

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

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In the Matter of the Application of	)	
Global Connection Inc. of America d/b/a	)	
STAND UP WIRELESS to Expand its	)	Case No.2024-00218
Eligible Telecommunications Carrier	)	
Service Area	)	

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**APPLICATION OF GLOBAL CONNECTION INC. OF AMERICA  
D/B/A STAND UP WIRELESS TO EXPAND ITS  
ELIGIBLE TELECOMMUNICATIONS CARRIER SERVICE AREA**

**I. INTRODUCTION**

Global Connection Inc. of America d/b/a STAND UP WIRELESS (“STANDUP” 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 Kentucky Public Service Commission’s (“Commission”) rules and regulations, hereby files this application to expand STANDUP’s Eligible Telecommunications Carrier (“ETC”) service area in the State of Kentucky (“Application”). STANDUP was designated as a Lifeline-only ETC by the Commission by Order entered August 7, 2013 in Case No. 2013-00051 (“ETC Designation Order”) for purposes of receiving both federal low-income Universal Service Fund (“USF”) and Kentucky Universal Service Fund (“KUSF”) support. STANDUP requests to expand its ETC service area solely to provide Lifeline service to additional qualifying Kentucky households. The Company does not seek access to USF support for the purpose of providing service under the high-cost program.<sup>3</sup>

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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.

<sup>3</sup> Given that STANDUP 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 STANDUP.

As demonstrated herein, and as certified by Exhibit 1 attached hereto, STANDUP continues to meet all statutory and regulatory requirements for designation as an ETC, including the requirements outlined in the FCC's *Lifeline Modernization Order*.<sup>4</sup> Rapid grant of STANDUP's request would advance the public interest by enabling the Company to expand the availability of Lifeline service to more low-income consumers in Kentucky. Accordingly, STANDUP respectfully requests that the Commission expeditiously approve this Application.

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

Matthew Malone (KBA 90508)  
Attorney At Law  
Hurt, Deckard & May, PLLC  
106 W. Vine Street; Suite 401  
Lexington, Kentucky 40507  
Direct Dial: (859) 254-0000  
Direct Fax: (859) 254-4763  
Web: [mmalone@hdmfirm.com](mailto:mmalone@hdmfirm.com)

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<sup>4</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 00-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*Third Report and Order*" or "*Lifeline Modernization Order*").

## **II. DESIGNATED SERVICE AREA**

In the ETC Designation Order, the Commission designated STANDUP as an ETC to provide wireless Lifeline service “in the underlying carrier's licensed service area in Kentucky” (Ordering Paragraph No. 2), referencing STANDUP’s request for designation within the non-rural exchanges of BellSouth Telecommunications, LLC dba AT&T Kentucky, Cincinnati Bell Telephone Company and Windstream Kentucky East, LLC.” At the time of its ETC designation, STANDUP was utilizing Verizon and Sprint as its underlying carriers. Sprint has since merged with T-Mobile USA, Inc. (“T-Mobile”) and STANDUP does not currently provide service using the Verizon network. As a reseller of T-Mobile’s services, STANDUP and its customers benefit from T-Mobile’s ability to remain functional in emergency situations, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

STANDUP seeks to revise its ETC designated service area to be statewide subject to the wireless network coverage of its underlying carriers, including as it may expand going forward. STANDUP’s ETC service area would thus include the following additional areas listed in attached Exhibit 2.

## **III. STANDUP MEETS APPLICABLE REQUIREMENTS**

FCC rules, 47 C.F.R. §§ 54.201-54.202 (the “FCC ETC Rules”), set forth the information that must be contained in an application for designation as an ETC. In its initial ETC Application filed in Case No. 2013-00051 (“ETC Application”), incorporated herein by reference, STANDUP provided all of the information required by FCC ETC Rules in effect at the time, including those

set forth in the FCC's *Lifeline Reform Order*.<sup>5</sup> The Commission found in its ETC Designation Order that STANDUP met the requirements for designation as an ETC. STANDUP has complied with the conditions of its ETC designation and will continue to do so. In accordance with 47 C.F.R. § 54.202(a)(1)(i) and by the attached certification, STANDUP certifies that it will comply with the service requirements applicable to the support that it receives. STANDUP hereby also provides additional and updated information as a result of the FCC's *Lifeline Modernization Order*, which was issued after the Company's ETC Designation Order.

**A. Provision of Supported Services**

STANDUP is able to provide all services 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 its requested service area in the State of Kentucky, including broadband Internet access service. STANDUP commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. Further, STANDUP's Lifeline offering will meet any additional requirements to qualify for KUSF support. The Company's current Lifeline offering is attached hereto as Exhibit 3.<sup>6</sup> STANDUP currently offers these Lifeline wireless plans throughout its existing service area in Kentucky.

**B. Eligibility Verification**

STANDUP determines eligibility of Lifeline subscribers in accordance with 47 C.F.R. § 54.410, utilizing the streamlined eligibility criteria implemented by the *Lifeline Modernization Order* (see 47 C.F.R. § 54.409). The FCC has taken steps to curb abuse in the Lifeline program

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<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 Reform Order*").

<sup>6</sup> The Company's terms and conditions can be found at <https://standupwireless.com/terms-conditions/>.

by establishing the National Lifeline Eligibility Verifier (“National Verifier”) which transfers the responsibility of eligibility determination away from Lifeline providers.<sup>7</sup> STANDUP will rely on the National Verifier to determine initial and ongoing eligibility of Kentucky Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database (“NLAD”) for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from STANDUP or any other ETC, and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service. As such, STANDUP complies with the requirements of 47 C.F.R. §54.404.

### **C. Non-Usage Policy**

STANDUP has updated its non-usage policy in compliance with changes in federal regulations. STANDUP will not seek reimbursement from the USF for inactive subscribers and will de-enroll any subscriber that has not used the Company’s Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as “usage” is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), STANDUP will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber’s failure to use the Lifeline service within the notice period will result in service termination for non-usage.

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<sup>7</sup> See *Lifeline Modernization Order*, section III.C.

#### **IV. EXPANSION OF STANDUP'S ETC SERVICE AREA WOULD PROMOTE THE PUBLIC INTEREST**

In its ETC Designation Order, the Commission found that designation of STANDUP as an ETC would serve the public interest. Expansion of STANDUP's ETC service area will increase the number of low-income individuals that can benefit from the advantages offered by the Company's Lifeline service, ensuring they have access to wholly-supported or discounted wireless voice and broadband service, and will thus further the public interest by providing more low-income Kentucky consumers with low-priced and high-quality services. STANDUP's prepaid wireless plans enable consumers to enjoy the benefits of wireless telecommunication and mobile broadband access without being subject to extensive credit reviews and long-term service commitments, which historically have prevented many low-income Americans from reaping the full benefits of the intensely competitive wireless market.

STANDUP offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. STANDUP's Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (with current plan options meeting the voice *and* broadband minimum service standards), at no net cost to the customer after application of Lifeline and KUSF support. In today's market, 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 greater ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers

regardless of location. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.

Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing STANDUP with the authority necessary to offer discounted Lifeline services to eligible residents in additional areas of Kentucky undoubtedly promotes the public interest.

## **V. CONCLUSION**

STANDUP submits that the information contained herein, together with the information in the Company's ETC Application, incorporated herein by reference, demonstrates that STANDUP continues to meet the requirements for ETC designation and that expansion of STANDUP's ETC service area would promote the public interest.

WHEREFORE, STANDUP respectfully requests that the Commission promptly grant this Application and expand STANDUP's Lifeline-only ETC service area as requested herein.

Respectfully submitted,

*s/ Matthew Malone*

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Matthew Malone (KBA 90508)  
Attorney At Law  
Hurt, Deckard & May, PLLC  
106 W. Vine Street; Suite 401  
Lexington, Kentucky 40507  
Direct Dial: (859) 254-0000  
Direct Fax: (859) 254-4763  
Web: [mmalone@hdmfirm.com](mailto:mmalone@hdmfirm.com)

*Attorney for* Global Connection Inc. of America d/b/a  
STAND UP WIRELESS

July 3, 2024

**EXHIBIT 1**

**CERTIFICATION**

## **EXHIBIT 2**

### **Coverage Area**

**Proposed ETC Service Area:**

Statewide, subject to the wireless network coverage of STANDUP's underlying carrier(s), including as it may expand going forward

**Covered ILECs** *(at time of filing):*

**Existing:**

**(Non-Rural)**

BELLSOUTH TELECOMM/AT&T
CINCINNATI BELL
WINDSTREAM KENTUCKY EAST

**Additional:**

BALLARD RURAL TELEPHONE COOP. CORP., INC.
BRANDENBURG TELEPHONE CO.
DUO COUNTY TELEPHONE COOPERATIVE, INC.
FOOTHILLS RURAL TELEPHONE COOPERATIVE CORP.
GEARHEART COMM. CO, INC. DBA COALFIELDS TELEPHONE
HIGHLAND TELEPHONE COOPERATIVE, INC. - KY
LESLIE COUNTY TELEPHONE CO.
LEWISPORT TELEPHONE CO., INC.
LOGAN TELEPHONE COOPERATIVE, INC.
MOUNTAIN RURAL TELEPHONE COOPERATIVE
NORTH CENTRAL TEL. COOP.
PEOPLES RURAL TELEPHONE COOPERATIVE CORP.
SALEM TELEPHONE CO.
SOUTH CENTRAL RURAL TELEPHONE COOP. CORP, INC.
THACKER/GRIGSBY TELEPHONE CO.
WEST KENTUCKY RURAL TELEPHONE
WINDSTREAM KENTUCKY WEST, INC.

**EXHIBIT 3**

**Current Lifeline Offering**

**STANDUP WIRELESS  
KENTUCKY LIFELINE OFFERING**

**KENTUCKY ENHANCED LIFELINE PLAN**

Unlimited anytime minutes per month

Unlimited text messaging

4.5 GB data per month (*no rollover*)

Net cost to Lifeline customer: **\$0**

**Service includes:**

- Free calls to STANDUP Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra charge
- Additional data available for purchase