdmfirm.com

and

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
Email: lsteinhart@telecomcounsel.com

*Attorneys for PLATINUMTEL COMMUNICATIONS, LLC d/b/a Care Wireless*

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<sup>3</sup> PlatinumTel will seek reimbursement from the federal USF and the Kentucky USF. Given that PlatinumTel only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

<sup>4</sup> *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”).

<sup>5</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline and Link Up Reform Order*”).

## II. BACKGROUND

### A. Company Overview

PlatinumTel is a Delaware Limited Liability Company.<sup>6</sup> Its principal office is located at 8108 South Roberts Road, Justice, Illinois 60458. PlatinumTel is a provider of commercial mobile radio service (“CMRS”) throughout the United States and notified the Commission of its intention to provide service in Kentucky on June 16, 2015.<sup>7</sup> PlatinumTel provides prepaid wireless telecommunications services to consumers by using the T-Mobile USA, Inc. (“T-Mobile”) network on a wholesale basis. PlatinumTel obtains from T-Mobile the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator (“MVNO”). PlatinumTel has been designated as an ETC in Illinois and currently has applications for ETC designation pending with the FCC for the states of Alabama, Connecticut, Delaware, Florida, Maine, North Carolina, New Hampshire, New York, Tennessee, Texas, Virginia, and the District of Columbia; no such petitions have been denied.

PlatinumTel’s affordable and easy-to-use prepaid wireless services are attractive to low-income and lower-volume consumers, providing such consumers with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family, as well as for contacting prospective employers. As one of the oldest prepaid providers in the United States, PlatinumTel has been a leader in prepaid wireless by offering consumers an affordable product and by making prepaid wireless easy to understand. Given its pricing and marketing strategy and the demographics of other, similar MVNOs’ customers, PlatinumTel anticipates that many of its customers will be from low-income

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<sup>6</sup> PlatinumTel was organized in the State of Delaware on September 7, 2001. PlatinumTel does not have any holding company, operating companies, or affiliates, and the Company intends to provide Lifeline service under the d/b/a Care Wireless.

<sup>7</sup> PlatinumTel is in the process of registering with the Kentucky CMRS Board for the purpose of E911 surcharge remittance and reporting; *see* 202 KAR 6:080.

backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. PlatinumTel will neither conduct credit checks nor require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

The Company serves primarily residential consumers, most of who reside in urban and inner-city areas. Many of these consumers do not have bank accounts and have limited available funds to purchase communications services. By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers, PlatinumTel will expand the availability of wireless services to many more consumers, which is the principal reason underlying Congress' creation of the universal service program.

#### **B. Proposed Universal Service Offering**

PlatinumTel has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Kentucky. The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other PlatinumTel prepaid customers, with one notable exception: prepaid Lifeline services will require the payment of a comparatively *reduced* out-of-pocket fee by subscribers—or no fee at all for eligible customers choosing the Company's free, 300-minute plan—given the Company's receipt of substantial support from the Lifeline program as compensation for providing those services. PlatinumTel intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice usage at all price points. PlatinumTel provides Lifeline service under the d/b/a Care Wireless. Exhibit 2 summarizes the Company's retail wireless rate

plans to which the federal and state Lifeline discounts would be applied (currently \$9.25 federal and \$3.50 state discount) for eligible subscribers.<sup>8</sup>

In addition to Lifeline-supported voice services, prepaid Lifeline customers will also receive a free handset as well as access to voice mail, caller I.D., on-network roaming, conditional call forwarding, 3-way calling features, and call-waiting services at no additional charge. Customers may use their minutes to place domestic long-distance calls at no additional charge. Calls to 911 emergency services and PlatinumTel customer service (by dialing 611) are always free, regardless of service activation or availability of minutes. No activation fee will apply to Lifeline customers in Kentucky. As Exhibit 2 demonstrates, the Company's Lifeline offerings will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but will also bring a variety of rate plans into the reach of eligible customers that are comparable in minutes and features to those available to post-paid wireless subscribers—but at low Lifeline rates and without the burden of credit checks or service contracts. PlatinumTel's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but are nonetheless concerned about usage charges or long-term contracts.

Low-income consumers will further benefit from PlatinumTel's service because of the Company's unique platform that will allow customers to refill minutes at local stores in neighborhoods where many low-income customers reside. PlatinumTel has existing relationships with thousands of such neighborhood retailers across the United States, including over 30,000 Moneygram locations. This innovative distribution model is more practical and convenient for existing and potential Lifeline customers than other mechanisms, because it allows customers to

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<sup>8</sup> The Company's Lifeline terms and conditions can be found online at [www.carewireless.com](http://www.carewireless.com). The Company's retail terms and conditions can be found online at [www.carewireless.com](http://www.carewireless.com).

obtain additional minutes without the expense and trouble of traveling to retail locations outside their neighborhoods or to having access to a computer to go online. PlatinumTel's distribution arrangement will therefore advance both prior Governor Beshear's and the Commission's goals of increasing awareness of and participation in the Kentucky Lifeline program. If a customer runs out of data, he/she will also be able to replenish via phone, by contacting Customer Service (611) or the Company's toll free number (866-225-5631); online at the Company's website ([www.carewireless.com](http://www.carewireless.com)); or in person at such retail partner locations.

In such an event, additional airtime, text messages, and data can be acquired through the purchase of PlatinumTel Top-Up cards, which are sold in the following denominations: \$10.00, valid for ninety (90) days; \$20.00, valid for ninety (90) days; \$30.00, valid for one hundred and eighty (180) days; \$50.00, valid for one hundred and eighty (180) days; and \$100.00, valid for three hundred and sixty-five (365) days. Such Top-Up airtime will be charged on the following rates: \$0.05 for each anytime voice minute used; \$0.02 for each text message sent; and \$0.10 for each megabyte (MB) of data used.

### **C. Plan Enrollment**

PlatinumTel's primary enrollment methods will be temporary tents or structures at temporary locations as well as its own retail space, in addition to working with other retail outlets across the state as part of its overall business plan for marketing the Lifeline program to eligible customers in the state of Kentucky. PlatinumTel will also utilize marketing materials to direct interested customers to its toll-free customer service line and its website ([www.carewireless.com](http://www.carewireless.com)) for information about the Lifeline program and instructions on how to enroll if eligible.

Customers may then request that an enrollment form be mailed to them, or customers can

download a form from the Internet or retrieve a form in person at existing retail locations. The certification form will explain in clear, easily understandable language that:

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

PlatinumTel's application form for its Care Wireless service will further clearly identify that it is a "Lifeline" application. PlatinumTel will have direct contact with all customers applying for Lifeline service, either in person through its employees or authorized locations, via the company's website, via the telephone (including facsimile), or via mail. PlatinumTel will provide Lifeline-specific training to all personnel, whether employees or authorized locations, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. PlatinumTel's enrollment procedures will further accord with the FCC's requirements and its Compliance Plan, attached hereto as Exhibit 3, which outlines how the Company will comply with the requirements set forth in the *Lifeline and Link Up Reform Order*.

PlatinumTel's certification form will also require all consumers, when signing up for service and annually thereafter, to provide the information and certifications, under penalty of perjury, required by revised 47 CFR § 54.410(d).<sup>9</sup> For more detailed enrollment information,

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<sup>9</sup> See *Lifeline and Link Up Reform Order* at 227-29.

see Exhibit. PlatintumTel will also annually re-certify the continued eligibility of all of its subscribers.

**D. Prevention of Waste, Fraud and Abuse**

PlatinumTel recognizes the importance of safeguarding the USF. Therefore, the Company has implemented the following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of the program. PlatinumTel will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.<sup>10</sup> PlatinumTel will notify its subscribers at service initiation about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.<sup>11</sup> An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: (1) makes a monthly payment; (2) purchases minutes from the Company to add to an existing pre-paid Lifeline account; (3) completes an outbound call; (4) initiates an outbound SMS or data usage; (5) answers an incoming call from anyone other than the Company, its representative, or agent; and/or (6) affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.<sup>12</sup> PlatinumTel will provide the subscriber 30 days' notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be given after 30 days of non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

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<sup>10</sup> See *Lifeline and Link Up Reform Order* at ¶ 257.

<sup>11</sup> See *id.*

<sup>12</sup> See *id.* at ¶ 261.

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

**E. The Commission Has Jurisdiction to Designate Wireless ETCs.**

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.<sup>13</sup> Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.<sup>14</sup> Therefore, the Commission has the authority to designate PlatinumTel as an ETC. Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). PlatinumTel recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC’s Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services

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<sup>13</sup> 47 U.S.C. § 214(e)(2).

<sup>14</sup> See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858–59, ¶ 145 (1997) (“*USF Order*”).

exclusively through the resale of another carrier's services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.<sup>15</sup> Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: "[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section." As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore, may not apply the facilities-based requirement to PlatinumTel. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant PlatinumTel's request for designation as an ETC throughout the Commonwealth of Kentucky.

### **III. PLATINUMTEL SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC**

Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.<sup>16</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services, except where the FCC has forbore from the "own facilities" requirement. Applicants also must commit to advertise the

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<sup>15</sup> See *Lifeline and Link Up Reform Order* at ¶ 368.

<sup>16</sup> See *USF Order*, 8858-59, ¶ 145.

availability and rates of such services.<sup>17</sup> As detailed below, PlatinumTel satisfies each of the above-listed requirements.

**A. PlatinumTel Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements**

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as PlatinumTel. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>18</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.

PlatinumTel will avail itself of the FCC’s grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, PlatinumTel’s Compliance Plan was approved by the FCC on December 26, 2012. A copy of its FCC-Approved Compliance Plan is attached hereto as Exhibit 3. PlatinumTel commits to providing Lifeline service in Kentucky in accordance with the Compliance Plan.

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<sup>17</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

<sup>18</sup> See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

**B. PlatinumTel Is a Common Carrier**

CMRS providers like PlatinumTel are treated as common carriers.<sup>19</sup>

**C. PlatinumTel Will Provide All Required Services and Functionalities**

PlatinumTel is able to provide all of the services and functionalities required by Section 54.101(a) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a)) including the following:

**1. Voice Grade Access to the Public Switched Telephone Network**

PlatinumTel provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from T-Mobile.

**2. Local Usage**

As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. The FCC has not specified a minimum amount of local usage that an ETC must offer.<sup>20</sup> PlatinumTel offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

**3. Access to Emergency Services**

PlatinumTel provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. PlatinumTel also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

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<sup>19</sup> *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also* *PCLA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, . . . all mobile telephone services and resellers of such services.").

<sup>20</sup> *See e.g., In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision, 15 FCC Rcd 7331 (2002).

#### **4. Toll Limitation for Qualified Low-Income Customers**

In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.<sup>21</sup> “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”<sup>22</sup> Nonetheless, PlatinumTel’s offerings inherently allow Lifeline subscribers to control their usage, as the Company’s wireless service is offered on a prepaid, or pay-as-you-go, basis. PlatinumTel’s service, moreover, is not offered on a distance-sensitive basis, and both local and domestic long-distance minutes are treated the same. PlatinumTel will not seek reimbursement for toll-limitation service.

#### **5. Other Services**

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

##### **D. PlatinumTel Will Advertise the Availability of Supported Services**

PlatinumTel will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2) of the FCC’s regulations and the rules adopted by this Commission, and in accordance with the requirements set forth in the *Lifeline and Link Up Reform Order*.<sup>23</sup> The Company will advertise its services in

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<sup>21</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>22</sup> See *id.* at ¶ 49.

<sup>23</sup> See *id.* at Section VII.F.

a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach, including but not limited to television, radio, direct agent contacts, the Internet, and direct mailings.<sup>24</sup> The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline service, promoting the availability of cost-effective wireless services to this neglected consumer segment.

PlatinumTel may also promote the availability of its Lifeline offering by engaging in outreach efforts at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service. In addition, PlatinumTel will utilize its network of retail partners to help promote the availability of its Lifeline plans, especially those retail outlets that are frequented by low-income consumers. PlatinumTel will provide retail vendors with signage to be displayed where Company products are sold, and the Company will provide such vendors with printed materials describing the Company's Lifeline program. The Company expects to be able to adequately inform consumers of the availability of Lifeline service in a manner that will result in higher participation by qualified consumers than has been the case in the past.

PlatinumTel will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service: (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government-benefit program. PlatinumTel's website and printed collateral will explain the documentation necessary for enrollment, and the details of PlatinumTel's plans. Such collateral and website information, as well as its application, will make clear that consumers who willfully

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<sup>24</sup> See attached Exhibit 5 for a sample advertisement.

make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.<sup>25</sup> For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, PlatinumTel will include the URL link for its website ([www.carewireless.com](http://www.carewireless.com)) where disclosures will be listed. Additionally, PlatinumTel will disclose the Company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.<sup>26</sup>

As Governor Beshear and the Commission emphasized when proclaiming September 13–19, 2010 as “Lifeline Awareness Week”, statistics suggest that there are many eligible customers who are not yet aware of the programs.<sup>27</sup> As of December 31, 2011, only between 10–20% of consumers eligible for Lifeline Services in Kentucky were being provided such services.<sup>28</sup> PlatinumTel believes that its advertising and outreach efforts detailed above will ultimately result in increased participation in the Lifeline program.

**E. PlatinumTel Requests Designation Throughout Its Service Area in Kentucky**

PlatinumTel is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, the Company is required to describe the geographic area(s) within which it requests designation as an ETC. PlatinumTel requests ETC designation in the non-rural exchanges of BellSouth Telecommunications, Inc. d/b/a AT&T-Kentucky, Cincinnati Bell Telephone Company, and Windstream Kentucky East.

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<sup>25</sup> See *Lifeline and Link Up Reform Order* at ¶ 275.

<sup>26</sup> See *id.*

<sup>27</sup> See [http://psc.ky.gov/agencies/psc/press/092010/0914\\_r02.PDF](http://psc.ky.gov/agencies/psc/press/092010/0914_r02.PDF) (last visited, June 24, 2015).

<sup>28</sup> See attached Exhibit 4, 2011 Lifeline Participation Rates by State, which the Company obtained from USAC, an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC. USAC administers USF programs for high-cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries.

**F. Service Commitment Throughout the Proposed Designated Service Area**

PlatinumTel provides service in Kentucky by reselling service that the Company obtains from its underlying facilities-based provider, T-Mobile. The provider's network is operational and largely built out. Thus, PlatinumTel will be able to commence offering its Lifeline service to all locations served by its underlying carrier very soon after receiving approval from the Commission. PlatinumTel commits to comply with the service requirements applicable to the support that it receives.<sup>29</sup>

**G. Inapplicability of Five-Year Network Improvement Plan**

PlatinumTel is seeking only low-income support, not high-cost support. As set forth in the *Lifeline and Link Up Reform Order*, a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.<sup>30</sup>

**H. Ability to Remain Functional in Emergency Situations**

In accordance with 47 C.F.R. §54.202(a)(2), PlatinumTel, through its underlying carrier, has the ability to remain functional in emergency situations. Through its agreement with T-Mobile, PlatinumTel provides to its customers the same ability to remain functional in emergency situations as is currently provided by T-Mobile to its own customers, including the ability to maintain a minimum of two hours of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. As a Tier I carrier, T-Mobile has redundancies, a back-up generator power, and an extensive disaster recovery program.

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<sup>29</sup> See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a)(1)(i).

<sup>30</sup> See *id.* at ¶ 386.

## **I. Commitment to Consumer Protection and Service Quality**

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.<sup>31</sup> The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, PlatinumTel commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

## **J. Local Usage Requirement**

An applicant for ETC designation is no longer required to demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.<sup>32</sup> Nevertheless, not only will the Company's offerings be comparable to the underlying ILEC plans, such offerings will also exceed them in several respects. Similar to ILEC Lifeline offerings, PlatinumTel customers will have the option to apply the Lifeline discount to the Company's retail rate plans and will have the option for unlimited local calling. In contrast to the ILEC plans, which contain relatively small local calling areas, PlatinumTel customers can use their minutes to place calls statewide (and even nationwide) because PlatinumTel does not constrict customers' use by imposing a local calling area requirement. PlatinumTel will also provide Lifeline customers with E911 capabilities and access to voice mail, caller I.D., on-network roaming, conditional call forwarding, 3-way calling features, and call waiting services at no additional charge. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

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<sup>31</sup> See 47 C.F.R. § 54.202(a)(3).

<sup>32</sup> See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

### **K. Equal Access Requirement**

The FCC's Rules no longer require an applicant for ETC status to acknowledge that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.<sup>33</sup>

### **L. PlatinumTel is Financially and Technically Capable**

PlatinumTel is financially and technically capable of providing Lifeline-supported services.<sup>34</sup> PlatinumTel is one of the oldest and largest prepaid wireless companies in the United States. The Company is based in Justice, Illinois, and the Company has provided prepaid non-Lifeline wireless services since 2001, as well as Lifeline services since 2011. PlatinumTel services prepaid customers nationally on a network that reaches over 270 million people. PlatinumTel has not been subject to enforcement action or ETC revocation proceedings in any state. PlatinumTel is financially able to provide Lifeline-supported services; the Company does not, and does not intend to, offer exclusively Lifeline-supported services—and the Company is therefore not exclusively dependent on USAC for its revenue. The result of PlatinumTel's efforts is that it is a profitable, liquid company, fully capable of honoring all its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of PlatinumTel has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.<sup>35</sup> The success of PlatinumTel's business is due in large part to the continuity of its highly qualified management team with over 50 years of combined relevant experience. PlatinumTel has a strong IT team devoted to the development of unique business services and over the years has

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<sup>33</sup> See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

<sup>34</sup> See *id.* at ¶ 387.

<sup>35</sup> See Exhibit 6 for key management resumes.

maintained robust and profitable telecommunications operations. PlatinumTel will be providing resold wireless service, and the Company will therefore also rely upon the managerial and technical expertise of its underlying carrier.

**M. PlatinumTel Will Comply with Certification and Verification Requirements**

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. PlatinumTel will certify and verify consumer eligibility in accordance with the FCC's requirements, as revised in the *Lifeline and Link Up Reform Order*,<sup>36</sup> and applicable Commission rules.

**N. PlatinumTel Will Comply With All Regulations Imposed By The Commission**

By this Petition, PlatinumTel hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Petition. Upon Commission request, PlatinumTel is prepared to answer questions or present additional testimony or other evidence about its services within the state. The Company will remit all applicable surcharges on behalf of its Kentucky customers, including the statewide wireless 911 fee and the Kentucky Universal Service Fund, Kentucky Telecommunications Relay Service and the Kentucky Telecommunications Access Program surcharges. PlatinumTel's account is current with the Universal Service Administrative Company in regards to universal service contributions. The Company is aware that there may be an audit of the use of universal service funds and that the eligible telecommunications service designation is reviewed annually by state commissions.

**IV. DESIGNATION OF PLATINUMTEL AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

One of the principal goals of the Act, as amended by the Telecommunications Act of

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<sup>36</sup> See *Lifeline and Link Up Reform Order* at section VI.C.2 (a-b).

1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.<sup>37</sup> Designation of PlatinumTel as an ETC in Kentucky will further the public interest by providing Kentucky consumers, especially low-income consumers, with low prices and high-quality services. Many eligible customers in Kentucky have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context and PlatinumTel’s affordable offerings, designating PlatinumTel as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the Commonwealth of Kentucky—the intended beneficiaries of universal service.

**A. Advantages of PlatinumTel’s Service Offering**

The public interest benefits of the Company’s wireless service include larger local calling areas (as compared to traditional wireline carriers); the convenience and security afforded by mobile telephone service; the opportunity for customers to control cost by receiving a preset amount of monthly airtime at discounted charges—or no charge for Company customers choosing the 300-minute free plan; the ability to purchase additional usage at flexible and affordable amounts, in the event that included usage has been exhausted; 911 service; and, where available, E911 service in accordance with current FCC requirements. The Company’s Lifeline

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<sup>37</sup> *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. PlatinumTel's Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the eligible subscriber choosing the Company's free, 300-minute plan, but the Company's offering will also bring a variety of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers—but at low Lifeline rates and without the burden of credit checks or contracts.

PlatinumTel's Lifeline program will provide low-income Kentucky residents with the convenience and security offered by wireless services—even if their financial position deteriorates. Low-income individuals, now more than ever, can greatly benefit from the advantages offered by the Company's Lifeline service, thus allowing those adversely impacted by the failing economy or job loss to have access to a wholly supported wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

It is also a commonly accepted fact that in today's market all consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be; allows a person seeking employment the ability to be contacted by potential employers; and provides end users with the ability to contact emergency service providers, regardless of location. Providing PlatinumTel with the authority necessary to offer discounted—or free, for Company customers choosing the 300-minute free plan—Lifeline service to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of PlatinumTel's Petition will serve the public interest by increasing the number of ETCs in Kentucky. By granting ETC status to PlatinumTel, the Commission will

enable PlatinumTel to increase the number of Kentucky residents receiving Lifeline support, thereby increasing the amount of USF money flowing into Kentucky. In sum, ETC designation in the Commonwealth of Kentucky would enable PlatinumTel to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*.<sup>38</sup> Namely, PlatinumTel would provide “increased consumer choice, high-quality service offerings, and mobility,”<sup>39</sup> as well as the safety and security of effective 911 and E911 services.<sup>40</sup>

### **B. The Benefits of Competitive Choice**

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.<sup>41</sup> First, designation of PlatinumTel as an ETC will promote competition and innovation, spurring other carriers to target low-income consumers with service offerings tailored to their needs, and to improve their existing networks to remain competitive, resulting in improved services to consumers. Second, designation of PlatinumTel as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.<sup>42</sup> Third, introducing PlatinumTel into the market as an additional wireless ETC provider will afford low-income Kentucky residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Finally, increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

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<sup>38</sup> See *In the Matter of Virgin Mobile USA, L.P. Petition for Limited Designation as an Eligible Telecommunications Carrier*, Docket No. 10-2521-01, Report and Order (May 25, 2011) (“*Virgin Mobile Order*”).

<sup>39</sup> See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

<sup>40</sup> See *id.* at 3391 ¶ 23.

<sup>41</sup> See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

<sup>42</sup> See 47 U.S.C. § 254(b)(1).

### C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company, such as PlatinumTel, or through the Incumbent LEC operating in the same service area. PlatinumTel will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order*, PlatinumTel will minimize the likelihood that its customers are not eligible or are receiving duplicative support either individually or within their household. Significantly, the Company's designation as an ETC will not increase the number of persons eligible for Lifeline support. PlatinumTel's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers. According to the FCC, "the additional choice and service options of another wireless reseller offering a service for low-income consumers represents a significant benefit for consumers and is in the public interest," and "[a] new entrant should incent existing wireless reseller ETCs to offer better service and terms to their customers, which provides additional evidence that forbearance in the context of the Lifeline program outweighs the potential costs."<sup>43</sup>

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<sup>43</sup> See *Petition of i-wireless, LLC for Forbearance from 47 U.S.C § 214(e)(1)(A)*, Order, FCC 10-117 (rel. June 25, 2010) at ¶ 19.

**V. ANTI-DRUG ABUSE CERTIFICATION**

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

**VI. CONCLUSION**

Based on the foregoing, designation of PlatinumTel as an ETC in the Commonwealth of Kentucky accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, PlatinumTel respectfully requests that the Commission promptly designate PlatinumTel as an ETC in the Commonwealth of Kentucky.

Respectfully submitted this 5<sup>th</sup> day of January, 2015.

By: 

Matthew Malone  
Hurt, Deckard & May, PLLC  
127 W. Main Street  
Lexington, Kentucky 40507  
(859) 254-0000 (Phone)  
(859) 254-4763 (Fax)  
E-Mail: mmalone@hdmfirm.com

And

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
Email: lsteinhart@telecomcounsel.com

*Attorneys for PLATINUMTEL COMMUNICATIONS, LLC  
d/b/a Care Wireless*

**EXHIBIT 1**

**Certification of Omar Aqel, Vice-President of PlatinumTel**

State of Illinois

)

County of Cook

)

### Certification

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Omar Aqel, who first being duly sworn, deposes and states that he is the Vice President of PLATINUMTEL COMMUNICATIONS, LLC d/b/a Care Wireless, Applicant in this application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of his knowledge and belief.

Dated: 8/5/15

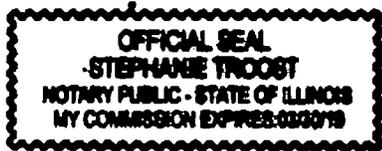
*Omar Aqel*  
Omar Aqel, Vice President

Subscribed and sworn to before me this 5 day of August, 2015.

(Notary Seal)

*Stephanie Troost*  
(Signature of person authorized to administer oath)

My Commission Expires: 3/30/19



## EXHIBIT 2

### Proposed Lifeline Offering

The Company proposes to offer the following wireless rate plans to eligible subscribers:

**Option 1: Free Airtime Plan.** Eligible customers will enjoy \$15.00 worth of airtime service for free, which customers may use at their discretion interchangeably on up to 300 anytime voice minutes or 750 text messages (SMS) at the following rates: \$0.05 per voice minute and \$0.02 per SMS. Each time a customer makes a call to 411, a \$0.50 charge is deducted from his or her customer account balance. The retail rate of this plan is \$15.00 per month; however, the net cost of this plan after application of the federal and state Lifeline discount, as well as a Company discount, will be \$0.00 per month.

**Option 2: Discounted Retail Rate Plans.** Eligible customers will enjoy unlimited anytime voice minutes, unlimited text messaging (SMS), unlimited multimedia messaging (MMS), unlimited global texting, and either 250 megabytes (MB) or unlimited data. Retail rates range from \$20.00 to \$60.00 per month, depending on the speed of data selected; the net cost will range from \$7.25 to \$47.25 per month after application of all federal and state Lifeline discounts. For more information, see the retail rate plan chart below, as well as [www.ptel.com/plans](http://www.ptel.com/plans):

	<b>\$20</b>	<b>\$25</b>	<b>\$30</b>	<b>\$40</b>	<b>\$50</b>	<b>\$60</b>
Talk	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Text	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data	250 MB	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
High Speed Data *	Yes	-	First 1 GB	First 2 GB	First 3 GB	First 10 GB
Max Speed	3G/4G	2G	4GLTE	4GLTE	4GLTE	4GLTE
MMS	MMS **	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Global Text	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Int'l Dialing Credit	\$1	\$2.50	\$5	\$5	\$5	\$10
Unlimited Int'l Calls	-	-	-	Yes	Yes	-
Lifeline discount	-\$9.25	-\$9.25	-\$9.25	-\$9.25	-\$9.25	-\$9.25
State Lifeline discount	-\$3.50	-\$3.50	-\$3.50	-\$3.50	-\$3.50	-\$3.50
<b>Net Lifeline cost</b>	<b>\$7.25</b>	<b>\$12.25</b>	<b>\$17.25</b>	<b>\$27.25</b>	<b>\$37.25</b>	<b>\$47.25</b>

\*High speed refers to 3G/4G

\*\* MMS available on \$20 plan as long as subscriber has data balance remaining

**Additional Top-Up Airtime, Text Messages, and Data Rates.** Eligible customers can add additional airtime to their Care Wireless phone by purchasing PlatinumTel Top-Up Cards at over 30,000 authorized retail locations around the nation. Top-Up cards are available in the following denominations: \$10.00, valid for ninety (90) days; \$20.00, valid for ninety (90) days; \$30.00, valid for one hundred and eighty (180) days; \$50.00, valid for one hundred and eighty (180) days; and \$100.00, valid for three hundred and sixty-five (365) days. Such Top-Up airtime will be charged at the following rates: \$0.05 for each anytime voice minute used; \$0.02 for each text message sent; and \$0.10 for each megabyte (MB) of data used.

**EXHIBIT 3**

**PlatinumTel's Approved FCC Compliance Plan**

ROWLAND & MOORE LLP

ATTORNEYS AT LAW  
SUITE 400  
200 WEST SUPERIOR STREET  
CHICAGO, ILLINOIS 60654-3556

E-MAIL: tom@telecomreg.com

VOICE: (312) 803-1000  
FACSIMILE: (312) 803-0953

December 19, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: WC Dockets 09-197 and 11-42 –Amended Compliance Plan of PlatinumTel  
Communications, LLC

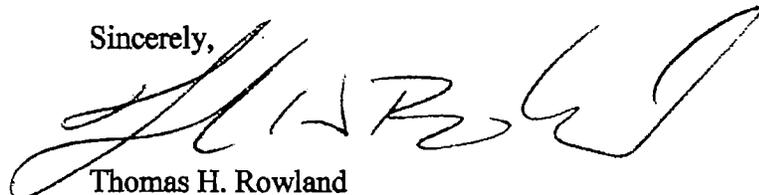
Dear Ms. Dortch:

Pursuant to the Federal Communications Commission Order *In the Matter of Lifeline and Link Up Reform and Modernization* released February 6, 2012, attached please find the Amended Compliance Plan of PlatinumTel Communications, LLC to be filed in WC Dockets Nos. 09-197 and 11-42.

In this Amended Compliance Plan PlatinumTel made several clarifications. First, PlatinumTel clarified that it acquires minutes of use directly from its underlying carrier. Second, PlatinumTel inserted a description of how the Company, through its employees and agents deals directly with its customers to certify and verify the customer's Lifeline eligibility. Finally, PlatinumTel clarified its procedures for the pending National Database.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'THOMAS H. ROWLAND', written in a cursive style.

Thomas H. Rowland

THR/ac

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
PlatinumTel Communications LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)	)	

**PLATINUMTEL COMMUNICATIONS LLC'S REVISED COMPLIANCE PLAN**

Thomas H. Rowland  
Kevin D. Rhoda  
Rowland & Moore LLP  
200 West Superior Street  
Suite 400  
Chicago, Illinois 60654  
(312) 803-1000

Counsel for PlatinumTel Communications, LLC

Dated: December 19, 2012

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
PlatinumTel Communications LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)	)	

**PLATINUMTEL COMMUNICATIONS LLC’S REVISED COMPLIANCE PLAN**

PlatinumTel Communications, LLC (“PlatinumTel” or “Company”), by its attorney, hereby files this Revised Compliance Plan outlining the measures it will take to implement the conditions imposed by the Federal Communications Commission (“FCC” or “Commission”) in its recent Orders released on September 23, 2011<sup>1</sup> and on February 6, 2012<sup>2</sup> in the above-captioned proceeding.<sup>3</sup>

PlatinumTel has incorporated in its marketing materials for its Lifeline services, in clear, easily understood language, the various disclosures required by 47 C.F.R. § 54.405. PlatinumTel has attached its marketing materials incorporating these disclosures. PlatinumTel concurs with the Commission’s policy to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, PlatinumTel has implemented procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual. These measures include practices intended to: (1) prevent duplicates within PlatinumTel’s subscriber base; (2) avoid reimbursement for any

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<sup>1</sup> *In the Matter of PlatinumTel LLC Petition for Forbearance*, Order, FCC 11-139, (released September 23, 2011) (“*Forbearance Order*”).

<sup>2</sup> *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) (“*Lifeline and Link Up Reform and Modernization Order*”).

<sup>3</sup> This Revised Compliance Plan is intended to replace the earlier versions filed by PlatinumTel.

subscriber until the subscriber activates service; (3) cease reimbursement for subscribers who fail to use the service for a 60-day period; (4) ensure that only qualifying individuals demonstrating proof of eligibility are enrolled to receive Lifeline service; and (5) ensure that PlatinumTel provides only one Lifeline service per household. As indicted below, PlatinumTel's practices and procedures comply with the Commission's applicable Lifeline regulations and orders, and PlatinumTel commits to continuing these practices going forward. PlatinumTel respectfully requests expeditious approval of its pending Petition for Designation as an Eligible Telecommunications Carrier and this Amended Compliance Plan.

## **I. Introduction**

### **A. Company Background**

PlatinumTel Communications, LLC ("PlatinumTel") has been providing prepaid wireless telecommunications services to low income consumers throughout the United States since 2001, making it one of the earliest pioneers in prepaid wireless. Today the Company serves customers in 48 states. In 2009 PlatinumTel was certified as an ETC in Illinois. PlatinumTel operates through a combination of resale throughout its service area as well as facilities that it owns in Illinois.<sup>4</sup> In Illinois, PlatinumTel currently provides Lifeline services under the service name Care Wireless.<sup>5</sup> PlatinumTel does not own any affiliates.

### **B. PlatinumTel Forbearance Order**

The Commission's *Forbearance Order* conditionally granted PlatinumTel's request for forbearance from the Section 214(e)(1)(A) requirement that a carrier designated as an ETC for purposes of federal universal service support provide services, at least in part, over its own

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<sup>4</sup> PlatinumTel does not purchase minutes from third party providers and has agreements to purchase minutes directly from its underlying carrier Sprint Spectrum LP ("Sprint").

<sup>5</sup> PlatinumTel will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

facilities, stating PlatinumTel may seek ETC designation to offer discounted services to qualified low-income consumers through the universal service Lifeline program.<sup>6</sup>

The Commission's grant of forbearance is subject to the following conditions: (a) PlatinumTel providing its Lifeline customers with 911 and Enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (b) PlatinumTel providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) PlatinumTel complying with conditions (a) and (b) as of the date it provides Lifeline service; and (d) PlatinumTel obtaining a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met<sup>7</sup>; (e) PlatinumTel requiring each customer to self-certify under penalty of perjury at the time of enrollment and annually thereafter until a national duplicates database is in place that he or she is the head of household and receives Lifeline-supported service only from PlatinumTel and does not receive Lifeline-supported service from any other provider; (f) PlatinumTel requiring each eligible Lifeline consumer at the time of enrollment to initial on the certification form that to the best of his or her knowledge he or she is not receiving Lifeline service from any other Lifeline provider and listing as examples the brand names of at least the leading wireline and leading two wireless Lifeline providers in the area to ensure the customer understands what is meant by Lifeline-supported service; (g) PlatinumTel making available state-specific subscriber data, including name and address of Lifeline subscribers, to USAC and each state PUC where it operates to determine

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<sup>6</sup> *Forbearance Order* at ¶1.

<sup>7</sup> This obligation was revised in the Commission's *Lifeline and Link Up Reform and Modernization Order* at paragraphs 375 and 383. PlatinumTel agrees to abide by any state-specific obligations to obtain either a certification from each PSAP where it plans to offer service, or a self-certification, confirming that it provides its subscribers with 911 and E911 access.

whether an existing Lifeline subscriber receives Lifeline service from another carrier; (h) assisting the Commission, USAC, state commissions and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including providing upon request, the necessary information to detect and resolve duplicative Lifeline claims; (i) PlatinumTel establishing safeguards to prevent its customers from receiving multiple Lifeline subsidies at the same address and preventing individual subscribers from receiving more than one Lifeline discount; (j) PlatinumTel implementing a non-usage policy, if applicable, in states where PlatinumTel provides service at no monthly charge, requiring PlatinumTel to identify subscribers that have not used Lifeline service for 60 days and not seek support for such subscribers if they do not use the Lifeline service during a 30 day grace period; (k) PlatinumTel dealing directly with the customer to certify and verify the customer's Lifeline eligibility; (l) PlatinumTel explaining in prominent, plain, easily comprehensible language to all existing and new or potential subscribers that no consumer is permitted to receive more than one Lifeline subsidy; (m) PlatinumTel ensuring that all marketing materials for the service make clear that it is a Lifeline-supported service; (n) PlatinumTel immediately de-enrolling any subscriber who PlatinumTel knows is receiving Lifeline-supported service from another ETC or knows is no longer eligible; and (o) PlatinumTel providing a detailed description of its various Lifeline plans, including rates, number of minutes included and types of plans available.<sup>8</sup> The Commission required PlatinumTel to submit a plan describing the measures it would take to implement each one of these conditions within 30 days of the release of the Order.<sup>9</sup>

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<sup>8</sup> See *Forbearance Order* at ¶¶ 11, 17.

<sup>9</sup> See *Id.* at ¶¶ 17.

**II. PlatinumTel will provide Lifeline ETC services pursuant to the conditions contained in the PlatinumTel Forbearance Order and the Commission’s Lifeline and Link Up Reform and Modernization Order.**

**A. PlatinumTel Commits to Provide Access to 911 and E911 Services.**

PlatinumTel will provide all of its Lifeline subscribers with access to emergency calling services at the time the Lifeline service is initiated. Such 911 and E911 access will be available from PlatinumTel handsets regardless of the status of the subscriber account or the airtime balance associated with the handset. The Company’s current practice provides access to 911 and E911 service to the extent that these services have been deployed by its underlying carrier, Sprint Nextel Corporation (“Sprint”). Under current practice, access to such emergency services is still made available to subscribers whether their account is active, suspended, terminated, or has reached the minimum required airtime balance.

Paragraphs 373-75 of the *Lifeline and Link Up Reform and Modernization Order* provided further guidance regarding access to 911 and E911 services. PlatinumTel further agrees to abide by any state-specific obligations to obtain either a certification from each PSAP where it plans to offer service, or a self-certification, confirming that it provides its subscribers with 911 and E911 access.<sup>10</sup>

**B. E911-Compliant Handsets**

PlatinumTel will ensure that all handsets shipped to Lifeline service subscribers will be E911-compliant. The Company’s current lineup of mobile devices are all 911 and E911-Compliant. PlatinumTel will provide all of its Lifeline subscribers with 911 and E911 access from PlatinumTel handsets regardless of the status of the subscriber account or the airtime

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<sup>10</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶¶375, 383. PlatinumTel will obtain such certifications based on individual state-specific obligations.

balance associated with the handset.<sup>11</sup> In the event that an existing subscriber has a noncompliant handset, the Company will immediately replace such device with an E911-Compliant handset at no additional charge to the subscriber.

**C. PlatinumTel will Comply with the Obligations Related to the Commission’s Forbearance of the Own Facilities Requirement.**

Paragraph 379 of the *Lifeline and Link Up Reform and Modernization Order* contains obligations related to the FCC’s blanket forbearance of the “own facilities” requirement for Lifeline-only ETCs and the implementation of the terms and conditions of the Order.<sup>12</sup>

**1. Enrollment Procedures**

PlatinumTel will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting PlatinumTel in person or via telephone, facsimile, or the Internet. Consumers will be provided with printed information describing PlatinumTel’s Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to PlatinumTel’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. Applicants are required to provide PlatinumTel with documents demonstrating their eligibility based on the qualifying program they selected.

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<sup>11</sup> See *Lifeline and Link Up Reform and Modernization Order* at ¶373.

<sup>12</sup> PlatinumTel is a facilities-based wireless carrier in Illinois, where it maintains its own switches and routers for handling voice telephony services. However, given that the *Lifeline and Link Up Reform and Modernization Order* alters the obligation for facilities on a prospective basis, PlatinumTel requests that the FCC’s forbearance authority (if it did not do so already) include PlatinumTel’s operation in Illinois, in addition to operations in all other states in which it does business.

The Commission determined in the *Lifeline and Link Up Reform and Modernization Order* that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because “the Commission has consistently found that ‘[l]icenses and other Commission regulates are responsible for the acts and omissions of their employees and independent contractors.’”<sup>13</sup> Because PlatinumTel is responsible for the actions of all of its employees and agents, including those enrolling customers in any PlatinumTel owned or affiliated retail locations, and a PlatinumTel employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, the Company always “deals directly” with its customers to certify and verify the customer’s Lifeline eligibility.

PlatinumTel’s application form for its Care Wireless service will clearly identify that it is a “Lifeline” application. PlatinumTel will have direct contact with all customers applying for Lifeline service, either in person through its employees or authorized locations, via the company’s website, via the telephone (including facsimile) or mail. PlatinumTel will provide Lifeline-specific training to all personnel, whether employees or authorized locations, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. PlatinumTel will ensure that all required documentation is taken care of properly by using state-specific compliance checklists. For 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.

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<sup>13</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶110.

The applicant will also be required to authorize Care Wireless to transmit subscriber information required for the administration of the Lifeline credit program, including to USAC to be used in a Lifeline program database.<sup>14</sup>

Pursuant to the *Lifeline and Link Up Reform and Modernization Order* PlatinumTel's certification form will also "explain in plain, easily comprehensible language that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) a household is not permitted to receive Lifeline benefits from multiple providers".<sup>15</sup>

Upon enrollment, PlatinumTel will inform consumers about the annual re-certification requirement on the certification form.<sup>16</sup> Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements—including a statement to the effect that to the best of his or her knowledge, the applicant is not receiving Lifeline-supported service from any other Lifeline provider. Penalties for perjury will be clearly-stated on the certification form. The certification form will also contain language stating that violation of the one-per-household requirement constitutes a violation of the Commission's rules and will result in the consumer's de-enrollment from the program, and could result in criminal prosecution by the United States government.<sup>17</sup>

In accordance with the *Lifeline and Link Up Reform and Modernization Order*, PlatinumTel will obtain the consumer's residential address (post office boxes and general delivery mailboxes are not accepted), which the consumer must indicate is his or her permanent

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<sup>14</sup> See Section 54.404(b)(9).

<sup>15</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶121.

<sup>16</sup> See *Id.* at ¶145.

<sup>17</sup> *Id.* at ¶121.

address, temporary address, or a multi-household residence, and a billing address for the service (if the consumer's billing address differs from his or her residential address).<sup>18</sup> A consumer who lacks a permanent residential address must provide a temporary residential service address or other address identifying information that could be used to perform a check for duplicative support. For applicants that use a temporary address, the applicant will be required to verify every 90 days that the subscriber continues to rely on that address.<sup>19</sup> If the applicant does not respond to address verification attempts within 30 days, the subscriber will be de-enrolled from Lifeline service.<sup>20</sup> The application form will also clearly state that Lifeline participants must provide their new address to the Company within 30 days of moving<sup>21</sup> or they will be de-enrolled from the Lifeline program. Applicants who select "Multi-Household" are required to complete the "Lifeline Household Worksheet" (see Exhibit A) as defined by the Universal Service Administrative Corporation ("USAC") to demonstrate whether there is a single or multiple households at the address provided. PlatinumTel further agrees to comply with all other updated Commission enrollment rules.<sup>22</sup>

The *Lifeline and Link Up Reform and Modernization Order* confirmed that the Commission will transition to a governmental database in order to confirm the initial and continued eligibility of a lifeline customer. The Order stated:

As explained above, we conclude that establishing a fully automated means for verifying consumers' initial and ongoing Lifeline eligibility from governmental data sources would both improve the accuracy of eligibility determinations and

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<sup>18</sup> Id. at ¶85.

<sup>19</sup> See 47 CFR 54.410(d)(3)(iv). See also 47 CFR 54.410(g), a requirement that is not yet effective. Notice of Office of Management and Budget Action dated April 13, 2012 ("Information collection request updated to remove the following information collections from this request: the temporary address confirmation and recertification (47 C.F.R. § 54.410(g) and the portion of 47 C.F.R § 54.405(e)(4) relating to temporary address de-enrollment) and the biennial audit requirement (47 C.F.R. § 54.420(a)). FCC may re-submit these removed collections for OMB review at a later date after further consideration.")

<sup>20</sup> *Lifeline and Link Up Reform and Modernization Order* at Appendix C.

<sup>21</sup> Id. at ¶¶85, 117.

<sup>22</sup> See *Id.* at ¶60 and Appendix C.

ensure that only eligible consumers receive Lifeline benefits, and reduce burdens on consumers as well as ETCs. . . . We therefore direct the Bureau and USAC to take all necessary actions so that, as soon as possible and no later than the end of 2013, there will be an automated means to determine Lifeline eligibility for, at a minimum, the three most common programs through which consumers qualify for Lifeline.<sup>23</sup>

However, until the database is operational, PlatinumTel will continue to abide by its established enrollment procedures. When the National Lifeline Accountability Database (“National Database”) becomes available, PlatinumTel will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.

PlatinumTel will 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.<sup>24</sup> Pursuant to the *Lifeline and Link Up Reform and Modernization Order*, PlatinumTel will not retain copies of proof documentation, but rather will maintain accurate records detailing how the consumer demonstrated his or her eligibility.<sup>25</sup>

PlatinumTel’s Lifeline application form (Exhibit B) includes 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 that they only receive one Lifeline-supported service per household. Penalties for perjury will be clearly-stated on the certification form, as required by the Order. PlatinumTel will use substantially the following form of its certification, printed in at least 10 point font. PlatinumTel will also ensure the customer acknowledgements reflect any state-specific disclosures as required by each state,

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<sup>23</sup> Id. at ¶403.

<sup>24</sup> Id. at ¶168.

<sup>25</sup> Id. at ¶101.

in addition to the standard disclosures. PlatinumTel will require applicants to initial each of the following acknowledgements:

I certify under penalty of perjury to each of the following *(initial each box)*:

1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.

2) I meet the eligibility requirements of the program(s) checked above, or have an annual household income at or below 135% of the Federal Poverty Guidelines.

3) I am not listed as a dependent on another person's tax return (unless over the age of 60).

4) I have provided documentation of eligibility.

5) I understand that I and my household can only have one Lifeline-supported telephone service. Care Wireless has explained the one-per-household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government.

6) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline-supported service from any other land line or wireless company such as Safelink, Assurance, or Reachout Wireless.

7) I understand that my Care Wireless Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.

8) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period during which I may use the service or contact Care Wireless to confirm that I want to continue receiving service.

9) I will notify Care Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify Care Wireless if: a) I cease to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines; b) I am receiving more than one Lifeline supported service; c) I no longer satisfy the criteria for receiving Lifeline support.

10) I will notify Care Wireless within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Care

Wireless every ninety (90) days. If I fail to respond to Care Wireless' verification attempts within thirty (30) days, my Care Wireless Lifeline service may be terminated.

11) Care Wireless has explained to me that I may be required to re-certify my continued eligibility for Lifeline at any time. If I fail to do so within thirty (30) days, it will result in termination of my Care Wireless Lifeline service.

12) I understand, and consent to the fact that my name, telephone number, address, date of birth, last four digits of my social security number, dates of service initiation and/or termination, and qualifying basis for Lifeline service will be provided to the Universal Service Administrative Company, the administrator of the Lifeline program, and/or its agents, for the purpose of verifying that I do not receive more than one Lifeline benefit.

13) I authorize Care Wireless to access any records required to verify my statements on this form and to confirm my eligibility. I give permission to the duly authorized official(s) administering the above programs to provide to Care Wireless my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by Care Wireless as confidential customer account information.

#### **Penalty of Perjury**

**Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.**

**\*BY LAW THE LIFELINE PROGRAM IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, WHETHER LANDLINE OR WIRELESS, NO EXCEPTIONS\***

In order to further the Commission's goal of eliminating waste, fraud, and abuse, PlatinumTel takes multiple steps to eliminate duplicate enrollments, and fraudulent applications. Applications entered from all channels go into PlatinumTel's database and go through the following checks to validate that the application should be processed:

1. Address is sanitized and validated using the United States Postal Service ("USPS") Address Matching System ("AMS");
2. Address is checked in PlatinumTel's database against:
  - a. Flagged addresses that are known to be fraudulent and/or known not to be eligible;

- b. Existing enrollments for duplicate addresses (pending and approved);
3. Customer's full name and last four (4) digits of their social security number are compared in the database against existing and flagged enrollments. PlatinumTel uses multiple search methods to compare the data to include nicknames and abbreviations of names;

*NOTE: When available, PlatinumTel will submit the applicant's information to a state database and/or the National Lifeline Accountability Database to determine the applicant's eligibility.*

4. Customer's proof of benefits are compared with the information submitted on the application to confirm a match. Once the proof document has been reviewed and recorded in the database, the physical document is destroyed. PlatinumTel records the type of document submitted, associated program, date on the document, the date the document is submitted, and the username of the associate responsible for review of the document, all of which is stored in the PlatinumTel database.
5. Customer is informed of all of the terms and disclosures they are required to accept in order to proceed.
6. Upon acceptance of the disclosures and terms, the application is submitted for approval and processing. All customer acknowledgements are stored in the database as part of the customer's enrollment record.

## **2. Procedures for Submitting for Reimbursement from USAC**

PlatinumTel agrees to comply with all certification requirements contained in the *Lifeline and Link Up Reform and Modernization Order* and outlined in 47 CFR 54.407 when submitting for reimbursements from USAC.<sup>26</sup> As part of each reimbursement request PlatinumTel will certify that it is in compliance with all of the Commission's Lifeline rules, and to the extent required, has obtained valid application/certification and verification for each of its subscribers subject to the request for reimbursement.<sup>27</sup> PlatinumTel will also transition the submission of its Form 497s to the eighth day of each month in order to be reimbursed in the same month, and inform USAC, to the extent necessary, to transition its reimbursement process to actual claims

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<sup>26</sup> See, for example, *Lifeline and Link Up Reform and Modernization Order* at ¶¶125-28.

<sup>27</sup> Id. at ¶128; 47 USC 54.407(d).

rather than projected claims over the course of more than one month.<sup>28</sup> Finally, PlatinumTel will maintain accurate records as directed by USAC and as required by Section 54.417 of the Commission's rules.

### 3. Ongoing Verification

The *Lifeline and Link Up Reform and Modernization Order* described the initial and annual verification procedures at paragraphs 120-148 and in Appendix C. Since beginning to offer Lifeline service in Illinois, PlatinumTel has required every consumer enrolled in the Lifeline program to verify on an annual basis that (1) he or she receives Lifeline-supported service only from PlatinumTel; (2) to the best of his or her knowledge, no one else in the subscriber's household is receiving a Lifeline-supported service<sup>29</sup>; (3) the customer is still eligible to receive Lifeline benefits; and (4) the customer's information remains true and correct, and that if any of their information has changed, they will contact PlatinumTel to make the changes. Any customer that is found to not comply with the rules or that fails to respond to the annual recertification process will be de-enrolled.<sup>30</sup>

PlatinumTel will notify each participating Lifeline consumer sixty (60) days prior to the recertification deadline that they must confirm their continued eligibility in accordance with the applicable requirements. Such verifications will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from PlatinumTel at the discounted rate only available to those customers who are enrolled in its Lifeline program. Customers are notified multiple times over the sixty (60) day period via a robocall system, SMS messages, emails (if available), and letters via USPS. PlatinumTel also keeps customers aware that annual re-verification is required by regularly reminding customers via posting on

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<sup>28</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶¶302-306.

<sup>29</sup> *Id.* at ¶120.

<sup>30</sup> *Id.* at ¶122.

[www.carewireless.com](http://www.carewireless.com), when customers contact the enrollment center, when customers contact customer service, and via social networks like Facebook, Twitter and Pinterest. PlatinumTel provides multiple methods for customers to process their annual re-verification, including calling into the IVR, speaking with an enrollment representative, or online at carewireless.com. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact PlatinumTel to complete verification. If the customer does not respond by the sixtieth day, a termination letter is sent to the customer. Customers will have 30 days following the date of the termination letter to complete the form, certify under penalty of perjury that no one else in the household receives Lifeline service from another carrier and return the form to PlatinumTel by mail. If the subscriber does not respond within 30 days to the mailing and certify their continued eligibility, the subscriber will be removed from the Lifeline program within 5 days.

PlatinumTel will submit an annual certification to the USAC, signed by a Company officer under penalty of perjury, that PlatinumTel: (1) has policies and procedures in place to review consumer's proof of eligibility documentation and ensure that its Lifeline subscribers are eligible to receive Lifeline services;<sup>31</sup> (2) is in compliance with all federal Lifeline certification procedures;<sup>32</sup> and (3) has obtained a valid application/certification form for each subscriber for whom PlatinumTel seeks Lifeline reimbursement.<sup>33</sup> Pursuant to the new rules, PlatinumTel will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013.<sup>34</sup> Where ongoing eligibility cannot be determined through access to a qualifying database either by the Company or the state, and there

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<sup>31</sup> *Id.* at ¶126; 47 USC 54.416(a)(1).

<sup>32</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶126; 47 USC 54.54.416(a)(2).

<sup>33</sup> 47 USC 54.416(a)(3).

<sup>34</sup> *Lifeline and Link Up Reform and Modernization Order* at Appendix C.

is no state administrator verifying the continued eligibility of Lifeline subscribers, the Company will re-certify the continued eligibility of all of its subscribers by contacting them, either in person, in writing, by phone (e.g., via IVR (Interactive Voice Response) System), by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.<sup>35</sup> In states where a state agency or a third party has implemented a database that carriers may query to re-certify the consumer’s continued eligibility, the Company (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification.<sup>36</sup> The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact PlatinumTel.

PlatinumTel will provide the results of its annual recertifications/verifications to the Commission, the USAC, and to the applicable state public utility commissions.<sup>37</sup> PlatinumTel will annually report its Company name, names of its holding company, operating companies and affiliates, and any branding (such as a “d/b/a” or brand designation) as well as relevant universal service identifies for each entity by Study Area Code.<sup>38</sup> PlatinumTel will also report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>39</sup> Finally, PlatinumTel will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer

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<sup>35</sup> See Id.

<sup>36</sup> Id. at ¶131.

<sup>37</sup> Id. at ¶¶132-148; 47 USC 54.416(b).

<sup>38</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶¶296, 390; 47 USC 54.422(a).

<sup>39</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶390; 47 USC 54.422(b)(5).

protection rules, as well as a certification that PlatinumTel is able to function in emergency situations.<sup>40</sup>

### **III. Additional Measures to Prevent Waste, Fraud, and Abuse**

#### **A. Non-usage Policy**

PlatinumTel will implement a non-usage policy whereby we will identify Lifeline customers that have not used the Company's Lifeline service for sixty (60) days, and cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. PlatinumTel has implemented an automated notification system which monitors Lifeline customer usage and automatically sends a text message to customers when there is sixty (60) days of non-usage. Customers receive the following message, "FREE NOTICE: YOUR LIFELINE ACCOUNT MAY BE DISCONNECTED DUE TO NON-USAGE FOR 60 DAYS. UNUSED SERVICE FOR 60 DAYS WILL RESULT IN DE-ENROLLMENT. CALL 855-711-2222" Specifically, if no usage appears on a PlatinumTel Lifeline customer's account during any continuous sixty (60) day period, PlatinumTel will promptly notify the customer that the customer is no longer eligible for PlatinumTel Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but PlatinumTel 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 grace period (such as making or receiving a voice call, sending a text message and/or adding money to the account), PlatinumTel will deactivate Lifeline services for that customer. In addition, PlatinumTel will not seek to recover a Federal Universal Service Fund subsidy for the minutes provided to the

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<sup>40</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶389; 47 USC 54.422(b)(1)-(4).

customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

## **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, PlatinumTel has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

- a) Call Center Scripts – PlatinumTel will emphasize the “one Lifeline phone per household” restriction through its interaction with the potential customer at the call center. (see Exhibit C)
- b) Marketing, Advertising and Website Content – PlatinumTel, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. The following statement will appear in conspicuous place in bold font in an offsetting color, minimum 10 point font, to ensure it is not overlooked. (see Exhibits D-1 & D-2)

***Note: By law, the Lifeline program is only available for one phone per household.***

This statement will also appear on the company’s website ([www.carewireless.com](http://www.carewireless.com)) during the customer information/education cycle. At the point on its website when a customer inputs his/her zip code to verify that Care Wireless/PlatinumTel offers service in their area, PlatinumTel would display the above message in the section where the website explains the service.

Throughout all advertising and marketing material, (1) PlatinumTel clearly identifies the service as a “Lifeline Product”; (2) that By law, the lifeline program is only available for one phone per household; and (3) that customers are required to provide documents demonstrating proof of eligibility (when a state database is not available).

All PlatinumTel personnel assigned to the Care Wireless Lifeline department undergo rigorous training to ensure their understanding of the program, (1) what is required of the applicants; (2) what is required of them; and (3) most importantly, the no tolerance policy regarding waste, fraud, and abuse. Supervisory staff actively monitors agents as they work with applicants to ensure their compliance, as well as making themselves available to answer any customers' questions. Ongoing training for supervisors and staff is conducted monthly by management to review existing procedures, find ways to streamline regulatory compliance processes, address new concerns, and train on new policies issued by the Commission.

PlatinumTel has tailored its internal policies to reflect the goal of eliminated waste, fraud, and abuse. Regulatory and supervisory staff is also required to monitor any new policies issued by the FCC and USAC to ensure immediate adherence and re-training of staff. Staff for events at authorized locations also receive specialized ongoing training and management in order to maintain the strictest observance of Lifeline policies. Event staff and authorized location staff are assigned dedicated personnel that monitor all enrollments and applications using PlatinumTel's proprietary systems (See Exhibit E).

PlatinumTel also takes great pride in its IT group's ability to make sure that all internal and external systems reflect the policies as set by the Commission. The PlatinumTel IT Group has created many proprietary systems, some of which include the ability to process applications from multiple sources, handle duplicative searches within the database (with the ability to connect to outside database sources when available), automatically notify customers of their upcoming annual re-verification, and automatically de-enroll subscribers who fail to re-verify or due to the sixty (60) day non-usage policy. By creating these systems internally, PlatinumTel is

able to easily and quickly modify the system as the Commission defines the rules necessary to eliminate waste, fraud, and abuse.

### **C. Cooperation with state and federal regulators**

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

- Providing state commissions (PUC), the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, PlatinumTel agrees to make available state-specific customer data, including name and address, upon request 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 PlatinumTel'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 PlatinumTel'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.).
- Report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>41</sup>

### **D. Sample Marketing Materials**

PlatinumTel will market its Lifeline plans, containing its own ETC name<sup>42</sup>, Care Wireless, through various media, including through personal contact, print and television advertisements.

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<sup>41</sup> *Id.* at ¶257; 47 USC 54.405(e)(3).

<sup>42</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶275; 47 C.F.R. §54.405(d).

PlatinumTel will incorporate into its Lifeline marketing materials in clear, easily understood language that: (i) the service is supported by Lifeline, a government program; (ii) only eligible consumers may enroll in the program; (iii) specific documentation is necessary for enrollment; and (iv) the benefit is limited to one per household and is no-transferrable.<sup>43</sup>

PlatinumTel marketing materials will reinforce the Commission's rules with respect to the prevention of waste, fraud and abuse. To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, PlatinumTel has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

The following attached exhibits are related to PlatinumTel's customer marketing. A copy of PlatinumTel's Lifeline Application Form is attached as Exhibit B. Exhibit C is the call center script to be used during telephonic customer contacts. Exhibit D-1 contains a sample of PlatinumTel's marketing material. Finally, exhibit D-2 is an additional PlatinumTel sample marketing brochure.

#### **IV. Description of how PlatinumTel will Offer Service**

As one of the oldest prepaid providers in the U.S., PlatinumTel has been a leader in prepaid wireless by offering consumers an affordable product and by making prepaid wireless easy to understand. PlatinumTel's many achievements include innovations that have become industry standards, including, (1) in 2002 developing the first online activation and customer management portal allowing customers and retailers alike the ability to not only buy online, but also purchase airtime, and manage their accounts; (2) in 2001 being the first prepaid wireless carrier to offer prepaid customers with a \$10 top-up option; and (3) offering customers the most

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<sup>43</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶275; 47 C.F.R. §54.405(c).

affordable pay-as-you-go wireless service in the U.S. in 2011. This innovation has helped PlatinumTel grow and be one of the strongest prepaid wireless carriers in the industry. It also translates to providing Lifeline customers with a better overall experience ensuring their understanding of the Lifeline program, giving them access to find the assistance when needed, and the comfort in knowing they are being serviced by an industry leader, pioneer and veteran.

PlatinumTel has been providing prepaid wireless service to customers from lower income backgrounds that generally do not have wireless service because of economic constraints, poor credit history or an inability to enter into a long-term contract since 2001, making it one of the earliest pioneers in prepaid wireless. PlatinumTel does not impose credit checks or long-term service contracts as a prerequisite to obtaining service. Prepaid wireless services have become essential for lower-income customers, providing them with affordable wireless access, including access to emergency services and a reliable means of accessing contacts for family, prospective employers or social services agencies.

PlatinumTel has extensive outreach efforts to providers of social services to low income people in Illinois. The company has outreach programs with numerous churches, non-profit, and community organizations. These organizations assist low income consumers in finding and applying for the appropriate government benefit for their situation. By establishing these partnerships, PlatinumTel is able to educate consumers of the Lifeline program, identify and enroll truly eligible consumers, and create long-lasting community ties. These efforts also reflect PlatinumTel's dedication to reducing waste, fraud and abuse, by aligning with organizations that work with qualified consumers. PlatinumTel believes that this type of community outreach is vital to the success of the Lifeline Program, as it is an effective means of informing consumers about the benefits, and is a great supplement to traditional marketing efforts.

PlatinumTel provides prepaid wireless telecommunications services to consumers by reselling the services of Sprint PCS, which provides wholesale capacity to wireless resellers. Sprint PCS will provide PlatinumTel with the network infrastructure and wireless transmission facilities, allowing PlatinumTel to operate as a Mobile Virtual Network Operator (“MVNO”). As an MVNO, PlatinumTel purchases wireless services directly from the underlying carrier on a wholesale basis for calling, text messaging, broadband and resells those services to customers using its own brand. PlatinumTel’s value proposition enables customers to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly packages of minutes in advance.

In Illinois, PlatinumTel operates, manages and markets all aspects of the customer experience, including in-house U.S. based customer service, 411 directory assistance, international calling, IT services, pricing, the PlatinumTel website, handset procurement, handset logistics, handset selection, service offerings, entertainment applications and marketing materials. PlatinumTel began offering Lifeline services in Illinois in March 2011. The company’s Lifeline package includes not only a free phone, but more minutes and cheaper text messaging rates than other prepaid wireless Lifeline providers. With respect to its handset, PlatinumTel provides a semi-activated handset to its customers. Upon delivering the handset, the customer must activate the service by making an outbound call.

For the last two years PlatinumTel has offered the lowest cost pay-as-you-go wireless services to consumers in the United States. PlatinumTel subscribers may easily de-enroll from Lifeline or disconnect their service altogether. Subscribers can de-enroll at any time by calling the Care Wireless toll free customer service line at 1-855-711-2222.

#### **A. Geographic Area of PlatinumTel’s Service**

PlatinumTel is currently certified as both a facilities based wireline and wireless ETC in Illinois for the non-rural areas of the Illinois Bell Telephone Company (“AT&T Illinois”) territories. PlatinumTel has a pending Petition before this Commission for Eligible Telecommunications Carrier Designation for Low Income Support only for the non-rural areas of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia.<sup>44</sup> PlatinumTel expects to seek additional state Public Utility Commission ETC designations within the coming year.

### **B. Description of Lifeline Service Plan Offerings**

PlatinumTel offers Lifeline customers three different rate plans. Two plans will be free to eligible subscribers, while one will have a monthly charge. PlatinumTel will offer the following three plans:

**300 Free Minutes:** This plan includes 300 free minutes added on the first day of the month. Unused minutes expire on the first day of the month when the account is replenished with the next month’s 300 free minutes. If a subscriber runs out of minutes, they have the option to purchase additional airtime billed at \$.05 per minute and \$.02 per text message

**150 Free Voice Minutes and 50 Free Text Messages:** This plan includes 150 free voice minutes and 50 free text messages added on the first day of the month. Unused minutes and text messages carry over to the next month. If a subscriber runs out of minutes, they have the option to purchase additional airtime billed at \$.05 per minute and \$.02 per text message.

**500 Talk and Text Credit:** Subscribers can purchase the 500 voice minutes and 500 text message monthly bundle for \$10. This plan normally costs \$20.

In addition to free voice services, each PlatinumTel Lifeline plan includes a free handset and free customer calling features, including Caller Identification, Call Waiting, Call Forwarding, 3-Way Calling and Voicemail. All plans include domestic long distance at no extra

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<sup>44</sup> *In the Matter of Telecommunications Carriers Eligible to Receive Universal Service Support, PlatinumTel Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier for Low Income Support Only*, WC Docket No. 09-197 (Submitted August 5, 2011).

per minute charge. Calls to emergency 9-1-1 are always free, irrespective of the status of service activation or availability of minutes.

**C. Other Certifications Required by 47 C.F.R. § 54.202**

The *Public Notice*<sup>45</sup> requires carriers to include certifications required under recently amended 47 C.F.R. § 54.202. PlatinumTel certifies that it does and will continue to comply with the service requirements applicable to the support it receives.<sup>46</sup> Specifically, PlatinumTel's Lifeline services: (i) include voice telephony services that provide voice grade access to the public switched network or its functional equivalent; (ii) provide subscribers with a defined number of minutes of usage for local service at no additional charges; (iii) provide subscribers with access to the emergency services provided by local government or other public safety organizations, such as 911/E911 to the extent the local government in PlatinumTel's service area has implemented 911/E911 systems; and (iv) toll limitation for qualifying low-income consumers.<sup>47</sup>

**V. PlatinumTel has the Financial and Technical Ability to Provide Lifeline Supported Services.**

Paragraph 388 of the *Lifeline and Link Up Reform and Modernization Order* updated the Commission's rules to ensure that Lifeline-only ETCs have the financial and technical ability to offer Lifeline-supported services. PlatinumTel's officers have extensive experience in the telecommunications industry. PlatinumTel's services include voice calling, text messaging,

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<sup>45</sup> *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, DA 12-314 (WCB, rel. Feb. 29, 2012) ("*Public Notice*").

<sup>46</sup> 47 C.F.R. § 54.202(a)(1).

<sup>47</sup> PlatinumTel will meet the requirement to provide toll limitation to Lifeline subscribers by offering service on a prepaid, or pay-as-you-go, basis, as well as toll blocking for international calls. As the Commission found in its grant of ETC designation to Virgin Mobile, "the prepaid nature of [a prepaid wireless carrier's] service offering works as an effective toll control." *Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, 24 FCC Rcd 3381, 3394 at ¶ 34 (2009).

internet access, and broadband. PlatinumTel is certified to provide wireline and wireless telecommunications services in Illinois. The Company has been providing prepaid wireless services in Illinois since 2001. Today, PlatinumTel services prepaid customers nationally on a network that reaches over 270 million people. Additionally, PlatinumTel began providing wireless lifeline services in Illinois in March 2011. PlatinumTel has a strong IT team devoted to the development of unique business services and over the years has maintained a robust and profitable telecommunications operations. The success of PlatinumTel's business is due in large part to the continuity of its highly qualified management team with over 50 years of combined relevant experience. PlatinumTel is one of the oldest and largest prepaid wireless companies in the United States. The company is based in Justice, Illinois and has provided prepaid wireless services since 2001.

The company serves primarily residential consumers, most of who reside in urban and inner-city areas. Many of these consumers do not have bank accounts and have limited available funds to purchase communications services. In Illinois, PlatinumTel uses a combination of its own network facilities as well as reselling the services of Sprint PCS.

#### **VI. PlatinumTel will Comply with the Commission's Reporting Requirements.**

PlatinumTel agrees to annually report the names and identifiers used by PlatinumTel, its holding company, operating companies and affiliates.<sup>48</sup> Additionally, PlatinumTel agrees to provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline Plans for voice telephony service offered specifically for low income consumers

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<sup>48</sup> See *Lifeline and Link Up Reform and Modernization Order* at ¶390.

through the program they offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>49</sup>

The *Lifeline and Link Up Reform and Modernization Order* contains audit requirements for carriers that draw five (5) million dollars or more from the low income program.<sup>50</sup> To the extent this requirement is approved, and PlatinumTel draws \$5 million or more in the aggregate on an annual basis from the low income program, the Company will hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess PlatinumTel's overall compliance with the program's requirements.<sup>51</sup> PlatinumTel will comply with applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.

#### **VII. PlatinumTel will Comply with the Commission's Recordkeeping Requirements.**

PlatinumTel agrees to comply with the recordkeeping requirements outlined in the *Lifeline and Link Up Reform and Modernization Order*. Section 54.417 of the new rules requires all ETCs to "maintain records to document compliance with all Commission and state requirements governing the Lifeline and Linkup program for the three full preceding calendar years and to provide that documentation to the Commission or Administrator upon request."<sup>52</sup> Section 54.417 of the new rules also require all ETCs to "maintain the documentation required in §§54.410(d) (initial eligibility certification) and 54.410(f) (eligibility recertification) for as long

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<sup>49</sup> Id.

<sup>50</sup> Id. at ¶294. As of the date of filing this Compliance Plan, this audit requirement has not yet been approved pursuant to the Paperwork Reduction Act.

<sup>51</sup> *Lifeline and Link Up Reform and Modernization Order* at ¶291.

<sup>52</sup> 47 CFR 54.417(a).

as the subscriber receives Lifeline service from that ETC.”<sup>53</sup> PlatinumTel will therefore maintain records pursuant to §§54.410(d) and 54.410(f) on all individual Lifeline accounts that will be stored for as long as the account is active and for a minimum of three years after the account has been terminated.

### **VIII. Conclusion**

PlatinumTel respectfully submits that this Revised Compliance Plan fully satisfies the conditions set forth in the *Lifeline and Link Up Reform and Modernization Order* and the Commission’s Lifeline rules. Accordingly, PlatinumTel respectfully requests expeditious approval of this Revised Compliance Plan and its related pending ETC Petition in order that PlatinumTel may continue to provide Lifeline service to eligible low-income subscribers in Illinois and expand its Lifeline offering to other eligible customers.

Respectfully submitted,

s/ Thomas H. Rowland  
Thomas H. Rowland  
Kevin D. Rhoda  
Rowland & Moore LLP  
200 West Superior Street  
Suite 400  
Chicago, Illinois 60654

*Counsel to PlatinumTel Communications, LLC*

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<sup>53</sup> Id.

**PlatinumTel List of Exhibits**

Exhibit A	Household Worksheet
Exhibit B	Lifeline Application Form
Exhibit C	Call Center Script
Exhibits D-1 & D-2	Marketing Material
Exhibit E	Internal System View

Exhibit A  
Household Worksheet



Lifeline Household Worksheet

Care Wireless
PO Box 1109
Bridgeview, IL 60455
855-711-2222

Customer First Name: \_\_\_\_\_ Customer Last Name: \_\_\_\_\_
Customer Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_
Customer Email: \_\_\_\_\_ Customer Phone #: \_\_\_\_\_

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you). The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity).

Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings. Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

Section 1

- 1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner, or you live alone)
a. YES
STOP HERE - If you checked YES, you MAY NOT sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.
b. NO
If you checked NO, please CONTINUE to Section 2

Section 2

- 2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?
a. YES
If you checked YES, please CONTINUE to Section 3
b. NO
If you checked NO, please CONTINUE to INITIAL Section 4

Other Adults:

- Parents
• Adult child
• Other adult relative (sibling, aunt, cousin, grandparent, etc.)
• Adult roommate

Section 3

- 3. Do you share living expenses (bills, food, etc.) and share income (your income, the other person's income or both incomes together) with at least one of the adults listed above in Section 2?
a. YES
STOP HERE - If you checked YES, then your address includes only one household. You MAY NOT sign up for Lifeline because someone in your household already receives Lifeline.
b. NO
if you checked NO, then your address includes more than one household. Please initial Sections 4 and 5 below, and sign and date the worksheet.

Section 4

I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Section 5

I certify that I live at an address occupied by multiple households.

CERTIFICATION

Please sign and date this worksheet. Submit this worksheet to Care Wireless along with your Lifeline application.

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

Submit completed form to: enroll@carewireless.com or fax to: 855-722-2022

Exhibit B  
Lifeline Application Form



## FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES

This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

### A Lifeline Product

#### IMPORTANT INFORMATION ABOUT THE LIFELINE PROGRAM

1. The Lifeline Program is a federal benefit
2. Lifeline Service is only available for one line per household. A household cannot receive benefits from multiple providers
3. A household is defined, for the purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

### SECTION 1 – ENTER YOUR PERSONAL INFORMATION HERE

Please **PRINT** your information below (*applications with missing information will not be processed*):

#### RESIDENTIAL ADDRESS (CANNOT BE P.O. Box):

First Name: \_\_\_\_\_ Mi: \_\_\_\_\_ Last Name: \_\_\_\_\_

Last 4 Digits of Social Security #: \_\_\_\_\_ Date of Birth: Month \_\_\_\_ Day \_\_\_\_ Year \_\_\_\_

Address: \_\_\_\_\_ Apt #/Unit #: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_ Zip Code: \_\_\_\_\_ Email Address: \_\_\_\_\_

This address is (*check one*):  Permanent  Temporary  Multi-Household Contact Phone #: \_\_\_\_\_

**\*\*Initial Here if you selected "Temporary" Address**

I will validate this address with Care Wireless every 90 days until I obtain a permanent address.

Initial Here

#### BILLING ADDRESS (if different than above):

Address: \_\_\_\_\_ Apt #/Unit #: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_ Zip Code: \_\_\_\_\_

If you previously selected that your residential address is a temporary address **you are required to re-verify every 90 days** that you continue to rely on that address. Failure to respond to address verification attempts within 30 days will result in de-enrollment from the Lifeline program.

If you should move, you **must** notify Care Wireless within 30 days of moving. You may not use a post office box as your residential address.

### SECTION 2a – Use this section only if you qualify based on participating in the following programs.

#### **SKIP TO SECTION 2b IF YOU QUALIFY BASED ON INCOME LEVEL**

I hereby certify under penalty of perjury that I participate in at least one of the following programs (*check all that apply*):

Initial Here

SNAP / Food Stamps / WIC

Federal Public Housing Assistance / Section 8

Medicaid

Supplemental Security Income / SSI

National School Free Lunch Program

Temporary Assistance to Needy Families / TANF

Bureau of Indian Affairs

Low Income Home Energy Assistance Program / LIHEAP

**You must send a COPY of any current document that proves your participation in one of the programs previously selected. All documents must have the same name and address as provided in this application.**

**Skip to Section 3 if you selected one of the programs above.**

Only one phone per household address allowed regardless of how many government assisted recipients reside at the address. All enrollment forms must have all sections completed, this includes: last 4 numbers of the social security number, date of birth, and it must be signed and dated. *Incomplete forms will not be processed.* There are absolutely no exceptions. Please allow 1-2 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless, PO Box 1109, Bridgeview, IL 60455. Certain restrictions apply. Phone models vary by availability. Service varies by coverage area.



## FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES

This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

### A Lifeline Product

### SECTION 2b – Use this section only if you qualify based on your household income level.

Income Qualification:  
Check this box if your household income is at or below 135% of national poverty level qualifies for Lifeline credit.

There are  individuals in my household.  
(Enter the number of people residing in your household)

# Persons in Household	1	2	3	4	5
135% Annual Income (at or below)	\$15,080	\$20,426	\$25,772	\$31,118	\$36,464
Add \$5,346 for each additional person.					

TO QUALIFY BASED ON YOUR INCOME, YOU MUST PROVIDE COPIES OF ONE OR MORE OF THE DOCUMENTS LISTED BELOW. IF YOU PROVIDE DOCUMENTATION THAT DOES NOT COVER A FULL YEAR (SUCH AS CURRENT PAY STUBS), YOU MUST SUBMIT THREE (3) CONSECUTIVE MONTHS OF THE SAME TYPE OF DOCUMENT WITHIN THE PREVIOUS 12 MONTHS.

- Current income statement from employer or paycheck stub
- Unemployment/Workers Compensation benefits statement
- Retirement/Pension benefit statement
- Prior year's state, federal or tribal tax return
- Social Security benefits statement
- Divorce decree or child support document
- Veterans Administration benefits statement

I certify under penalty of perjury that my household income is at or below 135% of the Federal Poverty Guidelines (FPG)  
Initial Here

*(Note: Proof of income qualification not required during annual re-verification of Lifeline eligibility.)*

Care Wireless is a Lifeline supported service. Lifeline is a federal benefit, and only eligible subscribers may enroll. Customers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is available for only one line per household. A household is defined as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. Violation of the one-per-household rule constitutes a violation of FCC rules, and will result in the Customer's de-enrollment from Lifeline. Lifeline is a non-transferable benefit, and a Customer may not transfer his or her benefit to another person.

### Referred By:

Were you referred by a friend or family member?

Customer's First Name

Customer's Last Name

Care Wireless Phone Number

Only one phone per household address allowed regardless of how many government assisted recipients reside at the address. All enrollment forms must have all sections completed, this includes: last 4 numbers of the social security number, date of birth, and it must be signed and dated. Incomplete forms will not be processed. There are absolutely no exceptions. Please allow 1-2 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless, PO Box 1109, Bridgeview, IL 60455. Certain restrictions apply. Phone models vary by availability. Service varies by coverage area.



## FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES

This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

### A Lifeline Product

### SECTION 3 – INITIAL EACH BOX BELOW

I certify under penalty of perjury to each of the following **(initial each box)**:

- 1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
- 2) I meet the eligibility requirements of the program(s) checked above, or have an annual household income at or below 135% of the Federal Poverty Guidelines
- 3) I am not listed as a dependent on another person's tax return (unless over the age of 60)
- 4) I have provided documentation of eligibility.
- 5) I understand that I and my household can only have one Lifeline-supported telephone service. Care Wireless has explained the one-per-household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government
- 6) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline-supported service from any other land line or wireless company such as Safelink, Assurance, or Reachout Wireless.
- 7) I understand that my Care Wireless Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- 8) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period during which I may use the service or contact Care Wireless to confirm that I want to continue receiving service.
- 9) I will notify Care Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify Care Wireless if:
  - a) I cease to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines;
  - b) I am receiving more than one Lifeline supported service;
  - c) I no longer satisfy the criteria for receiving Lifeline support.
- 10) I will notify Care Wireless within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Care Wireless every ninety (90) days. If I fail to respond to Care Wireless' verification attempts within thirty (30) days, my Care Wireless Lifeline service may be terminated.
- 11) Care Wireless has explained to me that I may be required to re-certify my continued eligibility for Lifeline at any time. If I fail to do so within thirty (30) days, it will result in termination of my Care Wireless Lifeline service.
- 12) I understand, and consent to the fact that my name, telephone number, address, date of birth, last four digits of my social security number, dates of service initiation and/or termination, and qualifying basis for Lifeline service will be provided to the Universal Service Administrative Company, the administrator of the Lifeline program, and/or its agents, for the purpose of verifying that I do not receive more than one Lifeline benefit.
- 13) I authorize Care Wireless to access any records required to verify my statements on this form and to confirm my eligibility. I give permission to the duly authorized official(s) administering the above programs to provide to Care Wireless my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by Care Wireless as confidential customer account information.

### Penalty of Perjury

**Under Title 18 U.S.C. §1621, whoever will state as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.**

Only one phone per household address allowed regardless of how many government assisted recipients reside at the address. All enrollment forms must have all sections completed, this includes: last 4 numbers of the social security number, date of birth, and it must be signed and dated. Incomplete forms will not be processed. There are absolutely no exceptions. Please allow 1-2 weeks for processing and shipping. We can only ship to a residential address and NOT a PO Box. Care Wireless, PO Box 1109, Bridgeview, IL 60455. Certain restrictions apply. Phone models vary by availability. Service varies by coverage area.



## FREE WIRELESS PHONE & FREE 300 MONTHLY AIRTIME MINUTES

This completed form is required in order to enroll you in the Lifeline Program in your state. This authorization form is solely for the purpose of verifying your participation in the programs listed below, and will not be used for any other purpose.

A Lifeline Product

**\*BY LAW THE LIFELINE PROGRAM IS ONLY AVAILABLE FOR ONE PHONE PER HOUSEHOLD, WHETHER LANDLINE OR WIRELESS, NO EXCEPTIONS\***

### SECTION 4 – SIGNATURE REQUIRED

By signing below, I separately affirm and agree to each of the above statements:

\_\_\_\_\_

Applicant Signature

\_\_\_\_\_

Date

### SUBMIT APPLICATION

To submit your application **with required documents**, you may:

**Email to:** enroll@carewireless.com

**Fax to:** 855-722-2022

**Mail to:** P.O. Box 1109  
Bridgeview, IL 60455

#### For Authorized Employee Use Only

CODS ID: \_\_\_\_\_ AGENT USER: \_\_\_\_\_ Shelter/Multi Resident Authorization Code (if applicable): \_\_\_\_\_  
EID: \_\_\_\_\_ CTN: \_\_\_\_\_ ACCT ID: \_\_\_\_\_

Specify Documentation Presented by Customer and Examined by Company Representative:  
\_\_\_\_\_

I certify that I reviewed the appropriate eligibility database to determine the above applicant's Lifeline eligibility status. Should an eligibility database not be available I certify that the above applicant demonstrated their eligibility by providing their eligibility documentation and that such documentation has been reviewed for accuracy and legitimacy.

Store Rep Signature \_\_\_\_\_ Date \_\_\_\_\_

Exhibit C  
Enrollment Script

## Care Wireless Enrollment Script:

**CSR:** Thank you for calling Care Wireless where we provide you with 300 free monthly minutes my name is \_\_\_\_\_ how may I assist you today?

**Caller:** I would like enroll in Care Wireless Lifeline service.

**CSR:** Wonderful, I will be able to assist you in the process. I will need to ask you some questions to get started. Is that ok?

*Before you proceed, please verify customer has social security number. If they do not, unfortunately we cannot provide lifeline service.*

**CSR:** How did you hear about our service?

**CSR:** Are you 18 years old or older?

If Yes, continue

If No, explain that the service is only available to consumers who are at least 18 years old

**CSR:** Do you currently live in the state of Illinois?

If Yes, continue

If No, explain that Care Wireless service is currently only available in the State of Illinois

**CSR:** Are you or anyone in your household currently receiving lifeline benefits for wireless or home phone service? For example, from Safelink or ReachOut Wireless?

If NO, Continue

IF YES, CALLER DOES NOT QUALIFY.

FOLLOW THIS : Sir/ma'am, Lifeline service is limited to one per household. If you would like to receive Lifeline service from Care Wireless, please contact your current Lifeline provider and cancel the service. Once you cancel that service, please contact us to set up Care Wireless service.

**CSR:** Please understand that by law, the Lifeline program is available for only one person per household.

**CSR:** Are you currently participating in any government assistance programs? If so, which one?

If Yes, continue

If No, ask income question:

**CSR:** Is your income at or below 135% of the federal poverty line?

If Yes, ask follow up questions:

**Follow Up 1:** How many individuals are in your household?

**Follow Up 2:** What is the total annual income for everyone in your household?

Use the following table to determine if they are eligible based on income:

# Persons in Household	1	2	3	4	5
135% Annual Income	\$15,080	\$20,426	\$25,772	\$31,118	\$36,464
Add \$5,346 for each additional person in the household					

If qualified based on income inform the customer:

**CSR:** To qualify based on your income, you must provide copies of one or more of the following documents. If you provide documents that do not cover a full year (such as current pay stubs), you must submit 3 consecutive months of the same type of document within the previous 12 months. Are you able to provide this documentation?

If Yes, list the types of documents:

- Current income statement from employer or paycheck stub

- Social Security benefits statement
- Unemployment/Workers Compensation benefits statement
- Divorce decree or child support document
- Retirement/Pension benefit statement
- Veterans Administration benefits statement
- Prior year's state, federal or tribal tax return

If No, applicant does not qualify.

**NOTE:** If applicant does not participate in qualifying government program and does not qualify based on income, please thank the customer and refer them to visit [www.ptel.com](http://www.ptel.com) if they would like to purchase new affordable wireless service.

**CSR:** Participating in \_\_\_\_\_ (say the name of the qualifying program chosen by the customer)

or if qualifying by income:

Your household income...

...may qualify you for Care Wireless Lifeline Service. If approved, Care Wireless Lifeline service will provide you with a free wireless phone with \$15.00 worth of monthly airtime.

**CSR:** May I please have your residential address?

If the address is already in the system please inform:

"The address you have provided is already being used with Care Wireless Lifeline Program. Lifeline Service is available to only one person per household. If you feel that you are an independent, living in your own household, I am able to send you the Care Wireless Lifeline Household Worksheet"

*NOTE: If the customer would like the form please fill out and submit the Google Form "Care Wireless Lifeline Household Form" Advise customer to please complete this worksheet and send it back to us within 14 days of today's date. If we do not receive a completed worksheet indicating that you do indeed qualify for our services, this application will be denied. If we receive a completed worksheet indicating that you do qualify for our services, this application will be approved.*

**CSR:** I would also like to inform you that upon completion of this application you will be required to send in proof of your eligibility for the program you selected (or . You may mail, fax or email your proof to Care Wireless. Please be advised without this documentation you will not receive your Lifeline handset.

-----FILL OUT APPLICATION NOW-----

**CSR:** There are a few more questions that I will need to ask. Please respond with Yes or No to the following questions.

**CSR:**

1. Do you certify under penalty of perjury that the information contained within this application is true and correct and that providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in you being barred from the program?

**Customer must answer YES to continue**

2. You certify that you meet the eligibility requirements of the program you selected, or have an annual household income at or below 135% of the Federal Poverty Guidelines?

**Customer must answer YES to continue**

3. You will provide documentation of eligibility.

**Customer must answer YES to continue**

4. You are not listed as a dependent on another person's tax return (unless you are over the age of 60)  
**Customer must answer YES to continue**
5. You understand that you and your household can only have one Lifeline-supported telephone service. You understand the one-per-household requirement as it has been explained to you. You understand the violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in your de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government?  
**Customer must answer YES to continue**
6. You attest to the best of your knowledge that you and no one in your household is receiving a Lifeline-supported service from any landline or wireless company, such as Safelink, Assurance Wireless, or Reach Out Wireless?  
**Customer must answer YES to continue**
7. You understand that Care Wireless Lifeline service is non-transferable. You may not transfer your service to any individual, including another eligible low-income consumer.  
**Customer must answer YES to continue**
8. You understand that if your service goes unused for 60 days, your service will be suspended, subject to a 30 days period during which you may use your service, or contact Care Wireless to confirm that you want to continue receiving service.  
**Customer must answer YES to continue**
9. You will notify Care Wireless within 30 days if you no longer qualify for Lifeline. You understand this requirement and may be subject to penalties if you fail to notify Care Wireless. Specifically, you will notify Care Wireless if:
  - a. You cease to participate in the federal or state program you selected, or you annual household income exceeds 135% of the Federal Poverty Guidelines
  - b. You are receiving more than one Lifeline supported service
  - c. You no longer satisfy the criteria for receiving Lifeline support**Customer must answer YES to continue**
10. You will notify Care Wireless within 30 days of moving. Additionally, if your address is a temporary address, you understand that you must verify your address with Care Wireless every 90 days. If you fail to respond to Care Wireless verification attempts within 30 days, your Care Wireless service may be terminated.  
**Customer must answer YES to continue**
11. You understand that you may be required to recertify your continued eligibility at any time. If you fail to do so within 30 days, it will result in termination of your Care Wireless Lifeline Service  
**Customer must answer YES to continue**
12. You understand and consent to the fact that your name, telephone number and address will be provided to the Universal Service Administrative Company, the administrator of the Lifeline program, and/or its agents, for the purpose of verifying that you do not receive more than one Lifeline benefit  
**Customer must answer YES to continue**
13. You authorize Care Wireless to access any records required to verify your statements on this form and to confirm your eligibility. You give permission to the duly authorized officials administering the federal & state programs to provide to Care Wireless your participation status in the selected program/programs. You give this permission on the condition that the information in this application and any information about your participation in the selected programs provided by officials be maintained by Care Wireless as confidential account information.  
**Customer must answer YES to continue**

**CSR:** Thank you. We have now completed your Care Wireless Lifeline enrollment. You will receive your phone within 2 weeks, upon approval.

**CSR:** The phone will have \$15.00 worth of airtime which you can use for calling or texting. The rate is \$0.05 per minute and \$0.02 per text message, (it would be 300 minutes OR 750 text messages). Keep in mind your account will be replenished on the first day of every month and you must keep your phone powered on for the first three days of every month for Care Wireless Systems Check (to confirm the account is in use).

**CSR:** Also, once you receive your phone, you must make an outbound call to fully activate your service. From that point, your phone will be active and ready for you to use and your new number can be found on the back of the phone. If at any point you need to add additional minutes, you can purchase minutes with PlatinumTel Wireless. To find a location you can visit their website, [Ptel.com](http://Ptel.com) or our website, [CareWireless.com](http://CareWireless.com). Please be advised that the phone comes with a small pamphlet/insert that explains when you get your airtime, how to check your balance, how much minutes cost, and other useful information. Also, the handset only comes with 30 days of warranty.

**CSR:** Is there anything else I may assist you with today?

If Yes, assist customer in any way possible

If No, Thank you for calling Care Wireless, where we care about keeping you connected.

Exhibits D1 & D2  
Marketing Materials



A Lifeline Product



**FREE PHONE & 300 FREE MONTHLY MINUTES**

**STAY CONNECTED WITH FAMILY & FRIENDS  
APPLY TODAY!**

By Law, the Lifeline Program is only available for one (1) phone per household.

[www.carewireless.com](http://www.carewireless.com)

**NO FEES · NO CONTRACTS · NO BILLS**

**BUSINESS REPLY MAIL**  
FIRST-CLASS MAIL PERMIT NO. 618 BRIDGEVIEW IL  
POSTAGE WILL BE PAID BY ADDRESSEE

**CARE WIRELESS**  
PO BOX 1109  
BRIDGEVIEW IL 60455-9910

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

### the Care Wireless Lifeline Plan

- up to **300** talk minutes
- or
- up to **750** text messages

**FREE EACH MONTH**

#### Need more than 300 minutes?

With Care Wireless you can add as much airtime as you need at the lowest pay-as-you-go rates in the U.S.

<b>TEXT</b> FOR ONLY <b>2¢</b> per SMS	<b>TALK</b> FOR ONLY <b>5¢</b> per min
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Choose a plan to fit your budget!

PLAN	\$10	\$20	\$30	\$50	\$100
MINUTES	up to 200	up to 400	up to 600	up to 1000	up to 2000
ACCESS DAYS	90 days	90 days	180 days	180 days	365 days

To purchase airtime, visit [www.carewireless.com](http://www.carewireless.com) and top-up your account instantly, or to find a location near you.

#### What do you get from Care Wireless?

- A free wireless phone
- 300 free monthly minutes (or up to 750 text messages)
- Free voicemail, caller ID, call waiting
- Free access to 911 **EVEN IF YOU ARE OUT OF AIRTIME**
- Nationwide coverage
- Free nationwide long distance

#### How do you qualify?

To qualify for Care Wireless Lifeline Service you must be enrolled in one of the following programs:

- ✓ SNAP / Food Stamps / WIC
- ✓ Federal Public Housing Assistance - Section 8
- ✓ Supplemental Security Income - SSI
- ✓ Medicaid
- ✓ National School Free Lunch Program
- ✓ Temporary Assistance to Needy Families - TANF
- ✓ Low Income Home Energy Assistance Program - LIHEAP
- ✓ Bureau of Indian Affairs Programs
- ✓ or You may qualify if your household income is at or below 135% of the federal poverty guideline.

**Enroll Online:**  
[www.carewireless.com](http://www.carewireless.com)

By Law, the Lifeline Program is only available for one (1) phone per household.

\*Minutes do not rollover. Any unused minutes will be lost. Care Wireless will replenish your account with \$15.00 of airtime within the first 3 days of each month, so please ensure your phone is turned on and fully charged.

Care Wireless is a Lifeline product that provides customers with a free monthly airtime discount. Care Wireless provides customers with a free wireless phone. Visit [www.carewireless.com](http://www.carewireless.com) for full terms and conditions.

WELCOME  
to CARE  
WIRELESS

## Guide to Care Wireless Service

Thank you for choosing Care Wireless.  
**A Lifeline Product**

Dear Care Wireless Customer,

Congratulations, you have qualified for Care Wireless Service, a government supported program that provides free minutes of airtime each month. And in the event of an emergency, 911 is always a free call.

For complete information on Care Wireless  
visit [www.carewireless.com](http://www.carewireless.com)



**855-711-2222**

[www.carewireless.com](http://www.carewireless.com)

### Getting started with your Care Wireless phone

Your phone is active and ready for you to use.

### Receiving your monthly minutes

Your monthly minutes are loaded onto your account automatically on the first day of every month. In order to receive your monthly minutes **you must have your phone on for the first three (3) days of every month.**

### Keeping your Care Wireless service active every year

In order to keep your Care Wireless Service active, you must verify your service every year. You can do this by simply visiting [carewireless.com](http://carewireless.com) or calling a Care Specialist at 855-711-2222.

### How Care Wireless service works

Using your Care Wireless phone is simple. Every month, we will automatically credit your account with your free airtime.

If you have questions about how you can use your airtime, please visit us online at [www.carewireless.com](http://www.carewireless.com).

### Phone warranty

Your phone comes with a 30 day warranty. If in the first 30 days your phone is not working properly, you may ship your phone back to us and we will send you a replacement. Certain restrictions apply, please contact Care Wireless for details.

Care Wireless is a service provided by PlatinumTel

[www.carewireless.com](http://www.carewireless.com)

care

### Need more airtime?

To add more airtime to your phone, simply purchase PlatinumTel Wireless airtime available at over 36,000 locations in the U.S. To find a location near you visit [www.carewireless.com](http://www.carewireless.com).

PlatinumTel Wireless airtime is also available at all MoneyGram Agent Locations. To find a MoneyGram Agent Location, please visit [moneygram.com/platinumtel](http://moneygram.com/platinumtel).

You can add more airtime to your Care Wireless account by setting up your online account at [www.carewireless.com](http://www.carewireless.com).

### How to check your balance:

There are **2 easy ways** to check your airtime balance:

1. Send a text message to **9080** with the word "**BAL**". This is a free message that will not deduct from your airtime
2. Set up an online account at [www.carewireless.com](http://www.carewireless.com) and log in to check your minute and text usage.

### How much is the airtime?

Care Wireless gives you the lowest pay-as-you-go wireless rates in the U.S. If you purchase additional minutes you will only pay **2¢ per text message** sent and received and **5¢ per voice minute**.

**2¢** per  
SMS  
\*sent or received

**5¢** per  
minute

Please visit us online at [www.carewireless.com](http://www.carewireless.com)  
for the latest and complete terms & conditions

[www.carewireless.com](http://www.carewireless.com)

care

Exhibit E  
Internal System View

## Care Wireless Internal Enrollment Check

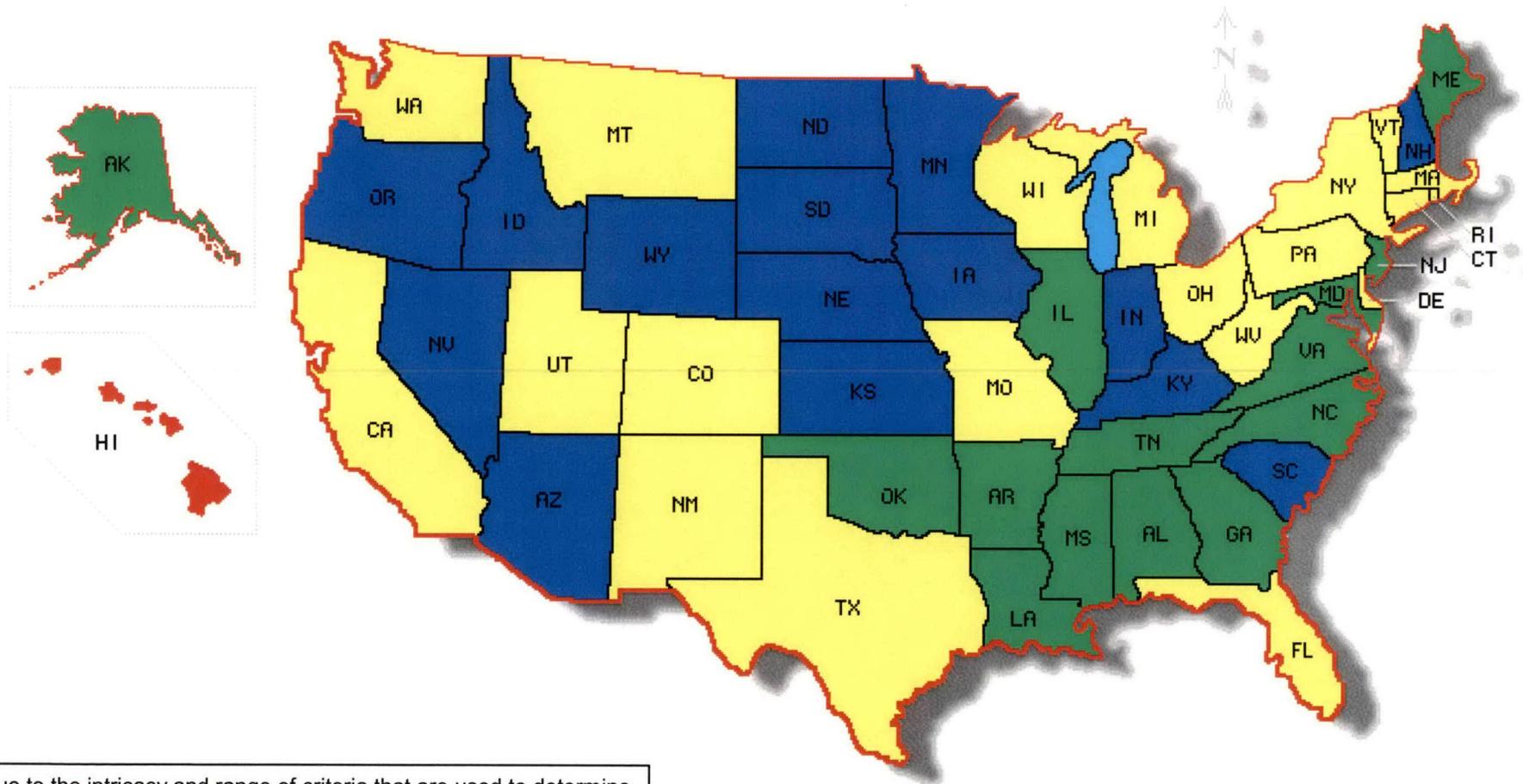
<ul style="list-style-type: none"><li>Config</li><li><b>Enrollee Info</b></li><li>Dealer Info.</li><li>Qualifiers</li><li>Validations</li><li>Acknowledgements</li><li>Documents</li></ul>	<p><b>Enrollment Details</b></p> <p>Name: [REDACTED] Addr. Submitted: [REDACTED] Addr. Sanitized: [REDACTED] : CHICAGO, IL 60619 Contact CTN: Email :</p> <p>Enrollment is checked to:</p> <ul style="list-style-type: none"><li>• Ensure address is valid via USPS</li><li>• Ensure address is not duplicate to existing enrollment</li><li>• Ensure applicant is not currently receiving Lifeline from Care Wireless</li><li>• Verify document(s) submitted demonstrate eligibility</li><li>• Verify that applicant has acknowledged Lifeline terms</li></ul>	<p>With Selected Save</p> <ul style="list-style-type: none"><li>Process</li><li>Purge</li><li>Update Info</li><li>Update Status</li><li>Approve Selection</li><li>Add/View Comments</li><li>CSA Coverage</li><li>Manage Locks</li></ul>
<p><b>Overall Status</b></p> <p>Address : ✓ Terms Ack : ✓ Qualifiers : ✓ Documents : ✓ Overall : ✓</p>		

**EXHIBIT 4**

**2011 Lifeline Participation Rates by State**

## 2011 Lifeline Participation Rates by State

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



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

**EXHIBIT 5**

**Sample Advertisements**

The logo for Care Wireless is a green speech bubble containing the word "care" in white lowercase letters, with "WIRELESS" in black uppercase letters below it. To the right, three green horizontal bars with rounded ends list benefits, each followed by a black circular icon with a white highlight. The background is a blue gradient with a white diagonal line.

**care**  
WIRELESS

**300 Minutes**

**Free Every Month**

**\$15 is loaded onto your account monthly**

 ***Need a better phone?  
Did you know you can upgrade your phone?***

You can purchase a phone with a full keyboard or larger screen. Visit [www.carewireless.com](http://www.carewireless.com) to view one of our many options.



[www.carewireless.com](http://www.carewireless.com)

Care Wireless gives you the lowest pay-as-you-go wireless rates in the U.S.

TALK

5¢/min

TEXT

2¢/sms

#### *Need more airtime?*

You can add more airtime to your account by:

- Setting up an online account and purchasing airtime.
- Dialing 611 from your phone (free call) and speaking with a Care Specialist.
- Visiting a retail location. To find a location near you visit [www.carewireless.com](http://www.carewireless.com).

#### *Text Messages*

International and domestic text messaging for the same rate.

[www.carewireless.com](http://www.carewireless.com)



# Quick Start Guide

Dear Care Wireless Customer:

**Congratulations!** You have qualified for the Care Wireless government supported lifeline program that provides **free minutes** of airtime each month. Our mission is to make wireless available to those that need it, so everyone can stay connected with the people they care about. In the event of an emergency, 911 is always a free call.

1 2 3

## QUICK START GUIDE

### GETTING STARTED.

Your phone is **active and ready** for you to use. To make an outgoing call, dial the area code, phone number and press send. You must dial the area code for all calls.

### MONTHLY MINUTES.

Your free monthly minutes are automatically loaded onto your account on the **first day of every month**. In order to receive your monthly minutes, you must have your phone on for the first 3 days of every month. Free monthly minutes do not carry over.

### KEEPING YOUR CARE WIRELESS SERVICE ACTIVE.

In order to keep your Care Wireless Service active, **you must verify your service every 12 months** from the date of approval. You can do this by simply visiting [www.carewireless.com](http://www.carewireless.com) or calling a Care Specialist at 855-711-2222.

### KEEP YOUR LIFELINE SERVICE ACTIVE BY:

- **Verifying your eligibility annually** or you risk having your lifeline service interrupted or terminated.
- Updating your address or your service may be interrupted or terminated. **You must notify us within 30 days if your address changes.**
- Using your phone or your lifeline service **will be terminated if it is not used for 60 consecutive days.**

### HOW DOES IT WORK?

- **\$15** is loaded onto your account monthly.
- **\$15** gives you **300 minutes** on your account (or up to **750 text messages**).
- Each minute you use will deduct 5¢ from your balance.
- Every text message you send or receive will deduct 2¢ from your balance.
- Should you need additional airtime, you may purchase airtime starting at \$10.

TALK

5¢/min

TEXT

2¢/sms

### CHECK YOUR BALANCE.

You can easily check your balance by:

- 1 Dialing **#225#** from your phone and pressing SEND. You will receive an automated response with your balance. This is a free service.
- 2 Sending a text message to **7801** with the word **"BAL"**. This is a free message that will not deduct from your airtime.
- 3 Setting up an **online account** and checking your minute and text usage.

### HOW DO I SET-UP VOICEMAIL?

- Press and hold the "1" button until "connecting...[Your phone number]" displays on the screen or dial your own mobile number.
- Create a 4-9 digit personal pass code and press #.
- Record your name (10 seconds) and press #.
- Record your personal greeting (30 seconds) or select another greeting option.
- You can turn One-Touch access on or off (Note: When turned on, you don't have to enter your pass code to check your voicemail from your cell phone).

### WHAT IF I CANCEL MY SERVICE OR I AM NOT ELIGIBLE TO RECEIVE LIFELINE SERVICE?

If you cancel your service or are not eligible to receive lifeline, you may still keep your Care Wireless phone and continue to add airtime by purchasing PlatinumTel airtime from [www.carewireless.com](http://www.carewireless.com).

### PHONE WARRANTY.

Your phone comes with a **30 day warranty**. Phones not working properly can be returned back to us within the first 30 days the phone was delivered with less than 300 minutes of airtime used. Upon receipt, we will send you a replacement.

**Lost/stolen/damaged phones are not replaceable.** Certain restrictions apply, please contact Care Wireless for details.

### WHAT IF MY PHONE IS DEFECTIVE?

Contact our customer service department at **855-711-2222** to confirm you are eligible for a warranty replacement. Additional instructions will be provided on how to handle warranty exchanges. Please note that the warranty will be void if products returned are physically damaged or not packed properly.

Visit us online at [www.carewireless.com](http://www.carewireless.com) for additional information about Care Wireless and for the latest and complete terms and conditions.

Dial 611 or  
855.711.2222  
WE CARE!

QUESTIONS?  
CONCERNS?  
SUGGESTIONS?

**Exhibit 6**

**Key Management Resumes**

**Suleiman Abueid**  
**1000 W. Washington Blvd, Ste 518**  
**Chicago, IL 60607**  
**708-458-9999**  
**sam.abueid@ptel.com**

**SKILLS SUMMARY:** Senior President with extensive experience in Telecommunications, Real Estate, Retail, and other industries. Extensive background in management and administration through years of experience.

**RELEVANT EXPERIENCE**

**09/01 – Present**                      **PlatinumTel Communications, LLC**                      **President, Partner**  
*Justice, IL*

- Interface with day-to-day activities including communications with vendors, cash flows, managers, etc.
- Develop a system and procedures to create a liaison between the multiple related LLCs to increase efficiency and effectiveness and facilitate related services.
- Coordinate marketing studies with outside consultants for budgeting purposes.
- Increase profitability through continuous efforts to explore cost efficient opportunities utilizing personal skills and outside consultants.

**01/05 – Present**                      **HBS Labs, LLC**                      **President, Partner**  
*Justice, IL*

- Handle various administration and supervision over the IT operations utilizing telecommunications experience.

**01/05 – Present**                      **Titanium Properties, LLC**                      **President, Partner**  
*Justice, IL*

- Administration and management of all properties in Chicago Land area.
- Explore opportunities for future real estate investments.

**Omar Aqel**  
**16133 S. 118th Avenue**  
**Orland Park, IL 60467**  
**708-458-9999**  
**omar.aqel@ptel.com**

**SKILLS SUMMARY** Senior Vice-President with extensive experience in the Telecommunication and other industries. Excellent background in management and administration through years of experience.

**EMPLOYMENT**      **Vice President, Partner**      September 2001-Present  
**PlatinumTel Communications, LLC.**  
*Justice, IL*

- Interface with day-to-day activities including communications with suppliers, cash flows, employees, etc.
- Coordinate and supervise operations among various departments.
- Coordinate marketing studies with outside consultants for budgeting purposes.
- Increase profitability through continuous efforts to explore cost efficient opportunities utilizing personal skills and outside consultants.

**Vice-President, Partner**      January 2005-Present  
**Titanium Properties, LLC**  
*Justice, IL*

- Administer and manage the activities of Titanium properties in Chicago Land area.
- Explore opportunities for future real estate investments.

**Vice-President, Partner**      January 2005-Present  
**HBS Labs, LLC**  
*Justice, IL*

- Administer and supervise over the daily operations of the business.
- Coordinate activities and communications with other companies.

**Corporate Treasurer**  
**Sinjel & Baker Enterprises, Inc.**      October 1994 – December 2000  
*Hickory Hills, IL*

- Handled complete administration, supervision, and finances over the operations of the food distribution in Chicago area.

**Manager**      1990-1994  
**Quality Foods**  
*Chicago, IL*

- Handle complete administration and supervision over the operations of the Supermarket in Chicago area.

**Omar Ahmad**  
**13131 S 80th Ct.**  
**Palos Park, IL 60464**  
**708-458-9999**  
**omar.ahmad@ptel.com**

**SKILLS SUMMARY** Senior Vice-President with extensive experience in the Telecommunication industry. Excellent background in management and administration through years of experience.

**EMPLOYMENT** **CEO, Partner** September 2001-Present  
**PlatinumTel Communications, LLC.**  
*Justice, IL*

- Interface with day-to-day activities including communications with suppliers, cash flows, employees, etc.
- Develop a system and procedures to create a liaison between the multiple sister LLCs to increase efficiency and effectiveness and facilitate related services.
- Coordinate marketing studies with outside consultants for budgeting purposes.
- Increase profitability through continuous efforts to explore cost efficient opportunities utilizing personal skills and outside consultants.

**CEO, Partner** January 2005-Present  
**Titanium Properties, LLC**  
*Justice, IL*

- Administration and management of Titanium properties in Chicago Land area.
- Explore opportunities for future real estate investments.

**CEO, Partner** January 2005-Present  
**HBS Labs, LLC**  
*Justice, IL*

- Handle the administration and supervision over the operation of the IT company.

**CEO, Partner** March 2005 –December 2012  
**Yetma & Tira Investments, LLC.**  
*Justice, IL*

- Evaluate contractors' bidding on construction projects.
- Oversee the construction of residential units in Chicago area.
- Explore opportunities for future real estate investments.

**Exhibit 7**

**Wire Centers**

CLLI CODE	COMPANY NAME	WIRE CENTERS
LACTKYXA	BALLARD RURAL TELEPHONE COOP. CORP., INC.	KEVIL
LACTKYXA	BALLARD RURAL TELEPHONE COOP. CORP., INC.	LA CENTER
LACTKYXA	BALLARD RURAL TELEPHONE COOP. CORP., INC.	GAGE
LACTKYXA	BALLARD RURAL TELEPHONE COOP. CORP., INC.	HEATH
LACTKYXA	BALLARD RURAL TELEPHONE COOP. CORP., INC.	WICKLIFFE
ALLNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ALLEN
AURRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	AURORA
BDFRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BEDFORD
BGDDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BAGDAD
BLFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BLOOMFIELD
BNLYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BENHAMLNCH
BNTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BENTON
BRGNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BURGIN
BRMNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BREMEN
BRTWKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BARDSTOWN
BVDMKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BEAVER DAM
BWLGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLINGGREN
BWLGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WOODBURN
BWLGKYRV	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLINGGREN
BYVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BEATTYVL
CADZKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CADIZ
CHPLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CHAPLIN
CLAYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLAY
CLHNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CALHOUN
CLPTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLOVERPORT
CLTNKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CLINTON
CMBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CAMPBELSBG
CNCYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CENTRAL CY
CNTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CANTON
CNTWKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CENTERTOWN
COTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CROFTON
CRBNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORBIN
CRBOKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CRAB ORCH
CRLSKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CARLISLE
CRTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CARROLLTON
CYDNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORYDON
CYNTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CYNTHIANA
DAVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DANVILLE
DIXNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DIXON
DRBOKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DRAKESBORO
DWSPKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	DAWSON SPG
EDVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EDDYVILLE
EKTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELKTON
ELCYKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ELKHORN CY
EMNNKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMINENCE
EMNNKYPL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMINENCE

CLLI CODE	COMPANY NAME	WIRE CENTERS
EMNNKYPL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CROPPER
ERTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EARLINGTON
FDCKKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FEDSCREEK
FDVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FORDSVILLE
FEBRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FREEBURN
FEBRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCCARR
FKLNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKLIN
FLTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CAYCE
FLTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FULTON
FLTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WATER VLY
FNVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FINCHVILLE
FORDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FORD
FRDNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FREDONIA
FRFTKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT
FRFTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	FRANKFORT
GBVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GILBERTSVL
GHNTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GHENT
GNVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GREENVILLE
GRACKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GRACEY
GRTWKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GEORGETOWN
GTHRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	GUTHRIE
HABTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HABIT
HANSKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HANSON
HCMNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HICKMAN
HDBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARRODSBG
HDBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	CORNISHVL
HNSNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HENDERSON
HPVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HOPKINSVL
HRBGKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARDINSBG
HRFRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARTFORD
HRLNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HARLAN
HWVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	HAWESVILLE
INEZKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	INEZ
ISLDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ISLAND
JLLCTNMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JELICO
JNCYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	JUNCTIONCY
LBJTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LEBANONJCT
LFYTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LA FAYETTE
LGRNKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LA GRANGE
LOUSKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISA
LRBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LAWRENCEBG
LSVLKY26	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYAN	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYAP	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYBE	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYBR	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE

<b>CLLI CODE</b>	<b>COMPANY NAME</b>	<b>WIRE CENTERS</b>
LSVLKYCW	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYFC	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYHA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYJT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYO	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYSH	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYSL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYSM	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYTS	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYVS	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LSVLKYWE	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LOUISVILLE
LVMRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	LIVERMORE
MACEKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MACEO
MARNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MARION
MARTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MARTIN
MCDNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCDANIELS
MCWLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MCDOWELL
MDBOKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MIDDLESBO
MDVIKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MADISONVL
MGFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORGANFLD
MGTWKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORGANTOWN
MLBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MILLERBURG
MLTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MILTON
MRGPKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MORTONSGAP
MRRYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MURRAY
MTEDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MOUNT EDEN
MTSTKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MTSTERLING
MYFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MAYFIELD
MYVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MAYSVILLE
NEBOKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEBO
NEONKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEON
NRVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NORTONVL
NWHNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEW HAVEN
OKGVKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OAK GROVE
OWBOKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWENSBORO
OWTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NEWLIBERTY
OWTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	OWENTON
PARSKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	NOMIDDLETN
PARSKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PARIS
PDCHKYIP	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH
PDCHKYLO	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH
PDCHKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH
PDCHKYRL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PADUCAH
PDCHKYRL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SYMSONIA
PIVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PINEVILLE
PKVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE

CLLI CODE	COMPANY NAME	WIRE CENTERS
PKVLK YMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE
PMBRK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PEMBROKE
PNVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PAINTSVL
PRBGK YES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRESTONSBG
PRTNK YES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRINCETON
PRVDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PROVIDENCE
PRVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PERRYVILLE
PTRYK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PORT ROYAL
RBRDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROBARDS
RCMDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND
RLVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RUSSELLVL
RSTRK YES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROSETRRACE
SCRMK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SACRAMENTO
SDVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SADIEVILLE
SEBRK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SEBREE
SHGVK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHARON GRV
SHVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHELBYVL
SLGHK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLAUGHTERS
SLPHK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SULPHUR
SLVSK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SALVISA
SNTNK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANTON
SPFDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MACKVILLE
SPFDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MOORESVL
SPFDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGFLD
SSVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SIMPSONVL
STCHK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ST CHARLES
STFRK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANFORD
STGRK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STAMPNGRND
STNLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANLEY
STONK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STONE
STRGK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STURGIS
SWSNK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SOWILLIMSN
TRENK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TRENTON
TYVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TAYLORSVL
UTICK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	UTICA
VIRGK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	VIRGIE
WACOK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WACO
WDDYK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WADDY
WHBGK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESBURG
WHVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESVL
WLBGK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLIAMSBG
WLVLK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	W LOUISVL
WNCHK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER
WNCHK YPV	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER
WRFDK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WARFIELD
WSBGK YMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLISBURG

CLLI CODE	COMPANY NAME	WIRE CENTERS
WSPNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WEST POINT
WYLDKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WAYLAND
BRBGKYXA	BRANDENBURG TELEPHONE CO.	BRANDENBG
BTTWKYXA	BRANDENBURG TELEPHONE CO.	BATTLETOWN
CSTRKYXA	BRANDENBURG TELEPHONE CO.	CUSTER
IVTNKYXA	BRANDENBURG TELEPHONE CO.	IRVINGTON
NGRTKYXA	BRANDENBURG TELEPHONE CO.	NO GARRETT
RDCLKYAA	BRANDENBURG TELEPHONE CO.	RADCLIFF
RDCLKYXA	BRANDENBURG TELEPHONE CO.	RADCLIFF
VNGVKYXA	BRANDENBURG TELEPHONE CO.	VINE GROVE
ALXNKYAL	CINCINNATI BELL, INC.	ALEXANDRIA
BTLRKYBR	CINCINNATI BELL, INC.	BUTLER
BURLKYBN	CINCINNATI BELL, INC.	BOONE
CRTDKYCT	CINCINNATI BELL, INC.	WILLIAMSTN
CVTNKYCN	CINCINNATI BELL, INC.	COVINGTON
FLMOKYUA	CINCINNATI BELL, INC.	FALMOUTH
FLRNKYFL	CINCINNATI BELL, INC.	COVINGTON
FLRNKYFL	CINCINNATI BELL, INC.	BOONE
FTTHKYFT	CINCINNATI BELL, INC.	COVINGTON
GLCOKYGC	CINCINNATI BELL, INC.	GLENCOE
INDPKYIN	CINCINNATI BELL, INC.	INDEPNDCN
LKPKKYP	CINCINNATI BELL, INC.	COVINGTON
UNINKYAC	CINCINNATI BELL, INC.	BOONE
WLTNKYWL	CINCINNATI BELL, INC.	WALTON
WLTWKYWT	CINCINNATI BELL, INC.	WILLIAMSTN
WRSWKYWR	CINCINNATI BELL, INC.	WARSAW
RSSPKYXA	DUO COUNTY TELEPHONE COOPERATIVE, INC.	JAMESTOWN
RSSPKYXA	DUO COUNTY TELEPHONE COOPERATIVE, INC.	RUSSELLSPG
RSSPKYXA	DUO COUNTY TELEPHONE COOPERATIVE, INC.	FAIRPLAY
RSSPKYXA	DUO COUNTY TELEPHONE COOPERATIVE, INC.	BRKSVL RUL
BLANKYXA	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	BLAINE
CPMNKYXA	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	CHAPMAN
FLBGKYXA	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	FALLSBURG
FLGPKYXA	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	FLAT GAP
RYTNKYXA	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	ROYALTON
SFVLKY01	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	STAFORDSVL
SLVLKYXA	FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.	SALYERSVL
GRTHKYXE	GEARHEART COMM. CO, INC. DBA COALFIELDS TELEPHONE	GRETHEL
HRLDKYXE	GEARHEART COMM. CO, INC. DBA COALFIELDS TELEPHONE	HAROLD
WHLWKYXA	GEARHEART COMM. CO, INC. DBA COALFIELDS TELEPHONE	WHEELWRIHT
PNKNKYXA	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY	PINE KNOT
STRNKYXA	HIGHLAND TELEPHONE COOPERATIVE, INC. - KY	STNSWHLYCY
BCKHKYXE	LESLIE COUNTY TELEPHONE CO.	BUCKHORN
BLDSKYXA	LESLIE COUNTY TELEPHONE CO.	BLEDSE
HYDNKYXA	LESLIE COUNTY TELEPHONE CO.	HYDEN
STNTKYXA	LESLIE COUNTY TELEPHONE CO.	STINNETT

CLLI CODE	COMPANY NAME	WIRE CENTERS
WOTNKYXA	LESLIE COUNTY TELEPHONE CO.	WOOTON
LWPTKYXA	LEWISPORT TELEPHONE CO., INC.	LEWISPORT
AUBNKYXA	LOGAN TELEPHONE COOPERATIVE, INC.	ADAIRVILLE
AUBNKYXA	LOGAN TELEPHONE COOPERATIVE, INC.	AUBURN
AUBNKYXA	LOGAN TELEPHONE COOPERATIVE, INC.	ROCHESTER
AUBNKYXA	LOGAN TELEPHONE COOPERATIVE, INC.	LEWISBRG
AUBNKYXA	LOGAN TELEPHONE COOPERATIVE, INC.	LOGANSPORT
AUBNKYXA	LOGAN TELEPHONE COOPERATIVE, INC.	DUNMOR
CMTNKYXA	MOUNTAIN RURAL TELEPHONE COOPERATIVE	CAMPTON
FRBGKYXA	MOUNTAIN RURAL TELEPHONE COOPERATIVE	FRENCHBURG
WLBTKYXA	MOUNTAIN RURAL TELEPHONE COOPERATIVE	W LIBERTY
ANVLKYXA	PEOPLES RURAL TELEPHONE COOPERATIVE CORP.	ANNVILLE
BNVLKYXA	PEOPLES RURAL TELEPHONE COOPERATIVE CORP.	BOONEVILLE
MCCKEYXA	PEOPLES RURAL TELEPHONE COOPERATIVE CORP.	MCKEE
SNDGKYXA	PEOPLES RURAL TELEPHONE COOPERATIVE CORP.	SANDGAP
SALMKYXA	SALEM TELEPHONE CO.	SALEM
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	SUMMERSHAD
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	EDMONTON
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	FOUNTANRUN
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	GAMALIEL
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	TEMPLEHILL
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	GLASGWRURL
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	HISEVILLE
GLSGKYXR	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	LUCAS
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CAVE CITY
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CENTER
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	BONNIEVL
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	BUFFALO
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	CANMER
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	HORSE CAVE
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	MAGNOLIA
HRCVKYXA	SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.	MUNFORDVL
CODYKYXA	THACKER/GRIGSBY TELEPHONE CO.	CODY
HNMNKYXB	THACKER/GRIGSBY TELEPHONE CO.	HINDMAN
MOUSKYXA	THACKER/GRIGSBY TELEPHONE CO.	MOUSIE
TPMSKYXA	THACKER/GRIGSBY TELEPHONE CO.	TOPMOST
FLDLKY01	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	FOLSOMDALE
FRNGKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	FAIRDEALNG
FRTNKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	FARMINGTON
HAZLKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	HAZEL
HRDNKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	HARDIN
KRKSXYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	KIRKSEY
LYGVKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	LYNN GROVE
NWCNKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	NEWCONCORD
WINGKYXA	WEST KENTUCKY RURAL TELEPHONE COOP. CORP., INC.	WINGO
ALBYKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	ALBANY

CLLI CODE	COMPANY NAME	WIRE CENTERS
BEREKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BEREA
BRSDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BURNSIDE
BRVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BRADFODSVL
BSVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BURKESVL
BTVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	BRYANTSVL
CECLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	CECILIA
CLMAKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	COLUMBIA
CMVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	CAMPBELSVL
EWNGKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	EWING
EZTWKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	ELIZABHTN
FMBGKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	FLEMINGSBG
GLSGKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GLASGOW
GNBGKYXB	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GREENSBURG
GNUPKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GREENUP
GRSNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	GARRISON
HGVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HODGENVL
HLBOKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HILLSBORO
HTVLKYXE	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HUSTONVL
HZRDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	HAZARD
LBNNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEBANON
LBRTKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LIBERTY
LNCSKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LANCASTER
LRTTKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LORETTO
LTFDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEITCHFLD
LTWDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEATHERWD
LXTNKYUK	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXB	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXC	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXD	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXE	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXF	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
LXTNKYXG	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	LEXINGTON
MDWYKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MIDWAY
MNTIKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MONTICELLO
MRHDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	MOREHEAD
NANCKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	NANCY
NCVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	NICHOLASVL
OWVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	OWINGSVL
PNLCKYXE	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	PAINT LICK
RSSLKYXB	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	RUSSELL
SCVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SCOTTSVL
SHBGKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SHARPSBURG
SHDNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SO HARDIN
SLLCKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SALT LICK
SMRTKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SOMERSET

<b>CLLI CODE</b>	<b>COMPANY NAME</b>	<b>WIRE CENTERS</b>
SSHRKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	SOUTHSHORE
TLBOKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	TOLLESBORO
TMVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	TOMPKINSVL
VICCKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	VICCO
VNBGKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	VANCEBURG
VRSLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	VERSAILLES
WLMRKYXA	WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	WILMORE
AGSTKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	AUGUSTA
ARTNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	ARLINGTON
BBVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	BARBOURVL
BESPKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	BEE SPRING
BKVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	BROOKSVL
BRHDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	BRODHEAD
BWVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	BROWNSVL
CKSNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	CLARKSON
CLCTKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	CALVERT CY
CMLDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	CUMBERLAND
CYVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	CANEYVILLE
EBNKKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	EUBANK
EBRNKYAC	WINDSTREAM KENTUCKY EAST, INC. - LONDON	EBERNSTADT
FBSHKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	FAUBUSH
FLLCKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	FLAT LICK
FRNLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	FERNLEAF
IRVNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	IRVINE
JHVLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	JOHNSVILLE
JNKNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	JENKINS
LONDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	LONDON
LVTNKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	LIVINGSTON
MMCVKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	MAMOTHCAVE
MNCHKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	MANCHESTER
MTOLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	MT OLIVET
MTVRKYAI	WINDSTREAM KENTUCKY EAST, INC. - LONDON	MT VERNON
MYLCKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	MAYS LICK
ONEDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	ONEIDA
PRCYKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	PARK CITY
SCHLKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	SCIENCE HL
SMGVKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	SMITHS GRV
SMLDKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	SMITHLAND
UNTWKYXA	WINDSTREAM KENTUCKY EAST, INC. - LONDON	UNIONTOWN
MTWSKYXA	WINDSTREAM KENTUCKY WEST, INC.	MTWASHIGTN
SHPVKYXA	WINDSTREAM KENTUCKY WEST, INC.	SHEPHERDSVL
ZNTNKYXA	WINDSTREAM KENTUCKY WEST, INC.	ZONETON