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July 29, 2016

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JUL 29 2016

PUBLIC SERVICE  
COMMISSION

***Via Hand-Delivery***

Ms. Talia R. Matthews, Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

RE: *Petition of IM Telecom, LLC D/B/A Infiniti Mobile For Designation as  
an Eligible Telecommunications Carrier in the Commonwealth of  
Kentucky*

Dear Ms. Matthews:

Please find enclosed for filing an original and ten (10) copies of IM Telecom, LLC D/B/A Infiniti Mobile 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

RECEIVED

JUL 29 2016

PUBLIC SERVICE  
COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

\_\_\_\_\_  
IN THE MATTER OF: )  
)  
)

PETITION OF IM TELECOM, LLC D/B/A )  
INFINITI MOBILE FOR DESIGNATION AS )  
AN ELIGIBLE TELECOMMUNICATIONS )  
CARRIER IN THE COMMONWEALTH OF )  
KENTUCKY )  
\_\_\_\_\_ )

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

**PETITION OF IM TELECOM, LLC D/B/A INFINITI MOBILE  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF KENTUCKY**

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July 28, 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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INFINTI MOBILE FOR DESIGNATION AS )  
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Case No. \_\_\_\_\_

**PETITION OF IM TELECOM, LLC D/B/A INFINTI MOBILE  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF KENTUCKY**

**I. INTRODUCTION**

IM Telecom, LLC d/b/a Infiniti Mobile (“Infiniti Mobile” 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. Infiniti Mobile seeks ETC designation solely to provide Lifeline service to qualifying Kentucky consumers; the Company will not seek access to funds from the federal or state Universal Service Funds (“USF”) for the purpose of providing service to high-cost areas.<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> Infiniti Mobile will seek reimbursement from the federal USF and the Kentucky USF. Given that Infiniti Mobile 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.

As demonstrated herein, and as certified in Exhibit 1 to this Petition, Infiniti Mobile meets all the statutory and regulatory requirements for designation as an ETC in the Commonwealth of Kentucky, including the new 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 Infiniti Mobile's request, moreover, would advance the public interest because designating the Company as an ETC would enable 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:

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<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**

Infiniti Mobile is an Oklahoma Limited Liability Company.<sup>6</sup> The Company's principal office is located at 1705 South Baltimore Ave., Tulsa, Oklahoma 74119. Infiniti Mobile 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 10, 2015. Infiniti Mobile provides prepaid wireless telecommunications services to consumers by using the Sprint Spectrum L.P. ("Sprint"), Verizon Wireless ("Verizon"), and T-Mobile USA, Inc. ("T-Mobile") networks on a wholesale basis. Infiniti Mobile obtains from Sprint, Verizon, and T-Mobile the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator ("MVNO"). Infiniti Mobile has been designated as an ETC in Oklahoma; and the Company currently has applications for ETC designation pending before the FCC for the states of Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee, Texas, as well as the District of Columbia and the Commonwealth of Virginia; before the Georgia Public Service Commission, for designation in Georgia; before the Vermont Public Service Board, for designation in Vermont; before the Kansas Corporation Commission, for designation in Kansas; before the Wisconsin Public Utility Commission, for designation in Wisconsin; before the California Public Utilities Commission, for designation in California; before the South Dakota Public Utilities Commission, for designation in South Dakota; before the State of Nevada Public Utilities Commission, for designation in Nevada; before the Arizona Corporation Commission, for designation in the State of Arizona; before the Maryland Public Service Commission, for designation in the State of Maryland; and before the

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<sup>6</sup> Infiniti Mobile was organized in the State of Oklahoma on February 9, 2012.



Pennsylvania Public Utility Commission, for designation in the State of Pennsylvania. No such petitions have been denied.

Infiniti Mobile's prepaid wireless services are affordable, easy-to-use, and attractive to low-income and lower-volume consumers. The Company's wireless service provides them 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. Infiniti Mobile offers consumers a variety of simple and affordable service plans, easy-to-use handsets, and high-quality customer service. Given the Company's pricing and marketing strategy and the demographics of other, similar MVNOs' customers, Infiniti Mobile anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. Infiniti Mobile neither conducts credit checks nor requires customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

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

**B. Proposed Universal Service Offering**

Infiniti Mobile 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. Infiniti Mobile intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice usage at affordable price points.

The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other Infiniti Mobile prepaid customers, with one notable exception: prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, Infiniti Mobile will receive support from the Lifeline program as compensation for providing those services. Attached hereto as Exhibit 2 is a summary table of the Company's proposed Lifeline offering.<sup>7</sup> In addition to wholly supported voice services, prepaid Lifeline customers will also receive a free handset as well as voice mail, caller I.D., 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 are always free, regardless of service activation or availability of minutes. As Exhibit 2 demonstrates, the Company's Lifeline offerings will allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, and without the burden of credit checks or service contracts. Infiniti Mobile's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are nonetheless concerned about usage charges or long-term contracts.

Low-income consumers will further benefit from Infiniti Mobile's service because of the Company's unique platform that will allow customers to refill minutes at authorized local stores in neighborhoods where many low-income customers reside. Infiniti Mobile has existing relationships with neighborhood retailers across the United States, as well as using traditional brick-and-mortar stores. This innovative distribution model is more practical and convenient for existing, and potential, Lifeline customers than are other mechanisms, because such model allows customers to obtain additional minutes without the expense and trouble of traveling to retail

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<sup>7</sup>The Company's Lifeline terms and conditions can be found online, at <http://infinitimobile.com>. The Company's retail terms and conditions, for all non-Lifeline retail plans can be found online, at <http://infinitimobile.com>.

locations outside their neighborhoods or having access to a computer to go online. Infiniti Mobile's distribution arrangement will therefore advance Governor Bevin's and the Commission's goals of increasing awareness of and participation in the Kentucky Lifeline program.

### **C. Plan Enrollment**

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website (<http://infinitimobile.com>), which will contain information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. Customers may then request that an enrollment form be mailed to them, or they can download a form from the Internet or retrieve a form in person at authorized retail locations. The certification forms, a sample of which is currently used in Oklahoma is attached as Exhibit A of Exhibit 3, the Company's FCC-Approved Compliance Plan, 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.

Infiniti Mobile's certification form will also require all consumers, at sign-up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by

revised 47 C.F.R. § 54.410(d).<sup>8</sup> See Exhibit 3 for more detailed enrollment information. Infiniti Mobile will annually re-certify the continued eligibility of all of its subscribers.

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

Infiniti Mobile 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. Infiniti Mobile will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.<sup>9</sup> Infiniti Mobile will notify its subscribers at service initiation about the non-transferability of the phone service, its usage requirements, and the de-enrollment as well as deactivation that will result following non-usage in any 60-day period of time.<sup>10</sup> An account will be considered active if, during any 60-day period, the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; initiates an outbound SMS or data usage; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.<sup>11</sup> Infiniti Mobile 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 who have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility for Lifeline service.

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<sup>8</sup> See *Lifeline and Link Up Reform Order* at p. 227–29.

<sup>9</sup> See *id.* at ¶ 257.

<sup>10</sup> See *id.*

<sup>11</sup> See *id.* at ¶ 261.

To further protect the integrity of the USF, Infiniti Mobile has contracted with CGM, LLC (“CGM”), of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate the Company’s subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM’s systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, Infiniti Mobile ensures that it does not over-request from 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>12</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>13</sup> Therefore, the Commission has the authority to designate Infiniti Mobile 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). Infiniti Mobile recognizes that Section 214(e)(1)(A) of the Act provides 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>12</sup> 47 U.S.C. § 214(e)(2).

<sup>13</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 granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.<sup>14</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 under Section 10(e) to act in accordance with the FCC's grant of forbearance, and therefore, may not apply the facilities-based requirement to Infiniti Mobile. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant Infiniti Mobile's request for designation as an ETC throughout the Commonwealth of Kentucky.

### **III. INFINITI MOBILE 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>15</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 offering all of the services supported by universal service, either through the use of their own facilities or through 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

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<sup>14</sup> See *Lifeline and Link Up Reform Order* at ¶ 368.

<sup>15</sup> See *USF Order*, 8858–59, ¶ 145.

advertise the availability and rates of such services.<sup>16</sup> As detailed below, Infiniti Mobile satisfies each of the above-listed requirements.

**A. Infiniti Mobile 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 Infiniti Mobile. 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>17</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.

Infiniti Mobile will avail itself of the FCC’s grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, Infiniti Mobile’s Compliance Plan was approved by the FCC on August 8, 2012. A copy of the Company’s FCC-Approved Compliance Plan is attached hereto as Exhibit 3. Infiniti Mobile commits to providing Lifeline service in Kentucky in accordance with the Compliance Plan.

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<sup>16</sup> See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

<sup>17</sup> See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

## **B. Infiniti Mobile Is a Common Carrier**

CMRS providers like Infiniti Mobile are treated as common carriers.<sup>18</sup>

## **C. Infiniti Mobile Will Provide All Required Services and Functionalities**

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

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

Infiniti Mobile provides voice-grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Sprint, Verizon, and 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>19</sup> Infiniti Mobile offers rate plans that provide its customers with minutes of use for local service at no additional charge.

### **3. Access to Emergency Services**

Infiniti Mobile 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. Infiniti Mobile also complies with the FCC's regulations governing the deployment and availability of E911

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<sup>18</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 PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, . . . all mobile telephone services and resellers of such services.").

<sup>19</sup> *See e.g., In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision, 15 FCC Rcd 7331 (2002).



compatible handsets.

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

In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.<sup>20</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>21</sup> Nonetheless, Infiniti Mobile’s offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. Infiniti Mobile’s service, moreover, is not offered on a distance-sensitive basis, and local and domestic, long-distance minutes are treated the same. Infiniti Mobile will not seek reimbursement for toll-limitation service.

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

While no longer required by 47 C.F.R. § 54.101(a), Infiniti Mobile 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. Infiniti Mobile Will Advertise the Availability of Supported Services**

Infiniti Mobile will broadly 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

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<sup>20</sup> See *Lifeline and Link Up Reform Order* at ¶ 367.

<sup>21</sup> See *id.* at ¶ 49.

set forth in the *Lifeline and Link Up Reform Order*.<sup>22</sup> The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using many media for outreach that may include, but are not limited to, telephone marketing, direct mailing, and face-to-face events. 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. Infiniti Mobile may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and the Company may partner with non-profit assistance organizations in order to inform customers of the availability of its Lifeline service.

In addition, Infiniti Mobile intends to establish and utilize a network of retail locations as well as its Company website (<http://infinitimobile.com>) to help promote the availability of its Lifeline plans, especially those retail locations in areas that are frequented by low-income consumers. Infiniti Mobile will provide any retail vendors with whom the Company partners with signage to be displayed wherever Company products are sold, and the Company will provide such vendors with printed materials describing the Company's Lifeline program.<sup>23</sup>

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

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<sup>22</sup> See *Lifeline and Link Up Reform Order* at Section VII.F.

<sup>23</sup> See attached Exhibit B of Exhibit 3, the Company's FCC-Approved Compliance Plan, for sample advertisements.

make clear that consumers 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.<sup>24</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, Infiniti Mobile will include the URL link for its website (<http://infinitimobile.com>) where disclosures will be listed. Additionally, Infiniti Mobile will disclose the Company name under which it does business (“Care Wireless”) and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.<sup>25</sup>

As former Governor Beshear and the Commission emphasized when proclaiming September 13-19, 2010 as “Lifeline Awareness Week,” statistics suggest there are many eligible customers who are not yet aware of the programs.<sup>26</sup> As of December 31, 2011, only between 10% and 20% of consumers eligible for Lifeline Services in Kentucky were being provided such services.<sup>27</sup> Infiniti Mobile believes that its advertising and outreach efforts, as detailed above, will result in increased participation in the Lifeline program.

**E. Infiniti Mobile Requests Designation Throughout Its Service Area in Kentucky**

Infiniti Mobile 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. Infiniti Mobile requests ETC designation in the non-rural exchanges of BellSouth Telecommunications, Inc. dba AT&T-Kentucky, Cincinnati

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<sup>24</sup> See *Lifeline and Link Up Reform Order* at ¶ 275.

<sup>25</sup> See *id.*

<sup>26</sup> See [http://psc.ky.gov/agencies/psc/press/092010/0914\\_r02.PDF](http://psc.ky.gov/agencies/psc/press/092010/0914_r02.PDF).

<sup>27</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.

Bell Telephone Company, and Windstream Kentucky East, subject to the coverage of its underlying carriers, Sprint, Verizon, and T-Mobile.<sup>28</sup>

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

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

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

As set forth in the *Lifeline and Link Up Reform Order*, a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement 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), Infiniti Mobile, through its underlying carriers, has the ability to remain functional in emergency situations. Through its arrangements with Sprint, Verizon, and T-Mobile, Infiniti Mobile provides to its customers the same ability to remain functional in emergency situations as currently provided by Sprint, Verizon, and T-Mobile to their own customers, including access to a reasonable amount of back-up power, to ensure functionality without an external power source; the ability to reroute traffic around damaged facilities; and the capability of managing traffic spikes resulting from emergency

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<sup>28</sup> A list of wire centers in which the Company requests ETC designation is attached hereto as Exhibit 5.

<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.

situations.

**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, Infiniti Mobile 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 offering be comparable to the underlying ILEC plans, but it also will exceed them in several respects. Infiniti Mobile will offer customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, Infiniti Mobile customers can use these free minutes to place calls statewide (and even nationwide) because Infiniti Mobile does not constrict customers' use by imposing a local calling area requirement. Further, Infiniti Mobile will also provide Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call-waiting services at no cost. The very nature of the wireless phone—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. Infiniti Mobile is Financially and Technically Capable**

Infiniti Mobile is financially and technically capable of providing Lifeline-supported services.<sup>34</sup> Infiniti Mobile has been in business since 2012 and currently provides service to both Lifeline and non-Lifeline customers. Infiniti Mobile already successfully provides wireless services in the State of Oklahoma. Infiniti Mobile has not been subject to enforcement action or ETC revocation proceedings in any state. Infiniti Mobile 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 Infiniti Mobile's efforts is that the Company is a profitable and liquid company, fully capable of honoring all of its service obligations to customers and regulatory obligations to state and federal regulators. Furthermore, the senior management of Infiniti Mobile has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.<sup>35</sup> Infiniti Mobile will be providing resold wireless service, and therefore the Company will also rely upon the managerial and technical expertise of its underlying carriers, Sprint, Verizon, and T-Mobile.

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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 attached Exhibit 6 for key management bios.

**M. Infiniti Mobile 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. Infiniti Mobile 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. Infiniti Mobile Will Comply With All Regulations Imposed By The Commission**

By this Petition, Infiniti Mobile 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, Infiniti Mobile is prepared to answer questions or present additional testimony and other evidence about the Company's 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. Infiniti Mobile'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 INFINTI MOBILE AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is "to secure lower prices and higher quality services for American telecommunications

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

consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.<sup>37</sup> There is no question that designation of Infiniti Mobile as an ETC in Kentucky will further the public interest by providing Kentucky consumers, especially low-income consumers, with lower prices and higher-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, designating Infiniti Mobile as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the Commonwealth of Kentucky—the intended beneficiaries of universal service.

The public interest benefits of the Company’s wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 911 service, and—where available—E911 service in accordance with current FCC requirements. The Company’s Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. Infiniti Mobile’s Lifeline rate plans will allow

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



feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber and without the burden of credit checks or contracts.

Infiniti Mobile's Lifeline program will provide low-income Kentucky residents with the convenience and security offered by wireless services—even if their financial position deteriorates. Current economic circumstances indicate that low-income individuals today 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 free wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

Moreover, 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. Granting Infiniti Mobile the authority necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of Infiniti Mobile's Petition will serve the public interest by increasing the number of ETCs serving the consumer public in Kentucky. By granting ETC status to Infiniti Mobile, the Commission will enable Infiniti Mobile 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 Infiniti Mobile to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, Infiniti Mobile would provide “increased consumer choice,

high-quality service offerings, and mobility,”<sup>38</sup> as well as the safety and security of effective 911 and E911 services.<sup>39</sup>

#### **A. 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>40</sup> First, designation of Infiniti Mobile 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, ultimately resulting in improved services to consumers. Second, designation of Infiniti Mobile as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.<sup>41</sup> Third, introducing Infiniti Mobile into the market as an additional wireless ETC provider will afford low-income Kentucky residents with 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.

#### **B. Impact on the Universal Service Fund**

With Lifeline, ETCs only receive support for customers such companies obtain. The amount of support available to an eligible subscriber is exactly the same, whether the support is given through a company such as Infiniti Mobile or given through the Incumbent LEC operating in the same service area. Infiniti Mobile will only increase the amount of USF Lifeline

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

<sup>39</sup> See *id.* at 3391 ¶ 23.

<sup>40</sup> See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

<sup>41</sup> See 47 U.S.C. § 254(b)(1).

funding in situations where the Company 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*, Infiniti Mobile 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. Indeed, Infiniti Mobile'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>42</sup>

## **V. ANTI-DRUG ABUSE CERTIFICATION**

Infiniti Mobile 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.

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<sup>42</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.

**VI. CONCLUSION**

Based on the foregoing, designation of Infiniti Mobile 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, Infiniti Mobile respectfully requests that the Commission promptly designate Infiniti Mobile as an ETC in the Commonwealth of Kentucky.

Respectfully submitted this 29 day of July, 2016.

By: 

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*Attorneys for IM Telecom, LLC d/b/a Infiniti Mobile*

**EXHIBIT 1**

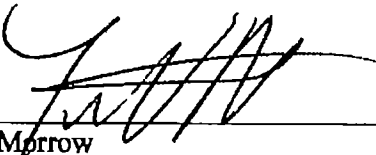
**Certification of Trevan Morrow, COO of IM Telecom, LLC Ininiti Mobile**

State of Oklahoma )  
 )  
County of Tulsa )

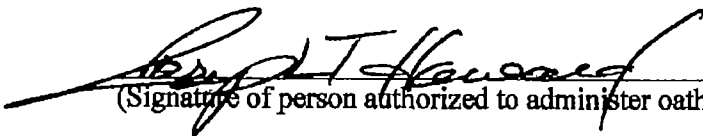
**Certification**

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Trevan Morrow, who first being duly sworn, deposes and states that he is the Chief Operating Officer of IM Telecom, LLC d/b/a Infiniti Mobile, Petitioner in this Petition, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of her knowledge and belief.

Dated: 1-26-16

  
\_\_\_\_\_  
Trevan Morrow  
Chief Operating Officer  
IM Telecom, LLC d/b/a Infiniti Mobile

Subscribed and sworn to before me this 26 day of Jan, 2016.

(Notary Seal)   
(Signature of person authorized to administer oath)

My Commission Expires: \_\_\_\_\_

**JOSEPH T. HOWARD**  
Notary Public - State of Oklahoma  
Tulsa County  
Commission # 14005559  
My Commission Expires June 20, 2018

## EXHIBIT 2

### Proposed Lifeline Offering

Plan	Minutes	Text	Data (MB)	Retail Price	Federal Lifeline Discount	State Lifeline Discount	Net Cost to Lifeline Customer
<b>Kentucky Lifeline 250 Plan*</b>	250 minutes	250 text messages	0 GB	\$12.75	- \$9.25	- \$3.50	<b>\$0.00</b>

\*Must be Eligible. Each month eligible Lifeline subscribers will receive 250 voice minutes and 250 text messages (totaling 500 units) for \$0.00 per month plus fees and taxes. There are no rollover minutes with this plan. Unused minutes will expire each month on the service expiration date. This plan is only available to eligible Kentucky Lifeline subscribers.

#### **All Plans include the following:**

- Free phone
- Free calls to 911 emergency services
- Free calls to Customer Service
- Free access to Voicemail, Caller-ID, Call-Waiting, Call-Forwarding, and 3-Way Calling features
- Free Domestic, Long-Distance Calls

#### **Additional Airtime:**

- \$5.00 for 100 minutes or 100 text messages
- \$5.00 for 100 MB of data

**\*\* In addition to the Kentucky Lifeline 250 Plan, all Lifeline-eligible customers will be able to apply the maximum federal and state Lifeline discount to any retail plans the Company should make available to non-Lifeline consumers. Such plans are subject to change and will be viewable on the Company's website, <http://infinitemobile.com>.**

**EXHIBIT 3**

**FCC-Approved Compliance Plan**



**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

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July 5, 2012

**VIA ECFS**

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

Re: IM Telecom, LLC d/b/a Infiniti Mobile Revised Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On April 16, 2012, IM Telecom, LLC d/b/a Infiniti Mobile ("IM Telecom") submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>1</sup> On June 7, 2012 and June 18, 2012, IM Telecom submitted a revised Compliance Plan to provide additional details.

IM Telecom has further revised its Compliance Plan to: 1) confirm in footnote 3 that IM Telecom will follow the requirements of its Compliance Plan in all states where it provides Lifeline service and receives reimbursements from the federal Low-Income Fund, including in any state where the public utilities commission determines that IM Telecom provides service using its own facilities for purposes of a state universal service program; 2) note in Section I.B. that IM Telecom personnel will fill in, where available, the last four digits of an account or other identifying number on applicants' proof of eligibility document, the date of the proof document and the expiration of the proof document; 3) revise its Lifeline application/certification forms included in Exhibit A to collect such information on the proof of eligibility document; 4) provide in Exhibit B an income eligibility worksheet that will be used

<sup>1</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary

July 5, 2012

Page Two

with applicants that apply for Lifeline service based on income; and 5) discuss further efforts that IM Telecom will undertake to prevent duplicate enrollments by participating in a pooled external duplicates database (Section I.F.).

IM Telecom hereby re-submits its complete Compliance Plan with the above revisions. Based on the minor nature of these changes, IM Telecom reiterates its request for expeditious approval of its Compliance Plan. This letter and revised Compliance Plan is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John J. Heitmann".

John J. Heitmann

Joshua T. Guyan

*Counsel to IM Telecom, LLC d/b/a Infiniti  
Mobile*

cc: Kim Scardino  
Divya Shenoy  
Garnet Hanly

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

In the Matter of IM Telecom, LLC d/b/a Infiniti Mobile	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42

**IM TELECOM, LLC d/b/a INFINITI MOBILE  
COMPLIANCE PLAN**

IM Telecom, LLC d/b/a Infiniti Mobile (“IM Telecom” or the “Company”),<sup>1</sup> through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>2</sup>

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

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<sup>1</sup> The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: Infiniti Mobile (dba), HJS Inc. (affiliate), MWW LLC (affiliate), WWUSA LLC (affiliate).

<sup>2</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

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

IM Telecom will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.<sup>4</sup> This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Company will

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<sup>3</sup> See *Lifeline Reform Order*, ¶ 368. Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. IM Telecom 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, including in any state where the public utilities commission determines that IM Telecom provides service using its own facilities for purposes of a state universal service program.

<sup>4</sup> In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. See Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. See Public Notice, DA 12-828.

offer Lifeline services, the geographic areas in which it will offer services, and a detailed description of the Company's Lifeline service plan offerings.

#### **ACCESS TO 911 AND E911 SERVICES**<sup>5</sup>

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.<sup>6</sup> The Company will comply with these conditions when it begins providing service.

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

IM Telecom's will provide access to 911 and E911 services for all customers. The Company will use Verizon Wireless and Sprint as its underlying network providers/carriers.<sup>7</sup> Verizon Wireless and Sprint route 911 calls from the Company's customers in the same manner as 911 calls from Verizon Wireless's and Sprint's own

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<sup>5</sup> See Compliance Plan Public Notice at 3.

<sup>6</sup> See *Lifeline Reform Order*, ¶ 373.

<sup>7</sup> IM Telecom will receive minutes from its affiliate WWUSA, LLC, which purchases minutes from Ready Mobile, which, in turn, purchases minutes from Verizon Wireless and Sprint.

retail customers. To the extent that Verizon Wireless and Sprint are certified in a given PSAP territory, this 911 capability will function the same for the Company. IM Telecom also will enable 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company will transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

**E911-Compliant Handsets.** IM Telecom will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. The Company will use phones from Verizon Wireless and Sprint that have been through a stringent certification process with Verizon Wireless and Sprint, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

## COMPLIANCE PLAN

### **I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE<sup>8</sup>**

#### **A. Policy**

IM Telecom will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

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<sup>8</sup> See Compliance Plan Public Notice at 3.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

**B. Eligibility Determination**

Although IM Telecom is not yet providing Lifeline service, the Company expects that the vast majority of its Lifeline customer enrollment will be done in-person, as opposed to over the phone or the Internet. IM Telecom will enroll customers at existing retail store locations owned by its affiliate MWW, LLC and at mobile outreach units, which will arrive in particular towns on a set schedule each month to enroll customers, provide live customer service support to existing subscribers and allow subscribers to make payments.

IM Telecom will use laptops and tablets to complete enrollment in real-time. The electronic order process will provide the Company the opportunity to perform several database checks in real-time during the enrollment process. Only IM Telecom employees will enroll customers in its Lifeline service – the Company will not use agents or representatives for Lifeline enrollment. IM Telecom employees must log in to the software so that the customer enrollment is automatically tagged to a particular employee. The employee must sign his or her agreement not to take part in any fraud with respect to Lifeline enrollment. The employee will then advance through the

electronic windows with the prospective customer to provide disclosures, collect information and elicit certifications as detailed below. The first question that will be asked of the potential Lifeline customer is whether the customer or anyone in the customer's household is currently receiving a Lifeline benefit from any other Lifeline service provider. Employees in Oklahoma will be required to ask the potential customer whether anyone in the customer's household receives Lifeline service from YourTel, TerraCom, Assist Wireless or True Wireless. To complete the electronic enrollment, the customer signs the electronic application and the information collected is sent for several database checks, including an address verification, a geographic footprint match to the ETC's authorization to provide Lifeline service in the area, an internal duplicate check and a state database eligibility check (if available).

The electronic enrollment process includes the ability to scan customers' government-issued identification, proof of residence (if necessary because the address cannot be verified) and proof of eligibility. The proof will only be retained for a short period of time for verification and then deleted. All transfers of information and scans collected electronically are transmitted in encrypted form. When the checks described herein are completed in real-time, approved customers are enrolled and receive a handset to be activated as discussed below.

As discussed in further detail in Section I.F. below, all employees that conduct such in-person enrollments will be trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New employees will undergo an initial mandatory training session where they are given



training materials, including a compliance manual, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If IM Telecom cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, employees will review documentation establishing eligibility pursuant to the Lifeline rules.<sup>9</sup> All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

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

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<sup>9</sup> See *Lifeline Reform Order*, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

<sup>10</sup> See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

<sup>11</sup> *Id.* and section 54.410(c)(1)(i)(B).

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.<sup>12</sup>

Employees will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.<sup>13</sup> In addition, employees will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. IM Telecom will not retain a copy of this documentation, unless required by a state.<sup>14</sup> Where the employee concludes that proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection. In the event that an employee cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at IM Telecom's corporate headquarters in Tulsa, Oklahoma.

De-Enrollment for Ineligibility. If IM Telecom has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company

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

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

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

will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>15</sup> A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

### **C. Subscriber Certifications for Enrollment**

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to IM Telecom employees as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.<sup>16</sup> The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.<sup>17</sup> Applicants that seek to enroll based on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.<sup>18</sup> Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission, including

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<sup>15</sup> See *Lifeline Reform Order*, ¶ 143; section 54.405(e)(1).

<sup>16</sup> *Lifeline Reform Order*, ¶ 61; section 54.410(a).

<sup>17</sup> See Model Application/Certification Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

<sup>18</sup> See Income Eligibility Worksheet, included as Exhibit B.

the required proof of eligibility. Any evidentiary documentation submitted with the application/certification is used strictly to verify a consumer's eligibility to participate in the Lifeline program. Upon approval of the customer's application, such proof of eligibility is either returned to the customer or destroyed and is not retained by IM Telecom, as previously stated in Section I.B. above. In addition, employees will verbally explain the certifications to consumers when they are enrolling in person or over the phone.<sup>19</sup>

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.<sup>20</sup>

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.<sup>21</sup>

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<sup>19</sup> See *Lifeline Reform Order*, ¶ 123.

<sup>20</sup> See *Lifeline Reform Order*, ¶ 121; section 54.410(d)(1).

<sup>21</sup> See section 54.405(c).

In addition, the Company will notify the applicant that the Lifeline service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.<sup>22</sup>

Information Collection. IM Telecom also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient<sup>23</sup>); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>24</sup>

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,<sup>25</sup> the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or

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<sup>22</sup> See *Lifeline Reform Order*, ¶ 257.

<sup>23</sup> See *Lifeline Reform Order*, ¶ 87.

<sup>24</sup> See section 54.410(d)(2).

<sup>25</sup> See *Lifeline Reform Order*, ¶¶ 168-69; section 54.419.

she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize IM Telecom to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the Company to release any records required for the administration of

the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.<sup>26</sup>

#### **D. Annual Verification Procedures**

IM Telecom will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>27</sup> Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.<sup>28</sup>

2012 Verification. The Company will re-certify the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.<sup>29</sup> The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to

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<sup>26</sup> See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.*

<sup>27</sup> See *Lifeline Reform Order*, ¶ 120.

<sup>28</sup> See *Lifeline Reform Order*, ¶ 145.

<sup>29</sup> See *id.*, ¶ 130.

retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact IM Telecom in response to the re-certification requirement.

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

#### **E. Activation and Non-Usage**

IM Telecom will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's Lifeline service.<sup>31</sup> A customer that activates the Company's Lifeline service will affirmatively acknowledge that they are the applicant and that they have applied for, and wish to receive, Lifeline service from IM Telecom. Customers that apply for Lifeline service and receive phones in person will activate the phone and place a test call with the Company representative. Customers that receive a handset through the mail must contact IM Telecom's Welcome Activation Customer Service Center to activate service upon receipt of the handset. New activations are routed to a dedicated activation hotline where a trained Customer Support Agent validates the information contained in the customer's application, receives affirmative acknowledgment that the individual activating the

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<sup>30</sup> See *id.*, ¶ 142; section 54.54.405(e)(4).

<sup>31</sup> See *Lifeline Reform Order*, ¶ 257; section 54.407(c)(1).



handset is the application and that they have applied for an wish to receive Lifeline service from IM Telecom. The Customer Support Agent then activates the Lifeline service.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.<sup>32</sup> Subscribers can “use” the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber’s plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.<sup>33</sup>

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and IM Telecom will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>34</sup>

**F. Additional Measures to Prevent Waste, Fraud and Abuse**

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company will implement measures and procedures to prevent duplicate Lifeline benefits

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<sup>32</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

<sup>33</sup> See *Lifeline Reform Order*, ¶ 261; section 54.407(c)(2).

<sup>34</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the database when it becomes available, employees will emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All employees interacting with existing and potential Lifeline customers will undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. All employees receive such training upon being hired. This includes reviewing and signing the Company’s training manual and a training session. IM Telecom conducts an employee meeting once each month to refresh training and seek feedback from employees regarding enrollment. In addition, if employees have any questions regarding eligibility and enrollment, they can access an intranet site to see their management team and get contact information for questions.

Further, all employees must log in to the Company’s network to enroll customers and therefore can be tracked. The Company employs two forensic accountants that monitor accounts for irregularities, such as excessive activity. They also conduct random audits of activations whereby the forensic accountants contact customers to verify enrollment and ask questions relating to customer service.

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, IM Telecom 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.<sup>35</sup>

One-Per-Household. IM Telecom will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household<sup>36</sup> through the use of its application and certification forms discussed above, database checks and its marketing materials discussed below. Upon receiving an application for IM Telecom's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.<sup>37</sup> If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's

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<sup>35</sup> See *Lifeline Reform Order*, ¶ 203. The Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, the Company will update each subscriber's information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See section 54.404(b)(8),(10).

<sup>36</sup> A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; section 54.400(h).

<sup>37</sup> See *Lifeline Reform Order*, ¶ 78.

household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).<sup>38</sup> Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.<sup>39</sup>

In addition, IM Telecom employees will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. Employees will be instructed ask potential customers whether the customer or any other member of the customer's household is currently receiving a Lifeline-supported service. Employees enrolling Oklahoma customers will ask whether the customer is currently receiving Lifeline-supported service from YourTel, Terracom, Assist Wireless or True Wireless. Finally, at the time of enrollment, IM Telecom will check each applicant against a pooled duplicates database established by CGM, LLC.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, IM Telecom will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible

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<sup>38</sup> *Id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

<sup>39</sup> See *Lifeline Reform Order*, ¶ 89.

consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; (7) IM Telecom, LLC d/b/a Infiniti Mobile's name (the ETC); and (8) the Company's application/certification form will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.<sup>40</sup> These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.<sup>41</sup> This specifically includes the Company's website (<http://MyInfinitiMobile.com>) and outdoor signage.<sup>42</sup> A sample of the Company's marketing materials is included as Exhibit C. Finally, IM Telecom has stated in its marketing sample that customers are not eligible for a second Lifeline benefit if they already have Lifeline service from True Wireless, Assist Wireless, Terracom, YourTel or any other Lifeline landline or wireless provider.

#### **G. Company Reimbursements From the Fund**

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, IM Telecom will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the

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<sup>40</sup> See *Lifeline Reform Order*, ¶ 275; section 54.405(c).

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

subscribers for whom it is seeking reimbursement.<sup>43</sup> Further, the Company will submit its FCC Forms 497 on the eighth day of each month in order to be reimbursed the same month.<sup>44</sup> In addition, the Company will keep accurate records as directed by USAC<sup>45</sup> and as required by new section 54.417 of the Commission's rules.

#### **H. Annual Company Certifications**

IM Telecom will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;<sup>46</sup> (2) is in compliance with all federal Lifeline certification procedures;<sup>47</sup> and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.<sup>48</sup>

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).<sup>49</sup> Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>50</sup>

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<sup>43</sup> See *Lifeline Reform Order*, ¶ 128; section 54.407(d).

<sup>44</sup> See *Lifeline Reform Order*, ¶¶ 302-306.

<sup>45</sup> See section 54.407(e).

<sup>46</sup> See *Lifeline Reform Order*, ¶ 126; section 54.416(a)(1).

<sup>47</sup> See *Lifeline Reform Order*, ¶ 127; section 54.416(a)(2).

<sup>48</sup> See section 54.416(a)(3).

<sup>49</sup> See *Lifeline Reform Order*, ¶¶ 132,148; section 54.416(b).

<sup>50</sup> See *Lifeline Reform Order*, ¶ 257; section 54.405(e)(3).

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,<sup>51</sup> the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.<sup>52</sup> The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>53</sup> Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that the Company is able to function in emergency situations.<sup>54</sup>

#### **I. Cooperation with State and Federal Regulators**

IM Telecom has not yet provided Lifeline service, but it will cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of

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<sup>51</sup> See section 54.422(c).

<sup>52</sup> See *Lifeline Reform Order*, ¶¶ 296, 390; section 54.422(a).

<sup>53</sup> See *Lifeline Reform Order*, ¶ 390; section 54.422(b)(5).

<sup>54</sup> See *Lifeline Reform Order*, ¶ 389; section 54.422(b)(1)-(4).

determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;<sup>55</sup>

- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe<sup>56</sup> is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

## **II. Description of Lifeline Service Offerings<sup>57</sup>**

IM Telecom will offer its Lifeline service in the states where it is designated as an ETC<sup>58</sup> and throughout the coverage area of its underlying providers Verizon Wireless and Sprint.<sup>59</sup> The Company's Lifeline offerings in Oklahoma will be: (1) the Oklahoma 1000 Plan, which includes 1,000 anytime minutes or text messages per month for \$1.00,<sup>60</sup> with no rollover; or (2) the Oklahoma Unlimited Plan, which includes unlimited minutes for \$6.20<sup>61</sup> with no text messaging.<sup>62</sup> Text messaging is charged as one minute of talk time

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<sup>55</sup> The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

<sup>56</sup> See section 54.405(e)(1).

<sup>57</sup> See Compliance Plan Public Notice at 3.

<sup>58</sup> The Company has a petition for ETC designation currently pending in Oklahoma.

<sup>59</sup> IM Telecom will receive minutes from its affiliate WWUSA, LLC, which purchases minutes from Ready Mobile, which, in turn, purchases minutes from Verizon Wireless and Sprint.

<sup>60</sup> The price for this plan for non-Lifeline-eligible customers is \$35.25.

<sup>61</sup> The price for this plan for non-Lifeline-eligible customers is \$40.45.



per text message for the Oklahoma 1000 Plan. Lifeline and non-Lifeline customers will be able to purchase additional bundles of minutes in denominations of 100 minutes for \$5.00. Airtime “top-up” minutes will be available for purchase at the Company’s retail locations and on its website. Additional text messages can be purchased at the rate of \$0.05 each. Additional information regarding the Company’s plans, rates and services can be found on its website <http://MyInfinitiMobile.com>.

In addition to free voice services, the Company’s Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and Voicemail. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

IM Telecom is developing bundled packages of voice and broadband service and plans to apply to participate in the broadband pilot program outlined in the *Lifeline Reform Order*.<sup>63</sup>

### **III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation<sup>64</sup>**

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission’s Lifeline service

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<sup>62</sup> There is no rollover for the Oklahoma Unlimited Plan, but that is irrelevant for an unlimited plan.

<sup>63</sup> See *Lifeline Reform Order*, ¶¶ 323-354.

<sup>64</sup> See Compliance Plan Public Notice at 3.

requirements.<sup>65</sup> The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

IM Telecom has not yet begun providing Lifeline or non-Lifeline wireless service. The Company is owned by Trevan Morrow, who also serves as its Chief Operating Officer. Mr. Morrow is an attorney and member of the Cherokee Indian Tribe with strong roots in Oklahoma. Mr. Morrow grew up in Oklahoma, attended Northeastern State University in Tahlequah, Oklahoma and received his Juris Doctor from the University of Oklahoma. Mr. Morrow has a legal practice in Oklahoma and has helped to establish several small companies in the state, including companies in the tech sector. Through those ventures Mr. Morrow met Gregg Iser, who serves as IM Telecom's Chief Executive Officer.

Mr. Iser has lived in Oklahoma since 1993 when he moved to the state to attend Oral Roberts University. Mr. Iser began a marketing company in Oklahoma in 1994 and entered the telecommunications business in 1998, becoming the top dealer in Oklahoma as a Sprint PCS dealer. In 1999, Mr. Iser was a top VoiceStream Wireless dealer, but in 2000 Mr. Iser sold his retail stores and became a wholesaler of wireless phones to dealers and carriers nationwide. Mr. Iser helped smaller carriers like Pioneer Cellular and

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<sup>65</sup> See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Carolina West to re-brand wireless phones to compete against larger carriers. Altogether, Mr. Iser has more than 14 years of wireless industry experience in retail, wholesale, programming and packaging, handset distribution and customer service.

Both Mr. Morrow and Mr. Iser have strong roots in Oklahoma where IM Telecom intends to provide service as an ETC. Further, they have a combination of backgrounds and skill sets that will allow IM Telecom to provide non-Lifeline and Lifeline wireless services to eligible consumers in a manner that meets the needs of low-income consumers, including residents of Tribal lands in Oklahoma, and is compliant with the Commission's requirements.

IM Telecom is affiliated through common ownership by Mr. Morrow with several companies. MWW, LLC is an affiliate that currently operates as an outlet for retail locations enrolling Lifeline customers and activating handsets for ETCs and will operate as retail locations for the new ETC IM Telecom. Once IM Telecom is designated as an ETC, MWW, LLC retail locations will only sign up customers for IM Telecom, both Lifeline and non-Lifeline. MWW, LLC will, at that time, no longer enroll customers for other ETCs. HJS, Inc. is another affiliate, which has been in business since 1998, and it programs and activates handsets, brokers handset sales and packages handsets for wireless carriers. HJS further handles all technical issues regarding handset provisioning of the PRL (Preferred Roaming List) for the Verizon Wireless and Sprint Networks. HJS has and will continue to generate revenue streams for IM Telecom. Finally, another affiliate WWUSA, LLC resells wholesale minutes and airtime from Verizon Wireless and Sprint, through Ready Wireless, to other wireless carriers.

In addition to its access to revenue streams from its affiliates, IM Telecom has also provided handset programming, sale brokering, and packaging to non-Lifeline customers and, consequently, IM Telecom has not and will not be relying exclusively on Lifeline reimbursements for the Company's operating revenues. The Company has other substantial cash reserves from Member Manager Owners. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."<sup>66</sup> The Company certifies that it will comply with the service requirements applicable to the support the Company receives.<sup>67</sup> The Company will provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings will provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's planned Lifeline offerings include packages in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As

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<sup>66</sup> Compliance Plan Public Notice at 3.

<sup>67</sup> 47 C.F.R. § 54.202(a)(1).

discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS"). The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.<sup>68</sup>

#### **IV. Conclusion**

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

Respectfully submitted,



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Suite 400  
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(202) 342-8544

*Counsel to IM Telecom, LLC d/b/a Infiniti  
Mobile*

July 5, 2012

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<sup>68</sup> See *Lifeline Reform Order*, ¶ 230.

# **EXHIBIT A**



IM Telecom LLC d/b/a Infiniti Mobile  
**Oklahoma Wireless Lifeline Service Application and Certification**

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**Mail or fax form completed and signed form to:**  
 1855 East 15<sup>th</sup> Street, Tulsa, Oklahoma 74104  
 Fax 1.918.619.9635 / Customer Service: 1.918.960.0023

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

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

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

**Customer Eligibility Certification:**

**OPTION 1 - ELIGIBILITY BY PROGRAM:**

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

- |   |  |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines     |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR)  |
| <input type="checkbox"/> Medicaid (not Medicare)                            | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA)         |
| <input type="checkbox"/> Supplemental Security Income (SSI)                 | <input type="checkbox"/> Tribally Administered TANF (TATNF)                        |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)     | <input type="checkbox"/> Head Start (meeting income qualifying standards) (Tribal) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch program        |

**OPTION 2 - ELIGIBILITY BY INCOME:**

How many people are in your household? \_\_\_\_\_

# of people	Total Annual Income at:	# of people	Total Annual Income at:	# of people	Total Annual Income at:
1 Person	\$14,702	3 People	\$25,016	5 People	\$35,330
2 People	\$19,859	4 People	\$30,173	Each Additional	\$5,157

To qualify for income eligibility, 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 current calendar year.

- Prior year's state, federal or tribal tax return
- Unemployment/Workers Compensation benefits statement
- Social Security benefits statement
- Current income statement from employer or paycheck stub
- Federal or tribal notice letter of participation in Bureau of Indian Affairs General Assistance
- Retirement/Pension benefit statement
- Divorce decree or child support document
- Veterans Administration benefits statement





**Additional certifications: I hereby certify, under penalty of perjury, that (check each box):**

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

Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

- In order for your Infiniti Mobile Lifeline account to remain active, we require that you use your Infiniti Mobile Lifeline supported wireless service at least once every 60 days.
- You can use the service by completing an outbound call, purchasing minutes from Infiniti Mobile to add to your plan, answering an incoming call from someone other than Infiniti Mobile or responding to a direct contact from Infiniti Mobile confirming that you want to continue receiving the service.

**For Agent Use Only**

(check the appropriate boxes for the proof of eligibility viewed and provide information requested; do not copy or retain documentation):

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

- The prior year's state, federal, or Tribal tax return,
- Current income statement from an employer or paycheck stub,
- A Social Security statement of benefits,
- A Veterans Administration statement of benefits,
- A retirement/pension statement of benefits,
- An Unemployment/Workmen's Compensation statement of benefits, Federal or Tribal notice letter of participation in General Assistance, or
- A divorce decree, child support award, or other official document containing income information for at least three months time.

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

**List A - (Choose 1)**

- Supplemental Nutrition Assistance Program (SNAP)
- Section 8 Federal Public Housing Assistance (FPHA)
- Medicaid (not Medicare)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)
- Head Start (meeting income qualifying standards) (Tribal)
- Tribally Administered TANF (TATNF)
- National School Lunch Program's free lunch program
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)

**List B - (Choose 1)**

- Program participation card/document
- Prior year's statement of benefits
- Notice letter of participation
- Other official document evidencing participation

Last 4 digits of Document from List B: \_\_\_\_\_

Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Expiration Date of Proof Document: \_\_\_\_/\_\_\_\_/\_\_\_\_

Applicant Account Number: \_\_\_\_\_

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

# **EXHIBIT B**



## Lifeline Service Application Income Eligibility Worksheet

Individuals in all states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

**Applicants must list the number of individuals in the applicant's household on the Lifeline application form.** Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- the prior year's state, federal, or Tribal tax return
- current income statement from an employer or paycheck stub
- a Social Security statement of benefits
- a Veterans Administration statement of benefits
- a retirement/pension statement of benefits
- an Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- a divorce decree, child support award, or other official document containing income information for at least three months time

**This is a Lifeline service provided by IM Telecom, LLC dba Infiniti Mobile. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.**

# **EXHIBIT C**



▶ Store Hours:  
Monday- Saturday  
12pm-6pm

▶ FREE ACTIVATION  
NO CREDIT CHECK  
NO CONTRACT  
GOOD FOR 12 MONTHS

▶ [www.MYINFINITIMOBILE.com](http://www.MYINFINITIMOBILE.com)  
918.960.0023

**YOU QUALIFY IN OKLAHOMA FOR LIFELINE GOVERNMENT ASSISTANCE SERVICE IF YOU RECEIVE ANY GOVERNMENT ASSISTANCE\* INCLUDING?**

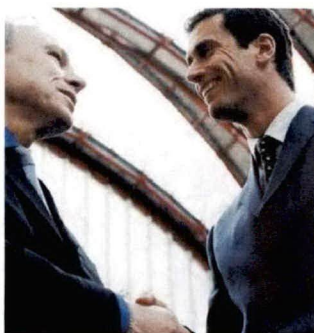
1. Food Stamps/ Supplemental Nutrition Assistance Program (SNAP)
2. Federal Public Housing Assistance / Section 8
3. Medicaid
4. National School Lunch Free Program (residents of Tribal Lands only)
5. Supplemental Security Income (SSI)
6. Low Income Home Energy Assistance Program (LIHEAP)
7. Temporary Assistance for Needy Families (TANF)
8. Vocational Rehabilitation (including hearing impaired)
9. Bureau of Indian Affairs General Assistance
10. Head Start (income qualifying / residents of Tribal Lands only)
11. Tribally Administered TANF
12. OK Sales Relief

\*Only eligible consumers may enroll in the program. Proof of eligibility is required, which may consist of an eligible program card or statement of benefits.



**Lifeline Service Plans Available:**

<p><b>Oklahoma Lifeline 1000 Plan</b> 1000 Minutes or Texts, \$1+taxes</p> <p><b>Oklahoma Lifeline Unlimited</b> Unlimited Minutes, No Text, \$6.20 + taxes</p>
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**ONE LIFELINE SERVICE per household disclosures:**

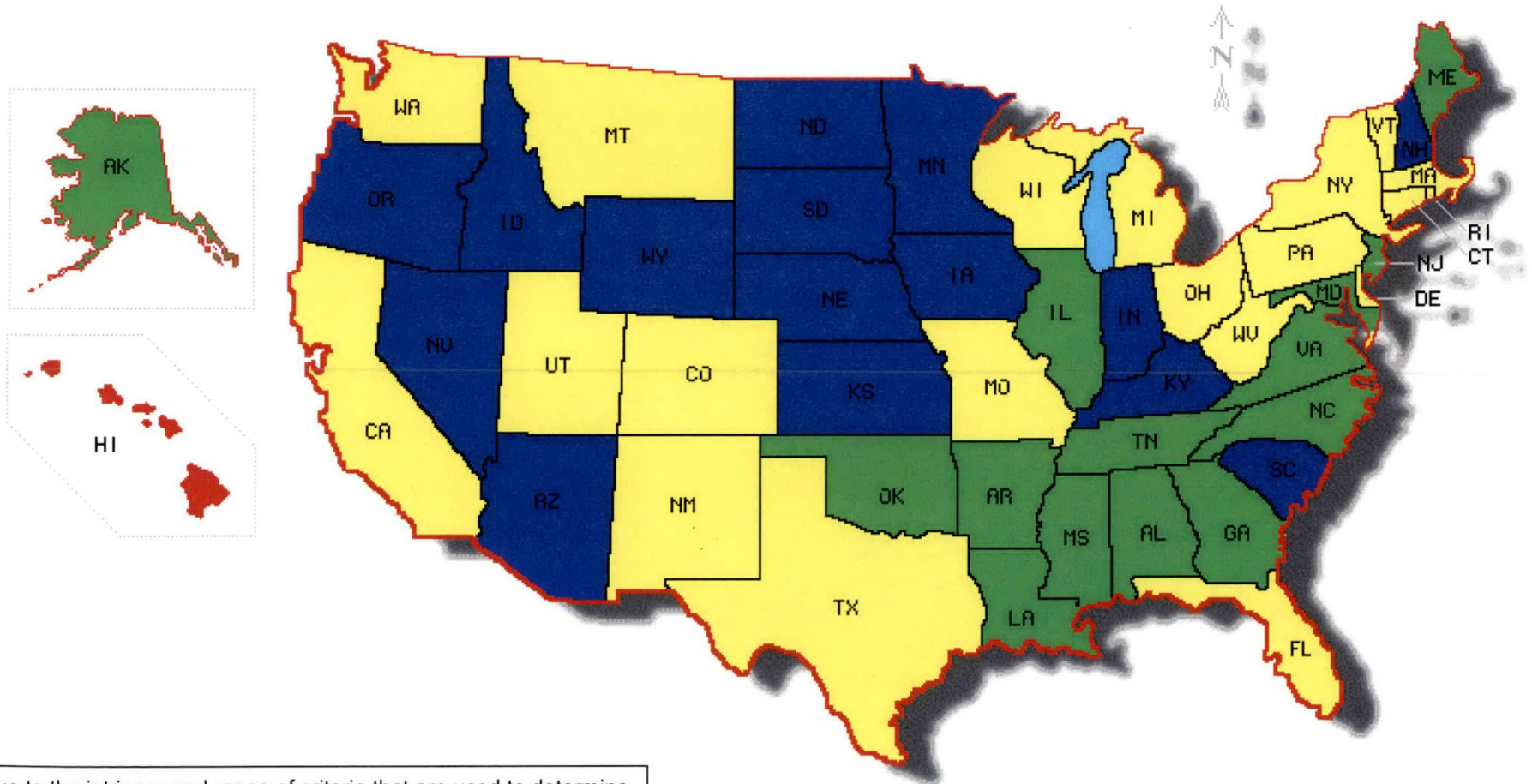
Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. In Oklahoma, if you have Lifeline service with True Wireless, Assist Wireless, TerraCom, YourTel, or any other Lifeline landline or wireless provider, you may not receive a second Lifeline benefit. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. Violation of the one per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and potentially prosecution by the United States Government. Please visit store for full details. IM Telecom LLC. dba Ininiti Mobile is an Eligible Telecommunications Carrier (ETC). 111 West 5th Street, Tulsa, Oklahoma 74103 918 960 0023

**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**

**Wire Centers**



## T-Mobile 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	BOWLNGGREN
BWLGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WOODBURN
BWLGKYRV	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	BOWLNGGREN
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
EMNKNYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMINENCE
EMNKNYPL	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	EMINENCE

## T-Mobile Wire Centers

CLLI CODE	COMPANY NAME	WIRE CENTERS
EMNKKYPL	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
FNVLYKYMA	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
GNVLYKYMA	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

## T-Mobile Wire Centers

CLLI CODE	COMPANY NAME	WIRE CENTERS
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
LSVLKYOA	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

## T-Mobile Wire Centers

CLLI CODE	COMPANY NAME	WIRE CENTERS
PKVLKYMT	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PIKEVILLE
PMBRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PEMBROKE
PNVLYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PAINTSVL
PRBGKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRESTONSBG
PRTNKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PRINCETON
PRVDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PROVIDENCE
PRVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PERRYVILLE
PTRYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	PORT ROYAL
RBRDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROBARDS
RCMDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RICHMOND
RLVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	RUSSELLVL
RSTRKYES	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ROSETRRACE
SCRMKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SACRAMENTO
SDVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SADIEVILLE
SEBRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SEBREE
SHGVKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHARON GRV
SHVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SHELBYVL
SLGHKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SLAUGHTERS
SLPHKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SULPHUR
SLVSKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SALVISA
SNTNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANTON
SPFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MACKVILLE
SPFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	MOORESVL
SPFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SPRINGFLD
SSVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SIMPSONVL
STCHKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	ST CHARLES
STFRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANFORD
STGRKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STAMPNGRND
STNLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STANLEY
STONKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STONE
STRGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	STURGIS
SWSNKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	SOWILLIMSN
TRE NKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TRENTON
TYVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	TAYLORSVL
UTICKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	UTICA
VIRGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	VIRGIE
WACOKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WACO
WDDYKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WADDY
WHBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESBURG
WHVLKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WHITESVL
WLBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLIAMSBG
WLVLYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	W LOUISVL
WNCHKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER
WNCHKYPV	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WINCHESTER
WRFDKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WARFIELD
WSBGKYMA	BELLSOUTH TELECOMM INC DBA SOUTH CENTRAL BELL TEL	WILLISBURG

## T-Mobile Wire Centers

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
LKPKKYLP	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.	BLEDSON
HYDNKYXA	LESLIE COUNTY TELEPHONE CO.	HYDEN
STNTKYXA	LESLIE COUNTY TELEPHONE CO.	STINNETT

## T-Mobile Wire Centers

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

T-Mobile Wire Centers

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

## T-Mobile Wire Centers

CLLI CODE	COMPANY NAME	WIRE CENTERS
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
IRVNLKYXA	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.	SHEPHEHSV
ZNTNKYXA	WINDSTREAM KENTUCKY WEST, INC.	ZONETON



Sprint Wire Centers

NON-RURAL TELEPHONE COMPANY WIRE CENTERS

<b>Non-Rural Telephone Company</b>	<b>Study Area Code</b>	<b>Wire Center (CLLI Code)</b>	<b>Exchange</b>
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	ALBYKYXA	ALBANY
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	ASLDKYXA	ASHLAND
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	BEREKYXA	BEREA
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	BRSDKYXA	BURNSIDE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	BRVLKYXA	BRADFORDSVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	BSVLKYXA	BURKESVILLE2
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	BTVLKYXA	BRYANTSVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	CECLKYXA	CECILIA
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	CLMAKYXA	COLUMBIA
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	CMVLKYXA	CAMPBELLSVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	CTBGKYXA	CATLETTSBURG
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	EWNGKYXA	EWING
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	EZTWKYXA	ELIZABETHTOWN
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	FMBGKYXA	FLEMINGSBURG
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	FMBGKYXA	WASHINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	GLSGKYXA	GLASGOW1
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	GNBGKYXB	GREENSBURG
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	GNUPKYXA	GREENUP
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	GRSNKYXA	GARRISON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	GYSNKYXA	GRAYSON

Sprint Wire Centers

WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	HGVLKYXA	HODGENVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	HLBOKYXA	HILLSBORO
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	HTVLKYXE	HUSTONVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	HZRDKYXA	HAZARD
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	HZRDKYXA	LEATHERWOOD
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LBNNKYXA	LEBANON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LBRTKYXA	LIBERTY
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LNCSKYXA	LANCASTER
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LRTTKYXA	LORETTO
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LTFDKYXA	LEITCHFIELD
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYUK	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXA	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXB	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXC	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXD	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXE	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXF	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	LXTNKYXG	LEXINGTON
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	MDWYKYXA	MIDWAY
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	MEDSKYXA	MEADS
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	MNTIKYXA	MONTICELLO
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	MRHDKYXA	MOREHEAD
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	NANCKYXA	NANCY

Sprint Wire Centers

WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	NCVLKYXA	NICHOLASVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	OLHLKYXA	OLIVE HILL
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	OWVLKYXA	OWINGSVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	PNLCKYXE	PAINT LICK
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	RSSLKYXB	RUSSELL
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	SCVLKYXA	SCOTTSVILLE1
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	SHBGKYXA	SHARPSBURG
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	SHDNKYXA	SOUTH HARDIN
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	SLLCKYXA	SALT LICK
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	SMRTKYXA	SOMERSET
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	SSHRKYXA	SOUTH SHORE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	TLBOKYXA	TOLLESBORO
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	TMVLKYXA	TOMPKINSVILLE
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	VICCKYXA	VICCO
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	VNBGKYXA	VANCEBURG
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	VRSLKYXA	VERSAILLES
WINDSTREAM KENTUCKY EAST, INC. - LEXINGTON	269690	WLMRKYXA	WILMORE
CINCINNATI BELL, INC.	265061	ALXNKYAL	ALEXANDRIA1
CINCINNATI BELL, INC.	265061	ALXNKYAL	ALEXANDRIA2
CINCINNATI BELL, INC.	265061	BTLRKYBR	BUTLER
CINCINNATI BELL, INC.	265061	BURLKYBN	BOONE1
CINCINNATI BELL, INC.	265061	BURLKYBN	BOONE2
CINCINNATI BELL, INC.	265061	CRTDKYCT	WILLIAMSTOWN
CINCINNATI BELL, INC.	265061	CVTNKYCN	COVINGTON
CINCINNATI BELL, INC.	265061	FLRNKYFL	BOONE1
CINCINNATI BELL, INC.	265061	FLRNKYFL	BOONE2
CINCINNATI BELL, INC.	265061	FLRNKYFL	COVINGTON

Sprint Wire Centers

CINCINNATI BELL, INC.	265061	FTTHKYFT	COVINGTON
CINCINNATI BELL, INC.	265061	GLCOKYGC	GLENCOE
CINCINNATI BELL, INC.	265061	INDPKYIN	INDEPENDENCE1
CINCINNATI BELL, INC.	265061	INDPKYIN	INDEPENDENCE2
CINCINNATI BELL, INC.	265061	LKPKKYL	COVINGTON
CINCINNATI BELL, INC.	265061	WLTNKYWL	WALTON1
CINCINNATI BELL, INC.	265061	WLTNKYWL	WALTON2
CINCINNATI BELL, INC.	265061	WLTWKYWT	WILLIAMSTOWN
CINCINNATI BELL, INC.	265061	WRSWKYWR	WARSAW
BELLSOUTH-KY	265182	BDFRKYMA	BEDFORD
BELLSOUTH-KY	265182	BGDDKYMA	BAGDAD
BELLSOUTH-KY	265182	BLFDKYMA	BLOOMFIELD
BELLSOUTH-KY	265182	BNTNKYMA	BENTON
BELLSOUTH-KY	265182	BRGNKYMA	BURGIN
BELLSOUTH-KY	265182	BRMNKYMA	BREMEN
BELLSOUTH-KY	265182	BRTWKYES	BARDSTOWN
BELLSOUTH-KY	265182	BVDMKYMA	BEAVER DAM
BELLSOUTH-KY	265182	BWLGKYMA	BOWLING GREEN
BELLSOUTH-KY	265182	BWLGKYMA	WOODBURN
BELLSOUTH-KY	265182	CADZKYMA	CADIZ
BELLSOUTH-KY	265182	CHPLKYMA	CHAPLIN
BELLSOUTH-KY	265182	CLHNKYMA	CALHOUN
BELLSOUTH-KY	265182	CMBGKYMA	CAMPBELLSBURG
BELLSOUTH-KY	265182	CNCYKYMA	CENTRAL CITY
BELLSOUTH-KY	265182	CNTWKYMA	CENTERTOWN
BELLSOUTH-KY	265182	COTNKYMA	CROFTON
BELLSOUTH-KY	265182	CRBNKYMA	CORBIN
BELLSOUTH-KY	265182	CRBOKYMA	CRAB ORCHARD
BELLSOUTH-KY	265182	CRTNKYMA	CARROLLTON
BELLSOUTH-KY	265182	CYDNKYMA	CORYDON
BELLSOUTH-KY	265182	CYNTKYMA	CYNTHIANA
BELLSOUTH-KY	265182	DAVLKYMA	DANVILLE
BELLSOUTH-KY	265182	DWSPKYES	DAWSON SPRINGS
BELLSOUTH-KY	265182	EDVLKYMA	EDDYVILLE
BELLSOUTH-KY	265182	EKTNKYMA	ELKTON
BELLSOUTH-KY	265182	EMNKNYES	EMINENCE
BELLSOUTH-KY	265182	EMNKNYPL	CROPPER
BELLSOUTH-KY	265182	ENSRKYMA	ENSOR
BELLSOUTH-KY	265182	ERTNKYMA	EARLINGTON
BELLSOUTH-KY	265182	FKLNKYMA	FRANKLIN

Sprint Wire Centers

BELLSOUTH-KY	265182	FLTNKYMA	CAYCE
BELLSOUTH-KY	265182	FLTNKYMA	FULTON
BELLSOUTH-KY	265182	FLTNKYMA	SOUTH FULTONTN
BELLSOUTH-KY	265182	FLTNKYMA	WATER VALLEY
BELLSOUTH-KY	265182	FNVLKYMA	FINCHVILLE
BELLSOUTH-KY	265182	FORDKYMA	FORD
BELLSOUTH-KY	265182	FRFTKYES	FRANKFORT
BELLSOUTH-KY	265182	FRFTKYMA	FRANKFORT
BELLSOUTH-KY	265182	GBVLKYMA	GILBERTSVILLE
BELLSOUTH-KY	265182	GHNTKYMA	GHENT
BELLSOUTH-KY	265182	GNVLKYMA	GREENVILLE
BELLSOUTH-KY	265182	GRACKYMA	GRACEY
BELLSOUTH-KY	265182	GRTWKYMA	GEORGETOWN
BELLSOUTH-KY	265182	HABTKYMA	HABIT
BELLSOUTH-KY	265182	HANSKYMA	HANSON
BELLSOUTH-KY	265182	HBVLKYMA	HEBBARDSVILLE
BELLSOUTH-KY	265182	HDBGKYMA	CORNISHVILLE
BELLSOUTH-KY	265182	HDBGKYMA	HARRODSBURG
BELLSOUTH-KY	265182	HNSNKYMA	HENDERSON
BELLSOUTH-KY	265182	HPVLKYMA	HOPKINSVILLE
BELLSOUTH-KY	265182	HRFRKYMA	HARTFORD
BELLSOUTH-KY	265182	HRLNKYMA	HARLAN
BELLSOUTH-KY	265182	KKVLKYMA	KIRKSVILLE
BELLSOUTH-KY	265182	LBJTKYMA	LEBANON JUNCTION
BELLSOUTH-KY	265182	LGRNKYES	LAGRANGE
BELLSOUTH-KY	265182	LRBGKYMA	LAWRENCEBURG
BELLSOUTH-KY	265182	LSVLKY26	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYAN	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYAP	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYBE	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYBR	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYCW	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYFC	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYHA	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYJT	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYOA	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYSH	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYSL	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYSM	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYTS	LOUISVILLE

Sprint Wire Centers

BELLSOUTH-KY	265182	LSVLKYVS	LOUISVILLE
BELLSOUTH-KY	265182	LSVLKYWE	LOUISVILLE
BELLSOUTH-KY	265182	LVMRKYMA	LIVERMORE
BELLSOUTH-KY	265182	MACEKYMA	MACEO
BELLSOUTH-KY	265182	MDVIKYMA	MADISONVILLE
BELLSOUTH-KY	265182	MGTWKYMA	MORGANTOWN
BELLSOUTH-KY	265182	MLTNKYMA	MILTON
BELLSOUTH-KY	265182	MRGPKYMA	MORTONS GAP
BELLSOUTH-KY	265182	MRRYKYMA	MURRAY
BELLSOUTH-KY	265182	MTEDKYMA	MT EDEN
BELLSOUTH-KY	265182	MTSTKYMA	MT STERLING
BELLSOUTH-KY	265182	MYFDKYMA	MAYFIELD
BELLSOUTH-KY	265182	NEBOKYMA	NEBO
BELLSOUTH-KY	265182	NRVLKYMA	NORTONVILLE
BELLSOUTH-KY	265182	OKGVKYES	OAK GROVE
BELLSOUTH-KY	265182	OKGVKYES	SOUTH OAK GROVE
BELLSOUTH-KY	265182	OWBOKYMA	OWENSBORO
BELLSOUTH-KY	265182	PARSKYMA	LITTLE ROCK
BELLSOUTH-KY	265182	PARSKYMA	NORTH MIDDLETOWN
BELLSOUTH-KY	265182	PARSKYMA	PARIS
BELLSOUTH-KY	265182	PDCHKYIP	PADUCAH
BELLSOUTH-KY	265182	PDCHKYLO	PADUCAH
BELLSOUTH-KY	265182	PDCHKYMA	PADUCAH
BELLSOUTH-KY	265182	PDCHKYRL	PADUCAH
BELLSOUTH-KY	265182	PDCHKYRL	SYMSONIA
BELLSOUTH-KY	265182	PIVLKYMA	PINEVILLE
BELLSOUTH-KY	265182	PLRGKYMA	PLEASANT RIDGE
BELLSOUTH-KY	265182	PNTHKYMA	PANTHER
BELLSOUTH-KY	265182	PNVLKYMA	PAINTSVILLE
BELLSOUTH-KY	265182	PRBGKYES	PRESTONSBURG
BELLSOUTH-KY	265182	PRTNKYES	PRINCETON
BELLSOUTH-KY	265182	RBRDKYMA	ROBARDS
BELLSOUTH-KY	265182	RCMDKYMA	RICHMOND
BELLSOUTH-KY	265182	RLVLKYMA	RUSSELLVILLE
BELLSOUTH-KY	265182	RSTRKYES	ROSE TERRACE
BELLSOUTH-KY	265182	SDVLKYMA	SADIEVILLE
BELLSOUTH-KY	265182	SEBRKYMA	SEBREE
BELLSOUTH-KY	265182	SHVLKYMA	SHELBYVILLE
BELLSOUTH-KY	265182	SLGHKYMA	SLAUGHTERS
BELLSOUTH-KY	265182	SLPHKYMA	SULPHUR

Sprint Wire Centers

BELLSOUTH-KY	265182	SLVSKYMA	SALVISA
BELLSOUTH-KY	265182	SPFDKYMA	MACKVILLE
BELLSOUTH-KY	265182	SPFDKYMA	MOORESVILLE
BELLSOUTH-KY	265182	SPFDKYMA	SPRINGFIELD
BELLSOUTH-KY	265182	SRGHKYMA	SORGHO
BELLSOUTH-KY	265182	SSVLKYMA	SIMPSONVILLE
BELLSOUTH-KY	265182	STCHKYMA	ST CHARLES
BELLSOUTH-KY	265182	STGRKYMA	STAMPING GROUND
BELLSOUTH-KY	265182	STNLKYMA	STANLEY
BELLSOUTH-KY	265182	TYVLKYMA	TAYLORSVILLE
BELLSOUTH-KY	265182	WACOKYMA	WACO
BELLSOUTH-KY	265182	WDDYKYMA	WADDY
BELLSOUTH-KY	265182	WLBGKYMA	WILLIAMSBURG
BELLSOUTH-KY	265182	WLVLKYMA	WEST LOUISVILLE
BELLSOUTH-KY	265182	WNCHKYMA	WINCHESTER
BELLSOUTH-KY	265182	WSPNKYMA	WEST POINT

## VERIZON RATE CENTERS

Rate Center	State	ZIP
ASHLAND, KY	KY	41105
AUGUSTA, KY	KY	41002
BARBOURVL, KY	KY	40906
BARDWELL, KY	KY	42023
BEDFORD, KY	KY	40006
BENTON, KY	KY	42025
BEREA, KY	KY	40403
BROOKSVL, KY	KY	41004
BURNSIDE, KY	KY	42519
CADIZ, KY	KY	42211
CARLISLE, KY	KY	40311
CARROLLTON, KY	KY	41008
CLINTON, KY	KY	42031
COVINGTON, KY	KY	41011
CYNTHIANA, KY	KY	41031
DANVILLE, KY	KY	40422
DIXON, KY	KY	42409
FLEMINGSBG, KY	KY	41041
FRANKFORT, KY	KY	40601
FRENCHBURG, KY	KY	40322
FULTON, KY	KY	42041
GEORGETOWN, KY	KY	40324
HENDERSON, KY	KY	42419
HICKMAN, KY	KY	42050
HUSTONVL, KY	KY	40437
JUNCTIONCY, KY	KY	40440
LA CENTER, KY	KY	42056
LA GRANGE, KY	KY	40031
LANCASTER, KY	KY	40446
LAWRENCEBG, KY	KY	40342
LEBANONJCT, KY	KY	40150
LEXINGTON, KY	KY	40507
LIBERTY, KY	KY	42539
LONDON, KY	KY	40744
LOUISVILLE, KY	KY	40211
MADISONVL, KY	KY	42431
MANCHESTER, KY	KY	40962
MARION, KY	KY	42064
MAYFIELD, KY	KY	42066
MAYSVILLE, KY	KY	41056
MEADS, KY	KY	41101
MIDDLESBO, KY	KY	40965
MOREHEAD, KY	KY	40351
MORGANFLD, KY	KY	42437
MT OLIVET, KY	KY	41064
MT VERNON, KY	KY	40456



## VERIZON RATE CENTERS

Rate Center	State	ZIP
MTSTERLING, KY	KY	40353
MURRAY, KY	KY	42071
OLIVE HILL, KY	KY	41164
OWENSBORO, KY	KY	42301
OWENTON, KY	KY	40359
OWINGSVL, KY	KY	40360
PADUCAH, KY	KY	42001
PARIS, KY	KY	40362
PRINCETON, KY	KY	42445
RICHMOND, KY	KY	40475
RUSSELL, KY	KY	41169
SALT LICK, KY	KY	40371
SHELBYVL, KY	KY	40065
SOMERSET, KY	KY	42502
STANFORD, KY	KY	40484
SULPHUR, KY	KY	40070
VANCEBURG, KY	KY	41179
WACO, KY	KY	40385
WALLINSCRK, KY	KY	40873
WASHINGTON, KY	KY	41096
WILLIAMSBG, KY	KY	40769
WILLIAMSTN, KY	KY	41097
WINCHESTER, KY	KY	40392
HOPKINSVL, KY	KY	42240

## **EXHIBIT 6**

### **Key Management Bios**

**Mr. Gregg Iser** – CEO – Mr. Iser has more than sixteen (16) years of wireless experience. A former owner of the number one Sprint PCS dealership in Oklahoma, he has vast experience in marketing wireless services. Mr. Iser has helped smaller carriers, such as Pioneer Cellular, brand phone software to compete against Tier 1 carriers.

**Mr. Trevan Morrow** – COO (Owner). Mr. Morrow is a native Oklahoman and member of the Cherokee Tribe, Mr. Morrow has more than fifteen (15) years working as an attorney. Mr. Morrow has handled cases in that involved the telecommunications industry and has handled many corporate start up's, assisted in corporate structure, and corporate regulatory matters

Mr. Iser and Mr. Morrow began IM Telecom in 2011. In 2012, the FCC approved IM Telecom's Compliance Plan and subsequent to the FCC approval, IM Telecom has been offering telecommunication products in Oklahoma.