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September 6, 2013

Catrice C. Williams, Secretary
Massachusetts Department of
Telecommunications and Cable
1000 Washington Street
8th Floor, Suite 820
Boston, Massachusetts 02118-6500

Re: D. T. C. 13-1; Telrite Corporation d/b/a Life Wireless Application for Designation as an Eligible Telecommunications Carrier in the State of Massachusetts for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households (Low Income Only)

Dear Ms. Williams:

Enclosed for filing in the above referenced Docket are the Responses of Telrite Corporation d/b/a Life Wireless to the First Set of Information Requests by the Department of Telecommunications and Cable. We are also filing the enclosed Motion for Protective Order and certain Exhibits under seal, pursuant to 220 CMR 1.04(4) of the Department's Procedural Regulations.

Please return a stamped "Filed" copy in the envelope provided. Thank you for your usual courtesy and assistance.

Please do not hesitate to call me if you have any questions relating to this matter. Thank you for your usual courtesy and assistance.

Sincerely,

A handwritten signature in cursive script that reads "J. Andrew Gipson".

J. Andrew Gipson

JAG/ssb

cc: Brian Lisle

{JX072596.1}

JONES WALKER LLP

ALABAMA » ARIZONA » CALIFORNIA » DISTRICT OF COLUMBIA » FLORIDA » GEORGIA » LOUISIANA » MISSISSIPPI » NEW YORK » TEXAS

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 13-1

July 9, 2013

Telrite Corporation d/b/a Life Wireless Application for Designation as an Eligible Telecommunications Carrier in the State of Massachusetts for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households (Low Income Only)

**RESPONSES TO FIRST SET OF INFORMATION REQUESTS
ISSUED BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO TELRITE CORPORATION D/B/A LIFE WIRELESS**

Prepared by Brian Lisle, President

SEPTEMBER 9, 2013

D.T.C. 1-1 Provide a current list of all states where Telrite or any of its affiliates has been designated as an ETC. For each state, indicate whether the designation is limited, and if so how, including any specific requirements imposed on or volunteered by Telrite or its affiliates. Provide complete and detailed documentation of any such designation, limitation(s), and/or requirement(s). Also, describe the amendments made to the Oklahoma designation.

RESPONSE: Current ETC designations included – EXHIBIT A

D.T.C. 1-2 Provide a current list of all states where Telrite or any of its affiliates has a petition currently pending for ETC designation and describe the status of each petition. If any petition has been denied, provide a copy of the denial issued by the commission or government agency.

RESPONSE: Pending ETC applications and status included – EXHIBIT B

D.T.C. 1-3 State whether the FCC, any state utilities commission, or any other government agency has, to date, rendered or entered a finding, criminal conviction (including plea agreements), or civil judgment (including money judgments) against Telrite, its executives, or managers, during the last ten years. Provide a copy of any such finding, conviction, plea agreement, or civil judgment entered against Telrite, its executives, or managers.

RESPONSE: See Confidential Response.

Further, Telrite is abiding by the April 18, 2012 Consent Decree resulting from the Notice of Apparent Liability (NAL) by the FCC Enforcement Bureau on April 16, 2008 (FCC 08-116). Evidently satisfied with Telrite's showing, the FCC approved Telrite's Lifeline Compliance Plan on December 26, 2012.

D.T.C. 1-4 State whether Telrite or any of its affiliates presently offer, or have in the past offered service in Massachusetts. If so, describe the scope of such service, including geographic areas of operation, types of customers served, and total number of Massachusetts customers.

RESPONSE: Telrite Corporation: Traditional Long Distance services. Since 2000 has served over 177,000 nationwide long distance accounts, 1179 MA Residential and Small to Medium business's. Presently there are 191 MA accounts in Active Status.

PureTalk USA: Post Paid Cellular services. Since 2005 has served over 42,000 nationwide post paid cellular accounts, 868 customers in MA where approximately 510 remain in an active status.

Pure Unlimited (formerly Pure Prepaid) Pre-Paid Cellular Services. Since 2005. Due to the lack of billing detail the number of customers is indeterminable.

Life Wireless: Life line supported pre-paid cellular Services. Since 2010. Over 750,000 accounts in 25 states. No MA Customers presently.

D.T.C. 1-5 Identify any and all ongoing litigation that affects or may affect the services offered or intended to be offered by Telrite in Massachusetts. Provide a copy of all judicial filings made in relation to such litigation.

RESPONSE: None.

D.T.C. 1-6 State whether Telrite is subject to any outstanding tax liabilities, late payments, or other liabilities due and owing to the Commonwealth of Massachusetts or any government and/or quasi-public entities in any other jurisdictions. If so, provide complete and detailed documentation identifying the amounts owed and explaining the reasons for such arrears.

RESPONSE: None.

D.T.C. 1-7 Provide a Certificate of Good Standing from Telrite's state of incorporation.

RESPONSE: Certificate of Good Standing included – EXHIBIT C

D.T.C. 1-8 State the length of time that Telrite has been in business, and the length of time that it has been providing Lifeline wireless service and non-Lifeline wireless service.

RESPONSE: Telrite has been in business since February 2000 and has been providing Lifeline since October 2010 beginning in Arkansas. Telrite and PureTalk Holdings has provided post-paid and pre-paid cellular services since 2005.

D.T.C. 1-9 Indicate all services which Telrite offers to non-Lifeline subscribers.

RESPONSE: Life Wireless also provides plans for people who do not qualify for assistance.
Life Wireless offers:

- Voicemail
- Text Messaging
- Call Waiting
- Three-way calling
- Call Forwarding
- Caller ID service No roaming charge
- No charge for domestic long distance calls
- Nationwide Calling
- Rollover Minutes
- Affordable Recharge Plans

D.T.C. 1-10 At page 7 of its Petition, Telrite states that it “has the financial and technical capability to provide lifeline service” and that “the wireline services offered by Telrite produced substantial net income.” With respect to these wireline services:

- a. Provide complete and detailed documentation about finances and operations including but not limited to the number of customers served, the number of wire centers, revenues, profitability; and

RESPONSE: 40918 Active wireline customers in all states.

- b. Provide Telrite’s performance measured by wireline service quality metrics including but not limited to trouble reports per hundred lines, troubles cleared within 24 hours, and average time for resolution of trouble reports.

RESPONSE: 561 total trouble tickets for both long distance and local service issues. Of those, 510 were long distance issues and were repaired within 24 hours.

D.T.C. 1-11 Provide complete and detailed documentation on the technical capability of Telrite to provide Lifeline services in Massachusetts, including a list of employees, their qualifications, and their previous experience in the telecommunications industry.

RESPONSE: Reggie McFarland: 36+ years telecom experience
Brian Lisle: 25+ years telecom experience
Brian Rathman: Computer Engineer, 15+ years telecom experience
Bryan Gleason: Network Operations Center Manager; 22+ years telecom experience
Crystal Swinton: Customer Service Manager; 20+ years telecom experience
Kristan Wagner: SAC group Manager; 14 months telecom experience, 8 years management experience.

D.T.C. 1-12 Provide the following for each of the last five years:

a. Profit and loss statements;

RESPONSE: Included. – Confidential EXHIBIT D

b. Balance sheets; and

RESPONSE: Included. – Confidential EXHIBIT D

c. Statement of cash flows.

RESPONSE: Included. – Confidential EXHIBIT D

D.T.C. 1-13 Provide financial projections for Telrite's Lifeline service business models both nationally and specifically for Massachusetts for the next three years. These projections should include costs, revenues, and profits from providing Lifeline service.

RESPONSE: 3-Year Forecast included. – Confidential EXHIBIT E

D.T.C. 1-14 State how long it will take Telrite to offer Lifeline service in Massachusetts from the date of approval, if the Petition is granted by the Department.

RESPONSE: Telrite can immediately begin offering service as soon as designation is granted.

D.T.C. 1-15 Pursuant to Rule 47 C.F.R. § 54.202(a)(3), describe in narrative form Telrite's ability to satisfy applicable consumer protection and service quality standards set forth in the Department's *Rules & Practices Relating to Telephone Service to Residential Customers* (D.P.U. 18448 (1977)).

RESPONSE: Telrite's has the ability to satisfy all applicable consumer protection and service quality standards set forth in the Department's Rules & Practices Relating to Telephone Service to Residential Customers (D.P.U. 18448 (1977) ("Telephone Service Rules")) as described below:

Rule 1: Telrite is familiar with and will apply definitions, as applicable, under Rule 1 of the Telephone Service Rules.

Rule 2: Telrite's materials, including enrollment materials, fully inform prospective customers of the rate plans available, including the lowest-priced Lifeline-eligible "free" plans (125 minutes with rollover/250 minutes without rollover). Telrite does not provide directories, but does advise applicants of its general services and equipment in materials provided in hard copy and via website. <http://www.lifewireless.com/>

Rule 3: As a prepaid wireless provider, customers know in advance the exact number of minutes and the cost of services (prepaid) in a given month. Therefore, customers do not expect nor receive invoices or bills in a traditional sense. However, Telrite makes available to all customers upon request a usage and payment history, including payment period, by calling customer service [and on its website].

Rule 4: Telrite does not require either security deposits or payment guarantee agreements as a prepaid wireless provider. This is one of the benefits available to Telrite customers, many of whom are low income customers who cannot afford a deposit.

Rule 5: As a prepaid wireless carrier, service is not discontinued to the customer unless the customer elects not to purchase additional minutes. In the case of Lifeline-eligible customers, the customers receive continuous low-income service in accordance with Universal Service Administrative Company and FCC guidelines, subject to being found no longer eligible for the program. In the event a customer no longer qualifies as Lifeline-eligible, Telrite follows the mandated Universal Service Administrative Company and FCC rules to discontinue the Lifeline subsidy and provides notice to the customer via text message and [other means?]. In those cases, the customer may elect to continue to receive non-Lifeline service by purchasing an alternative non-Lifeline plan, such that service is not interrupted.

Rule 6: Telrite has reviewed the complaint procedures outlined in Rule 6 and will abide by the procedures to resolve disputes. As noted above, billing disputes

would be a rare occurrence given the prepaid nature of the services provided by Telrite. However, complaints made by customers are initially handled by customer service personnel and are typically resolved by telephone.

Rule 7: Deferred payment plans under Rule 7 are not necessary or applicable to Telrite customers, since all services are prepaid.

Rule 8: The provisions of Rule 8 regarding discontinuance of elderly persons' service are not applicable, inasmuch as Telrite's procedures conform to the requirements of federal law regarding customer eligibility and notice. As noted above, any customer, regardless of age, may continue to receive service should they become non-Lifeline eligible by purchasing an alternative prepaid wireless services plan. Thus, discontinuance of service is not an issue for Telrite customers as it might have been in a traditional wireline post-paid context.

Rule 9: Telrite has available for all its customers Terms and Conditions which are provided at enrollment and are available on the website. These Terms and Conditions may constitute additional practices and policies which Telrite will file with the Department of Public Utilities if deemed necessary as a condition to ETC designation.

D.T.C. 1-16 Describe in narrative form the types of complaints Telrite receives from Lifeline subscribers in other jurisdictions where it operates as an ETC and the company's procedures to handle each of these complaints.

RESPONSE: Complaints Log is included. – Confidential EXHIBIT F

- Customer complaint is received. A Help Desk ticket may be issued for tracking and resolution if applicable.
- The appropriate staff member(s) is notified and the complaint is investigated.
- Staff immediately contacts the customer to ensure resolution requirements are understood. This is documented and may also be logged in the Help Desk system.
- Staff uses multiple tools including the order management system, customer service system, enrollment portal system, and any documentation available on the complaint.
- Staff completes investigation of complaint and escalates to Compliance Department if waste, fraud, or abuse is suspected.
- Customer is contacted with the resolution and their satisfaction is ensured.
- Resolution is documented and may also be recorded in the Help Desk database.

D.T.C. 1-17 At page 18 of its Petition, Telrite states it “will offer qualified consumers their choice of one of three Lifeline Service Plans.” At page 19 of its Petition, Telrite describes only two Lifeline plans with options of 125 or 250 anytime prepaid minutes per month at no charge and seven additional bundles of minutes called “top-up” minutes. With respect to these offerings, state:

- a. The number of Lifeline service plans Telrite plans on offering in Massachusetts;

RESPONSE: Qualified customers may choose from the following plans:

- (1) 125 Minute Plan with Rollover. This plan offers a text rate of three text per minute.
- (2) 250 Minute Plan without Rollover. This plan offers a text rate of three text per minute.

- b. Whether the top-up minutes are available for purchase to non-Lifeline subscribers;

RESPONSE: Non-Lifeline customers will be able to purchase additional airtime at authorized retail outlets located throughout the designated service area

- c. Whether data services are included in any of the Lifeline plans or top-up minutes and if so, describe the data option with specificity, and indicate the source of support; and

RESPONSE: Life Wireless does not provide Data Services on any of its existing handsets at this time.

- d. Whether text messages from Telrite to its Lifeline subscribers will count against the allotted amount of text messages.

RESPONSE: Telrite’s Lifeline plans offer a text rate of three text per minute

D.T.C. 1-18 Referring to Telrite's "Unlimited Talk and SMS" in certain of its "top-up" plans, at paragraph 6 of Telrite's terms of service submitted as Exhibit F, the company states that "unlimited does not mean unreasonable use" and that subscriber use in excess of 750 minutes per month for conference calling or call forwarding may result in termination or limits on service. With respect to these terms, state whether:

- a. "[L]ive dialogue between two individuals" exclusive of conference calling or call forwarding counts towards the aforementioned 750 minutes;

RESPONSE: A standard cellular call is considered to be a call that does not include the following types of usage:

- 1) informational services;
- 2) directory assistance or operator services;
- 3) multi-media usage;
- 4) Texting;
- 5) other usage as determined applicable by the Company.

Deduction of minutes for a completed call from a customer's handset will begin when the SEND key is pressed and will end when either party ends.

- b. Telrite still refers to such "top-up" plans as "unlimited" after terminating or limiting the service; and

RESPONSE: In practice, Telrite does not cap minutes of use on unlimited calling plans. However, this policy is needed to prevent misuse of the service, i.e. enterprise service, call center services, and etc. Telrite also uses the same language and limits that our underlying carrier uses. Refer to <http://www.att.com/shop/en/legalterms.html?toskey=wirelessCustomerAgreement#unlimitedVoiceServices>

- c. Telrite has received consumer complaints regarding such termination or limitation, including the number of complaints, and how Telrite handles such complaints.

RESPONSE: Spreadsheet with count included. – Confidential EXHIBIT G - AT&T has a monitoring team, who upon detection of traffic pumping, flags the subscriber's account and reports the account to Telrite for review. It is at Telrite's discretion whether the account will be cancelled or not. If Telrite decides to cancel the account, a notification is sent to the offenders that their service will be disconnected. Finally, Telrite disconnects the accounts of the offenders.

D.T.C. 1-19 Provide the terms and conditions of all warranties and refund policies applicable to handsets provided or sold to Lifeline subscribers.

RESPONSE: **Warranty Exchange Phone Policy:** LIFE WIRELESS does not manufacture our mobile phones or other equipment and is not responsible for any damage or injury caused by mobile phones or other equipment. For a defective or malfunctioning phone replacement, call LIFE WIRELESS Customer Service at 1-888-543-3620.

Life Wireless will replace the defective or malfunctioning phone with a new or refurbished handset once the customer returns the phone and the phone is inspected and deemed defective or malfunctioning at LIFE WIRELESS' discretion.

Within 30 days of activation:

Replacement batteries and chargers will be sent free of charge.

Handsets must be mailed back to us to determine if damaged by customer or defective. If damaged by customer a log will be placed on account to notify that we will need payment when customer calls back in. If defective, we will send a replacement with a card.

31 days and after activation:

For as long as the customer account remains active, we will issue a free replacement phone per the following guidelines:

A. Customer must mail the defective/damaged phone to us. - if the phone is determined to be defective we will ship out a replacement phone free of charge along with a recharge pin covering the cost of mailing the phone to us.

B. If the phone is determined to be damaged LW will notate on the account for next time the customer contacts us to notify that we must secure payment before shipping out a replacement phone. - Dead batteries / chargers / damaged SIMs will be charged a flat \$5.00.

Lost or Stolen Phones: If your Device is lost or stolen, you must contact us immediately to report the Device lost or stolen. If your Device is lost or stolen, you will be responsible for all charges incurred on your phone number until you report the theft or loss. You can report your Device as lost or stolen and suspend service without a charge by contacting us. You may request a replacement through customer service by paying a \$20 replacement fee. Replacements will be shipped within 24 business hours or receipt of payment. After you report the theft or loss to us, you remain responsible for complying with your other obligations under this Agreement including, but not limited to, payment of any monthly service fees. We and you have a duty to act in good faith and in a reasonable and responsible manner, including in connection with the loss or theft of your Device.

D.T.C. 1-20 State whether Telrite will impose an activation fee, change fee, early termination fee, or any other service fee for any of its Lifeline services. Provide a detailed description of any such fee(s) and explain whether the same or similar fee is imposed on non-Lifeline subscribers.

RESPONSE: Lifeline customers are not charged an activation fee, early termination fee, or any type of service fee. Non-Lifeline customers pay a non-recurring phone fee of \$20 and a monthly airtime fee of \$12.75, but are not charged an activation fee, early termination fee

D.T.C. 1-21 State whether Telrite's Lifeline subscribers incur roaming charges.

RESPONSE: Customers who use their service outside of the Company's Designated Service Area will incur a Roaming Charge of \$0.00 per minute.

If so:

- a. State whether Lifeline subscribers will be notified before they incur roaming charges, and whether they can terminate the call before incurring such roaming charges;

RESPONSE: Roaming charges will not be assessed.

- b. Describe in narrative form how roaming charges will apply to Telrite's Massachusetts Lifeline subscribers; and

RESPONSE: Roaming charges will not be assessed.

- c. State whether additional charges will be incurred for 911 calls made while roaming.

RESPONSE: Roaming charges will not be assessed.

D.T.C. 1-22 State whether Telrite's Lifeline subscribers in Massachusetts will have free access to any web-based account management tools.

RESPONSE: Life Wireless does not charge customers for its web-based account management tools. Customer may establish its online account free of charge and will never be charged for using online account services.

D.T.C. 1-23 At page 9 of its Petition, Telrite states that it will not provide toll limitation service. Indicate whether Telrite has any mechanisms in place to restrict Lifeline subscribers from making international toll calls and if so, describe the mechanisms.

RESPONSE: International rates can be found at www.lifewireless.com. All International call usage is subject to applicable charges including but not limited to, international toll charges, airtime, taxes and surcharges. International call usage is applicable to voice service only.

D.T.C. 1-24 Provide a list of countries that Lifeline subscribers can make calls to and the rate per minute for each of these countries.

RESPONSE: Rates vary by country but may be found on our web-site www.lifewireless.com

D.T.C. 1-25 Describe in narrative form how Telrite provides directory assistance and operator services to its Lifeline subscribers.

RESPONSE: Customers may access Directory Assistance service from their Life Wireless handset. The rate for Directory Assistance calls is \$2.49 each request. Directory Assistance charges are applicable in addition to standard usage charges and are automatically deducted from the customer's balance of available minutes.

D.T.C. 1-26 Certify that Telrite will:

- a. Provide its Lifeline subscribers with 911 and E911 access regardless of activation status and availability of minutes;

RESPONSE: Certification included. – EXHIBIT H

- b. Provide E911 compliant handsets; and

RESPONSE: Certification included. EXHIBIT H

- c. Replace, at no additional charge to Lifeline subscribers, handsets that are not in compliance with E911.

RESPONSE: Certification included. EXHIBIT H

D.T.C. 1-27 Certify that Telrite will agree to abide by the statements in its Compliance Plan (dated December 19, 2012) in Massachusetts.

RESPONSE: Certification included. EXHIBIT H

D.T.C. 1-28 At page 8 of its Compliance Plan, Telrite states it “will not enroll customers at retail locations where Telrite does not have an agency agreement with the retailer” and that it “will require an agent retailer to have any employees involved in the enrollment process go through the standard Telrite field representative training.” With respect to these statements:

- a. Provide the total number of retail locations that Telrite will have in Massachusetts and the number of retail locations that Telrite will have an agency relationship with;

RESPONSE: At this time, Telrite does not have any agency agreements with retail locations in Massachusetts. Upon receiving ETC designation in Massachusetts, corporate Telrite staff will begin forming relationships with community partners (i.e. food banks, social service organizations, and etc.). In a market the size of Massachusetts Telrite would expect to have 25 - 50 such relationships depending on market conditions.

- b. Identify by name the retail locations in Massachusetts where potential Lifeline subscribers can enroll for Telrite’s Lifeline service;

RESPONSE: See response to A.

- c. Provide a copy of Telrite’s standard agency agreement; and

RESPONSE: Included.- EXHIBIT I

- d. Describe in narrative form any oversight or auditing Telrite conducts to ensure that agent retailers are complying with the requirements of the *Lifeline Reform Order*.

RESPONSE: All third-party contractors that conduct in-person enrollments are trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* in the same manner that direct sales representatives are trained. Such third-party contractors are also subject to the same tracking and monitoring of data entry, orders and behavior, as well as conducting data audits (tracking statistics on orders to look for irregularities), customer quality calls, secret shopping, no-notice field audits and photo audits (random audits requiring the representative to take a photo of the event set-up) as direct sales representatives.

D.T.C. 1-29 At page 16 of its Compliance Plan, Telrite states that its Compliance Department conducts data audits, secret shopping, no-notice field audits, and photo audits to discover potential waste, fraud, and abuse. Detail the manner and frequency of each of these actions.

RESPONSE: Type of Audits:

- Data Review: We perform a field representative data review (Health Check). This consists of checking activation data for any duplicate or similar entries the in Name, Address, DOB and SSN fields and reviewing the field representative’s report percentages. We investigate any percentage that exceeds the company average and try to determine what is causing the percentage to be outside the normal range. We have the ability to see both entered orders and attempted orders which aids in detecting misconduct. Activations, returns, address attempts, Important Notice “Yes” “No” selections and other data will be reviewed on a regular basis to detect trends. Any data trends identifying suspected fraud will be aggressively investigated and potentially result in immediate deactivation of the Representatives ability to input new orders and possible further disciplinary action. There will be no notice of Data Review audits.
- Quality-call: A percentage of new activations received from each Representative’s sales will be called to ensure that end user was properly enrolled and is satisfied with their experience. Calls won’t count against minute allotment. There will be no notice of Quality-call audits.
- On-Site: The Compliance Manager will also conduct field audits. Field audits will take between 2 and 4 hours. The Representatives will be grading according to the grading system. When possible, an on-site review of findings will be conducted. A summary of findings will be submitted to the management of Life Wireless. Any penalties, notifications, or improvements must be met by the deadline imposed or disciplinary action may be taken. There will be NO notice of an On-Site audit.

The following is a sample of what will be reviewed during On-Site audits:

<u>Site</u>	<u>Sign up</u>	<u>Other</u>
<u>Dress Code</u>	<u>One per household check</u>	<u>Fraud Prevention</u>
<u>Tent, Signs</u>	<u>ID check</u>	<u>Greeting Customers</u>
<u>Badges</u>	<u>One address check</u>	<u>Use of signs</u>
<u>Safety</u>	<u>Proof of Assistance</u>	<u>Outreach efforts</u>
<u>Attendance</u>	<u>Recharge Instructions</u>	<u>Address of site accurate</u>

Grading & Points

All audits will report the following findings with associated scored points and details:

VIOLATIONS: Disregard, refusal to comply, or knowingly violating company policies, federal and state regulations, program guidelines, and committing or assisting in fraudulent activities

PENALTY: Findings will be reported to management and immediate disciplinary action will be taken to potentially include termination of all agreements and/or employment with the company, forfeiture of commissions and prosecution.

NEEDS IMPROVEMENT: Partially meeting expectations of a Representative. Examples include: Trash in site location, conduct toward customers, and placement of non-policy or regulatory signs.

PENALTY: Deadline based corrective action documentation (with photo when applicable) that issue has been addressed. Multiple notations of infractions, repeated infractions or refusal to address infractions may result in disciplinary action.

OBSERVATIONS: Meant to improve the overall quality level expected of all Representatives.

PENALTY: There are no penalties associated with Observations. Representatives and Managers are expected to address observations to better their standing with the customer and company.

To ensure the maintenance of a compliant site setup on a daily basis, representatives will be subject to random photo site audits

Fifty (50) representatives will be randomly selected upon their log-in and attempt of their first order of the day. When selected, the representative will see the following notification on their screen:

Photo Site Audit Request

Attention:

- You have been randomly selected for a photo site audit.
- Please have a photo taken of your site with all set-up materials, **yourself wearing your Life Wireless Apparel & ID Badge**, and a **makeshift sign displaying today's date visible along with your agent ID.**
- E-mail the photo to compliance@lifewireless.com **WITHIN 30 MINUTES** of this request.
- **IN THE SUBJECT OF YOUR EMAIL – YOU MUST PROVIDE YOUR NAME AND AGENT ID**
- Failure to do so will result in your activation abilities being suspended.

- Please enter your initials acknowledging this request.

initials:



- The representative must enter their initials to continue any orders. Once they initial the box, their ID number and time stamp of the initialing will also be sent to compliance@lifewireless.com so the elapsed time can be tracked.
- Once a representative has been photo site audited, they will be removed from the pool of representatives to be randomly selected for at least one (1) week. Representatives need to respond within the time requested to avoid suspension. A missing (yellow) "FCC

compliance sign” is also grounds for suspension. A representative who is missing MANY of the compliant pieces may be suspended as well.

All types of audits are performed on a daily basis.

D.T.C. 1-30 Provide copies of the training materials referenced at pages 15 and 16 of Telrite's Compliance Plan.

RESPONSE: Field Compliance and Training Manual is Included – Confidential EXHIBIT J

D.T.C. 1-31 At page 12 of its Petition, Telrite states that it will “advertise the availability of its services throughout its Service Area using media of general distribution” and that it “targets its advertising”:

- Identify by name each media outlet in Massachusetts that Telrite plans to use to advertise its Lifeline services and charges;

RESPONSE: See EXHIBIT K

Telrite runs all advertising through means of mass distribution. In Massachusetts, Telrite would air its series of Lifeline Public Service Announcements and advertising on some combination of local broadcast television stations listed in Exhibit K. Telrite runs all programming on local broadcast stations and not cable so as all customers have access free of charge. Telrite does not yet know the cost of advertising in the Massachusetts market, because charges fluctuate with demand and are seasonally impacted.

- b. Provide copies of marketing materials Telrite plans to use in Massachusetts; and

RESPONSE: See included Massachusetts Marketing and Advertising Plan – Confidential EXHIBIT L

- c. Describe in detail Telrite’s outreach plans for Massachusetts and clarify how Telrite “targets its advertising.”

RESPONSE: See included Massachusetts Marketing and Advertising Plan – Confidential EXHIBIT L

D.T.C. 1-32 Certify that Telrite will comply with the procedures and requirements in the *Lifeline Reform Order* regarding:

- a. Screening applicants using the National Lifeline Accountability Database to be established as set forth in 47 C.F.R. §§ 54.404(b)(1)-(10);

RESPONSE: Certification included. EXHIBIT H

- b. The carrier's obligations to offer Lifeline, including de-enrollment requirements, established in 47 C.F.R. §§ 54.405(a)-(e)(1)-(4);

RESPONSE: Certification included. EXHIBIT H

- c. The subscriber eligibility determination and certification requirements established in 47 C.F.R. § 54.410(a)-(g) to the extent applicable;

RESPONSE: Certification included. EXHIBIT H

- d. Annual certifications required by ETCs established in 47 C.F.R. §§ 54.416(a), (b);

RESPONSE: Certification included. EXHIBIT H

- e. Record keeping requirements established in 47 C.F.R. § 54.417;

RESPONSE: Certification included. EXHIBIT H

- f. Audit requirements, to the extent applicable, established in 47 C.F.R. §54.420; and

RESPONSE: Certification included. EXHIBIT H

- g. Annual reporting requirements established in 47 C.F.R. § 54.422.

RESPONSE: Certification included. EXHIBIT H

D.T.C. 1-33 Certify that Telrite will comply with the applicable requirements established by the Department in the *Virgin Mobile ETC Order*, *T-Mobile ETC Order*, *Stand Up ETC Order*, and *Budget PrePay ETC Order*.

RESPONSE: Certification included. EXHIBIT H

D.T.C. 1-34 As outlined in the *Stand Up ETC Order*, certify that Telrite will:

- a. Provide quarterly reporting to the Department of subscriber accounts terminated for inactivity;

RESPONSE: Certification included. EXHIBIT H

- b. Provide quarterly reporting of Lifeline subscribers' complaints to the Department regarding Telrite's Lifeline service and participate in dispute resolution by the Department's Consumer Division;

RESPONSE: Certification included. EXHIBIT H

- c. Include notice of the Department's dispute resolution procedures for Lifeline- related issues at the point of sale and via Telrite's customer service call centers;

RESPONSE: Certification included. EXHIBIT H

- d. Provide reporting to the Department of USF support received for Massachusetts Lifeline subscribers;

RESPONSE: Certification included. EXHIBIT H

- e. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline subscribers;

RESPONSE: Certification included. EXHIBIT H

- f. Notify the Department of any changes to the rates, terms, or conditions of its Lifeline service that clearly benefit Lifeline subscribers (e.g., the *only* change is additional minutes or reduced cost);

RESPONSE: Certification included. EXHIBIT H

- g. Give the Department 30 days advance notice of any changes to the rates, terms, or conditions of its Lifeline service that do not clearly and solely benefit all of its Massachusetts Lifeline subscribers;

RESPONSE: Certification included. EXHIBIT H

- h. Include the Department's contact information for consumer complaints on its Lifeline application, Lifeline subscriber receipts if applicable,

Lifeline terms and conditions, and marketing materials for Lifeline service;

RESPONSE: Certification included. EXHIBIT H

- i. Provide Public Safety Answering Points self-certification to the Department; and

RESPONSE: Certification included. EXHIBIT H

- j. Provide annually the certification of an officer of Telrite that it (1) has policies and procedures in place to review Lifeline subscribers' documentation of income and program-based eligibility; (2) is in compliance with all federal Lifeline certification procedures; and (3) has obtained a valid certification form for each Lifeline subscriber for whom the carrier seeks Lifeline reimbursement.

RESPONSE: Certification included. EXHIBIT H

D.T.C. 1-35 State whether Telrite intends to draw more than \$5 million in Lifeline support annually. If yes, state whether Telrite has selected an independent auditor to assess its compliance with program requirements set forth in Rule 47 C.F.R. § 54.420 and provide the name of the auditor.

RESPONSE: Yes, Telrite intends to draw more than \$5 million in Lifeline support annually. Telrite has not selected a low-income program audit in accordance with 47 CFR 54.420. The FCC is still designing the audit and has not published a Public Notice regarding the process. Telrite will comply with the audit requirements once the details become available

D.T.C. 1-36 State whether Telrite plans to confirm if potential Lifeline subscribers are already enrolled in Lifeline through another ETC which does not utilize CGM, and if so, explain how it plans to do so.

RESPONSE: Presently there is no way to accomplish this task via a database dip and the reason behind the FCC's NLAD database. Life Wireless asks the enrollee up front if it has a Lifeline supported service through another Lifeline provider and it will check for internal duplication as well as through the CGM database.

D.T.C. 1-37 Provide the results of all audits performed by CGM on Telrite during the last five years.

RESPONSE: CGM audit results included – Confidential EXHIBIT M

D.T.C. 1-38 Provide sample certification and annual verification (or re-certification) forms to be used by Telrite in Massachusetts that satisfy 47 C.F.R. §§ 54.410(d), (f).

RESPONSE: Certification and Recertification forms included – EXHIBIT N

D.T.C. 1-39 Provide a copy of the resale contract Telrite has with its underlying facilities-based carrier(s) and provide:

RESPONSE: At&T Mobility Reseller Agreements with Amendments included (unable to obtain Amendment no. 2 at this time) Fairpoint, Level3, Qwest/Centurylink, Verizon Wireless, Time Warner Telecommunications Reseller Agreements included. – Confidential EXHIBIT O - unable to provide Verizon Business at this time.

a. The tenure of the contractual relationship;

RESPONSE: See included reseller agreements. Confidential EXHIBIT O

b. All options for renewal of the contract, if applicable; and

RESPONSE: See included reseller agreements. Confidential EXHIBIT O

c. All events that may result in the termination of the contract by either Telrite or the underlying facilities-based carrier(s).

RESPONSE: See included reseller agreements. Confidential EXHIBIT O

D.T.C. 1-40 At page 13 of its Petition, Telrite states that if it is designated as a wireless ETC, it “will provide service throughout its Service Area through a combination of its own facilities and the resale of services.” Describe in narrative form the facilities to which Telrite is referring.

RESPONSE: Telrite possesses its own facilities in the form of switching and other call platform and customer service facilities located in Georgia. Telrite utilizes these facilities in the provision of wireless services. However, Telrite was granted blanket forbearance from the facilities requirement for purposes of offering low-income services as an eligible telecommunications carrier in connection with the FCC's approval of its compliance plan in December, 2012. Therefore, for purposes of the current petition for designation as an eligible telecommunications carrier, Telrite is relying on the forbearance from the facilities requirement, even though Telrite does possess and utilize its own facilities.

D.T.C. 1-41 Describe in narrative form Telrite's ownership structure and include a list of all shareholders and their ownership stake in the company.

RESPONSE: R.P. McFarland, CEO
Brian Lisle, President
Brian Rathman, Vice President of Network Operations
Kelly Jesel, CFO

- D.T.C. 1-42 Explain in detail how Telrite's proposed Lifeline plans for Massachusetts provide unique advantages as compared to the Lifeline offerings from the following ETCs:
- a. Verizon, the incumbent provider;
 - b. Tracfone d/b/a Safelink (<https://www.safelinkwireless.com/>);
 - c. Virgin Mobile d/b/a Assurance Wireless (www.assurancewireless.com/);
 - d. T-Mobile d/b/a InReach (www.t-mobile.com/lifeline);
 - e. Global Connection Inc. of America d/b/a Stand Up Wireless (*Stand Up ETC Order* at 7-9);
 - f. Budget PrePay, Inc. (*Budget PrePay ETC Order* at 7-8).

RESPONSE: Life Wireless operates on the AT&T GSM network, the largest in the nation. As such, any working non-locked GSM handset will operate on the Life Wireless network. Customers are able to purchase their own replacement GSM handset and simply swap out the SIM card. Life Wireless also offers a variety of competitively priced recharge plans. These features make Telrite's Lifeline offering unique and give eligible consumers in Massachusetts a choice, not yet available in the market place.

D.T.C. 1-43 At page 15 of the Petition, Telrite states: “In addition, the inclusion of domestic telephone toll calling as a part of Telrite’s flat-rate wireless offering allows consumers to avoid the risks of becoming burdened with significant and unexpected per-minute charges for domestic telephone toll and overage charges. These per-minute overruns form the basis of a substantial number of consumer complaints to state and federal regulators.”

Provide documentation to support these statements.

RESPONSE: This is a relic from the wireline era where carriers had to offer Toll Limitation Services to customers that limited access to long distance service or outright blocked access to long distance calling. Without TLS low-income customers had the ability to complete LD calls where often the consumer could not afford to pay or felt the charges were excessive. Wireless carriers do not differentiate between local and long distance calling and therefore eliminate unexpected or significant toll charges.

D.T.C. 1-44 At page 24 of its Compliance Plan, Telrite states that it recently entered into a consent decree with the Enforcement Bureau of the FCC relating to an investigation initiated in 2004. With respect to this consent decree:

- a. Provide a copy of the document referenced in footnote 22 entitled "Telrite Corporation's Statement Seeking Reduction of Proposed Forfeiture";

RESPONSE: Copy included. – Confidential EXHIBIT P

- b. Provide a copy of all filed compliance reports referenced in paragraph 16 including reports that were to be issued 90 calendar days after the effective date and 12 months after the effective date;

RESPONSE: Copy included Confidential EXHIBIT P

- c. State the amount that Telrite paid to USAC for failing to pay USF contributions, Telecommunications Relay Services Fund contributions, numbering administration contributions, local number portability contributions, and regulatory fees, and for filing inaccurate Telecommunications Reporting Worksheets; and

RESPONSE: \$525,000

- d. State whether Telrite has paid the \$525,000 voluntary contribution to the United States Treasury referenced in paragraph 18.

RESPONSE: Yes, this was paid.

TELRITE CORPORATION
ETC Designations

State ETC Designations	Docket Number	Date Approved	Lifeline Service Only	Tribal/Non-Tribal	High Cost Support
Arizona	T-04288A-11-0405	2/20/13	Lifeline Only	Non-Tribal	No
Arkansas	10-078-U	10/27/10	Lifeline Only	Non-Tribal	No
Georgia	21955	8/22/11	Lifeline Only	Non-Tribal	No
Illinois	10-0513	5/4/11	Lifeline Only	Non-Tribal	No
Indiana	41052ETC58	4/4/12	Lifeline Only	Non-Tribal	No
Iowa	ETA-2013-0001	5/24/13	Lifeline Only	Non-Tribal	No
Kansas	13-RTTC-181-ETC	3/13/13	Lifeline Only	Non-Tribal	No
Kentucky	2013-00031	6/28/13	Lifeline Only	Non-Tribal	No
Louisiana	S-31512	12/14/10	Lifeline Only	Non-Tribal	No
Maine	2012-00168	1/29/13	Lifeline Only	Non-Tribal	No
Maryland	ML 129043	4/6/11	Lifeline Only	Non-Tribal	No
Michigan	U-16557	1/31/13	Lifeline Only	Non-Tribal	No
Minnesota	P-6862/M-11-132	11/30/11	Lifeline Only	Non-Tribal	No
Missouri	XO-2011-0062	11/10/10	Lifeline Only	Non-Tribal	No
Nebraska	C-4571/NUSF-88	5/29/13	Lifeline Only	Non-Tribal	No
Nevada	13-02009	4/23/13	Lifeline Only	Non-Tribal	No
Ohio	13-173-TP-UNC	5/15/13	Lifeline Only	Non-Tribal	No
Oklahoma	PUD 201100139	2/13/12	Lifeline Only	Tribal	No
Rhode Island	4291	12/21/11	Lifeline Only	Non-Tribal	No
South Carolina	2012-325-C	1/29/13	Lifeline Only	Non-Tribal	No
Texas	41018	1/28/13	Lifeline Only	Non-Tribal	No
Utah	12-2553-01	6/14/13	Lifeline Only	Non-Tribal	No
Washington State	UT-110321	6/13/13	Lifeline Only	Non-Tribal	No
West Virginia	10-1306-T-PC	12/2/10	Lifeline Only	Non-Tribal	No
Wisconsin	7709-TL-101	4/15/13	Lifeline Only	Non-Tribal	No
Puerto Rico	JRT-JRT-2011-SU-0001	7/1/11	Lifeline Only	Non-Tribal	No

Pending ETC Petitions	Docket Number	Date Filed	Lifeline Service Only	Request Tribal / Non-Tribal	High Cost Support	Current Status
California	AL #1	3/8/13	Lifeline Only	Non-Tribal	No	Under Review
Colorado	13A-0150T	3/6/13	Lifeline Only	Non-Tribal	No	Notice of Application Filed issued on 3/7/2013
Iowa	ETA-2013-0001	1/10/13	Lifeline Only	Non-Tribal	No	Anticipate Order very soon
Kentucky	2013-00031	1/22/13	Lifeline Only	Non-Tribal	No	Anticipate Order very soon
Massachusetts	D.T.C. 13-1	1/8/13	Lifeline Only	Non-Tribal	No	Supplement to Application filed 3/5/13; awaiting procedural schedule.
Mississippi	11-UA-125	1/27/11	Lifeline Only	Non-Tribal	No	Filed update to Data Response and need to provide information regarding FCC consumer fraud notice
Montana			Lifeline Only	Non-Tribal	No	Newly filed
Nebraska	C-4571/NUSF-88	1/11/12	Lifeline Only	Non-Tribal	No	Filed Amended Application to include state funds
Nevada	13-02009	2/15/13	Lifeline Only	Non-Tribal	No	Proposed Stipulation has been drafted and sent to Staff for consideration.
New Jersey	TO13010041	1/14/13	Lifeline Only	Non-Tribal	No	Data Requests received 3/8/13
North Dakota	PU-13-51	1/18/13	Lifeline Only	Non-Tribal	No	April 10 hearing scheduled
Ohio	13-0173-7P-UNCL	1/9/13	Lifeline Only	Non-Tribal	No	Expecting 2 nd Set of Data Requests 3/26/13
Oregon			Lifeline Only	Non-Tribal	No	Newly filed
Pennsylvania	P2011-2234287	4/4/11	Lifeline Only	Non-Tribal	No	Staff teleconference rescheduled to March date TBD. Data requests received.
South Dakota	TC13-022	1/18/13	Lifeline Only	Non-Tribal	No	Pre-hearing conference scheduled for 3/26/13 – Terrie not objecting to intervention – working with attorney for independent companies to resolve the issues on the service territories; Data Requests received and responses are due 4/17/13.
Utah	12-2553-01	6/20/12	Lifeline Only	Non-Tribal	No	Hearing set May 29, 2013; Draft Testimony filed; First set of data requests issued 2/26/13.
Vermont	(No Docket# Assigned Yet)	1/14/13	Lifeline Only	Non-Tribal	No	Pending
Washington	UT-110321	2/16/11	Lifeline Only	Non-Tribal	No	Amendment filed 1/29/13; Data responses sent to Staff 1/30/13.
Wyoming	62060-1-RA-13	3/15/2013	Lifeline Only	Non-Tribal	No	Notice of Application issued 3/19/2013

Exhibit B

STATE OF GEORGIA

Secretary of State
Corporations Division
313 West Tower
#2 Martin Luther King, Jr. Dr.
Atlanta, Georgia 30334-1530

CONTROL NUMBER : 0005243
DATE INC/AUTH/FILED : February 01, 2000
JURISDICTION : Georgia
PRINT DATE : 8/2/2013 1:36:05 PM

CERTIFICATE OF EXISTENCE

I, Brian P. Kemp, the Secretary of State of the State of Georgia, do hereby certify under the seal of my office that

TELRITE CORPORATION
A Domestic Corporation

was formed in the jurisdiction stated above or was authorized to transact business in Georgia on the above date. Said entity is in compliance with the applicable filing and annual registration provisions of Title 14 of the Official Code of Georgia Annotated and has not filed articles of dissolution, certificate of cancellation or any other similar document with the office of the Secretary of State.

This certificate relates only to the legal existence of the above-named entity as of the date issued. It does not certify whether or not a notice of intent to dissolve, an application for withdrawal, a statement of commencement of winding up or any other similar document has been filed or is pending with the Secretary of State.

This certificate is issued pursuant to Title 14 of the Official Code of Georgia Annotated and is prima-facie evidence that said entity is in existence or is authorized to transact business in this state.



A handwritten signature in black ink, appearing to read 'B: P. Kemp'.

Brian P. Kemp
Secretary of State

Tracking #: BVTNAUWd

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

D.T.C. 13-1

**IN THE MATTER OF TELRITE
CORPORATION D/B/A LIFE
WIRELESS' PETITION FOR LIMITED
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
IN MASSACHUSETTS FOR THE
LIMITED PURPOSE OF OFFERING
WIRELESS LIFELINE SERVICE TO
QUALIFIED HOUSEHOLDS**

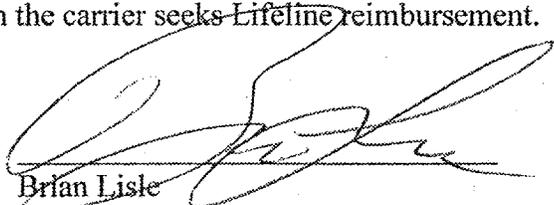
CERTIFICATION OF TELRITE CORPORATION D/B/A LIFE WIRELESS

The undersigned, Brian Lisle, does hereby certify as follows:

1. I serve as President of Telrite Corporation d/b/a Life Wireless ("Telrite").
2. I am authorized to execute this certification on behalf of Telrite.
3. This sworn certification is being provided by the appropriate corporate officer in response to certain information requests identified below which have been issued by the Commonwealth of Massachusetts, Department of Telecommunications and Cable ("D.T.C." or the "Department") in this docket.
4. In response to D.T.C. 1-26 Telrite certifies as follows:
 - a. Telrite will provide Lifeline subscribers with 911 or E911 access in the event their plan minutes are exhausted/expired or their handset is inactive. No fee is imposed for such emergency service.
 - b. Telrite provides E911 compliant handsets to its Lifeline subscribers.
 - c. Should a Lifeline subscriber choose to use an existing handset and Telrite determines that the existing handset is not E911 compliant, Telrite will replace, at no additional charge to the Lifeline subscriber, handsets that are not in compliance with E911.

5. In response to D.T.C. 1-27, Telrite certifies that it will abide by the statements made in its Compliance Plan, dated December 19, 2012, as approved by the Federal Communications Commission and provided as an exhibit to its Application filed with the Massachusetts Department of Telecommunications and Cable.
6. In response to D.T.C. 1-32, Telrite certifies that it will comply with the procedures and requirements in the *Lifeline Reform Order* regarding:
 - a. Screening applicants using the National Lifeline Accountability Database to be established as set forth in 47 C.F.R. §§ 54.404(b)(1)-(10);
 - b. The carrier's obligations to offer Lifeline, including de-enrollment requirements, established in 47 C.F.R. §§ 54.405(a)-(e)(1)-(4);
 - c. The subscriber eligibility determination and certification requirements established in 47 C.F.R. §§ 54.410(a)-(g) to the extent applicable;
 - d. Annual certifications required by ETCs established in 47 C.F.R. §§ 54.416(a), (b)
 - e. Record keeping requirements established in 47 C.F.R. § 54.417;
 - f. Audit requirements, to the extent applicable, established in 47 C.F.R. § 54.420; and
 - g. Annual reporting requirements established in 47 C.F.R. § 54.422.
7. In response to D.T.C. 1-33 and 1-34 Telrite certifies that it will comply with the applicable requirements established by the Department in the *Virgin Mobile ETC Order*, *T-Mobile ETC Order*, *Stand Up ETC Order* and *Budget PrePay ETC Order* as listed below:
 - a. Provide quarterly reporting to the Department of subscriber accounts terminated for inactivity;
 - b. Provide quarterly reporting of Lifeline subscriber complaints to the Department regarding its Lifeline service and agree to participate in dispute resolution by the Department's Consumer Division;
 - c. Include notice of the Department's dispute resolution procedures for Lifeline-related issues at the point of sale and via Telrite's customer service call centers;
 - d. Provide reporting to the Department of USF support received for Massachusetts Lifeline subscribers;

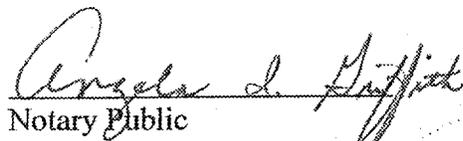
- e. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline service subscribers, if its Petition is approved;
- f. Notify the Department of any changes to the rates, terms, or conditions of its Lifeline service that clearly benefit Lifeline subscribers;
- g. Give the Department 30 days advance notice of any changes to the rates, terms, or conditions of its Lifeline service that do not clearly and solely benefit all of its Massachusetts Lifeline subscribers;
- h. Include the Department's contact information for a consumer complaints on its Lifeline application, Lifeline subscriber receipts if applicable, Lifeline terms and conditions, and marketing materials for Lifeline subscribers;
- i. Provide Public Safety Answering Points (PSAP) self-certification to the Department; and
- j. Provide annually the certification of an officer of Telrite that it (1) has policies and procedures in place to review Lifeline subscribers' documentation of income and program-based eligibility; (2) is in compliance with all federal Lifeline certification procedures; and (3) has obtained a valid certification form for each Lifeline subscriber for whom the carrier seeks Lifeline reimbursement.



Brian Lisle
President, Telrite Corporation d/b/a Life Wireless

Subscribed and sworn to before me
this 5th day of September __, 2013

(NOTARY SEAL)



Notary Public

Notary Public, Cobb County, Georgia
My Commission Expires July 2, 2015



NEW REPRESENTATIVE ON-BOARDING PROCEDURE PACKET

Master Representatives are responsible for submitting this Application Packet

Fully Completed Packets are to be Emailed or Faxed to:

1-888-761-9285 or onboarding@lifewireless.com

APPLICATION DATE: <input type="text"/>	POSITION: <u>(must choose one)</u> <input type="checkbox"/> Site Manager <input type="checkbox"/> Field Rep <input type="checkbox"/> 14 Day Shadow Rep Period
--	--

APPLICANT INFORMATION

Full Name: _____

Street Address: _____

City, State, Zip: _____

Cell: _____ Email Address: _____

Who is Your Master Rep: _____

Who is Your Site Mgr: _____
(for Field Reps and Shadow Reps)



LIFE WIRELESS REPRESENTATIVE ETHICAL CONDUCT ADDENDUM

As a representative of Life Wireless Holdings, LLC, your activities in the public square reflect upon not only yourself, but our company, as a whole. Further, the results of your productivity on behalf of Life Wireless Holdings, LLC is subject to audit by government entities and Life Wireless Auditors. These facts require that you conduct yourself in a manner which upholds the highest of ethical standards.

Therefore, in order to represent Life Wireless as a representative, you must be in agreement with the following statements and affirm your commitment with your initials by each, as well as with your legal signature at the bottom of this document.

1. _____ I understand that the Lifeline program provides a one-time subsidy, per household, which may be applied toward the activation costs associated with a new Life Wireless subscription. Therefore, should I have sufficient reason to believe that a prospective subscriber has previously received or is receiving the Lifeline service, whether from Life Wireless or another company, I will not submit a Life Wireless order on behalf of this customer.
2. _____ I will not engage in the act of forging lifeline online applications. I will submit an order as the result of interaction with a qualified, willing potential subscriber, who applies his/her own legal signature as affirmation of his/her desire to become a Life Wireless subscriber.
3. _____ I will not knowingly submit an order on behalf of a person who does not qualify for service under the guidelines set forth in the Lifeline program specific to the state in which I am working.
4. _____ I will submit orders on behalf of any qualified person wishing to subscribe to Life Wireless service, without regard to race, creed or ethnicity.
5. _____ I will not retain any document or form used in the enrollment process containing customer information deemed sensitive.

I understand and affirm that failure to adhere to standards of ethical conduct set forth by Life Wireless may result in the immediate suspension/termination of my privileges as a Life Wireless contractor. Further, I understand that serious breaches of these standards could possibly result in criminal and/or civil litigation against me. My legal signature below affirms my commitment.

Applicant Signature

Date _____



IMPORTANT ON-BOARDING INFORMATION

(Please Read and Initial at the bottom)

1. **BACKGROUND CHECK** - Once we receive this fully completed packet, you will receive an email with a website link to the Life Wireless mandatory background check. Results typically take 3 – 7 business days and are sent directly to Human Resources for review. Once approved, you and your Master Rep will receive an email informing you to continue with the On-Boarding Process. If rejected, the process will stop and an email notification will be sent out.
2. **TRAINING CLASSES** – Your Master Rep will secure a date and time for you to attend the Life Wireless University Training Class in Covington, GA or at a specified location. This is mandatory training and no exceptions will be made. Classes in Covington, GA are scheduled for the 1st and 3rd Thursday of each month and take approximately 3 hours. Any questions regarding training please email training@lifewireless.com.

<u>COVINGTON, GA LOCATION</u>	<u>CLASS TIMES</u>
Hampton Inn	Morning Class 9:00 AM
14460 Lochridge Blvd.	Afternoon Class 1:00 PM
Covington, GA 30014	
(678) 212-2500	

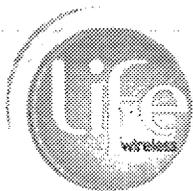
3. **REQUIRED APPAREL & CREDENTIALS** – Upon completion of Steps 1 and 2, you will be receiving the following: Photo ID Badge with signature and thumbprint, access to the Company Portal for keying in orders, and access to the Life Wireless Online Store where you can purchase approved Life Wireless apparel. It is **mandatory** that all representatives be neatly dressed with an approved logo Life Wireless shirt. Hats are not mandatory, but if worn, must have the logo. No short shorts or cut-off or holey jeans. You are required to place an apparel order within 3 business days from receiving the link. Reps not wearing proper apparel will be written up and may lose their activation privileges.

A LEGIBLE COPY OF A VALID STATE/GOVERNMENT ISSUED PHOTO IDENTIFICATION MUST BE SENT WITH THIS APPLICATION

Initials: _____

4 (30)	<u>WBZ</u>		<p>ID: "CBS 4" City: Boston, MA Owner: CBS Corporation Web Site: http://boston.cbslocal.com/ Station Info: Digital Full-Power - 825 kW</p>
5 (20)	<u>WCVB</u>		<p>City: Boston, MA Owner: Hearst Television Web Site: http://www.thebostonchannel.com/ Station Info: Digital Full-Power - 625 kW</p>
7	<u>WHDH</u>		<p>ID: "7 NBC" City: Boston, MA Owner: Sunbeam Television Web Site: http://www.whdh.com/ Station Info: Digital Full-Power - 29.7 kW Subchannels: 8.1 WHDH/NBC, 8.2 This TV</p>
25 (31)	<u>WFXT</u>		<p>ID: "FOX 25" City: Boston, MA Owner: Fox Television Stations Web Site: http://www.myfoxboston.com/ Station Info: Digital Full-Power - 780 kW</p>
46 (10)	<u>WLVI</u>		<p>ID: "Boston's CW" City: Cambridge, MA Owner: Sunbeam Television Web Site: http://www.cw56.com/ Station Info: Digital Full-Power - 550 kW</p>

4 (30)	<u>WBZ</u>		<p>ID: "CBS 4" City: Boston, MA Owner: CBS Corporation Web Site: http://boston.cbslocal.com/ Station Info: Digital Full-Power - 825 kW</p>
5 (20)	<u>WCVB</u>		<p>City: Boston, MA Owner: Hearst Television Web Site: http://www.thebostonchannel.com/ Station Info: Digital Full-Power - 625 kW</p>
7	<u>WHDH</u>		<p>ID: "7 NBC" City: Boston, MA Owner: Sunbeam Television Web Site: http://www.whdh.com/ Station Info: Digital Full-Power - 29.7 kW Subchannels: 8.1 WHDH/NBC, 8.2 This TV</p>
25 (31)	<u>WFXT</u>		<p>ID: "FOX 25" City: Boston, MA Owner: Fox Television Stations Web Site: http://www.myfoxboston.com/ Station Info: Digital Full-Power - 780 kW</p>
46 (10)	<u>WLVI</u>		<p>ID: "Boston's CW" City: Cambridge, MA Owner: Sunbeam Television Web Site: http://www.cw56.com/ Station Info: Digital Full-Power - 550 kW</p>



Life Wireless

Massachusetts Wireless Lifeline Service Application and Certification

Exhibit N

Mail or Fax completed and signed form to

Telrite Corporation / Life Wireless

PO Box 2840 Covington, GA 30015

FAX: 1-866-770-6110 / EMAIL: lwforms@lifewireless.com

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in Telrite Corporation / Life Wireless' 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: I hereby certify that I participate in at least one of the following programs (check one):

- Supplemental Nutrition Assistance Program (SNAP)
- Section 8 Federal Public Housing Assistance (FPHA)
- Medicaid (not Medicare)/Mass Health
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)/Fuel Assistance
- National School Lunch Program's free lunch program
- Emergency Assistance to Elderly, Disabled, and Children (EAEDC)
- Transitional Aid to Families with Dependent Children (TAFDC)
- Income at or below 135% of Federal Poverty Guidelines

Customer Application Information:

First Name: _____ Middle Name: _____ Last Name: _____

Date of Birth: Month: ___ Day: ___ Year: _____ Last Four Digits of Social Security Number (or Tribal ID Number): _____

If Qualifying for Lifeline by Income, number of Individuals in Household: _____

Home Telephone Number (if available): _____

Residential Address (P.O. Box NOT sufficient)

Number: _____ Apt: _____ Street _____ City _____

State: _____ Zip Code: _____

Address is (choose one): Permanent Temporary

Billing Address (if different from Residential Address) (P.O. Box IS sufficient)

Number: _____ Apt: _____ Street _____ City _____

State: _____ Zip Code: _____

Multiple households sharing and address:

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

Activation and usage requirement disclosures: This service is a prepaid service and you must personally activate it by calling 770-200-1000. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than

Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

Authorizations:

I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (e.g., name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

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:** _____

For Agent Use Only (check only 1 eligibility category and only 1 box under that category; do not copy or retain documentation):

Documents Acceptable Proof for Income-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, or
- A divorce decree, child support award, or other official document containing income information for at least three months time.

List B - Choose 1

- Program Participation card / document
- Prior year's statement of benefits
- Notice letter of participation
- Other official qualifying document: _____

Last 4 digits of Document from List B _____

Date of Proof Document: ____/____/____

Expiration Date of Proof Document: ____/____/____

Documents Acceptable Proof for Program-Eligibility

(choose 1 from each list A and B below)

List A - Choose 1

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid/Mass Health
- Section 8 Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)/Fuel Assistance
- National School Lunch Program's free lunch program
- Emergency Assistance to Elderly, Disabled, and Children (EAEDC)
- Transitional Aid to Families with Dependent Children (TAFDC)

Applicant Account Number	Rep / Agent Signature



[REDACTED]
[REDACTED]
[REDACTED]

September 6, 2013

Dear [REDACTED],

Each year Telrite Corporation and Life Wireless is required by State and Federal law to ensure Life Wireless customers are recertified for continued participation in our Lifeline program. You must recertify and provide proof of your continued participation in one of the eligible Lifeline programs. This authorization will only be used to verify your continued participation in these programs and will NOT be used for any other purpose.

To ensure your Life Wireless service is not interrupted beyond your service activation anniversary date it is necessary that the attached form be filled out in its entirety and sent back to Telrite Corporation d/b/a Life Wireless, **within 30 days of receipt of this letter**. If we do not receive the completed Recertification by the end of the month, your Life Wireless Lifeline service will be disconnected. Completed forms may be sent via email, US Mail or facsimile. See below for proper address information.

US Mail:
Telrite Corporation / Life Wireless
PO Box 2840
Covington, GA 30015

Email: lwforms@lifewireless.com

Fax: 1-866-770-6110

For additional information please call Customer Service at 1-888-543-3620 or by dialing 611 from your Life Wireless cell phone. On behalf of Telrite Corporation d/b/a Life Wireless, I want to thank you for choosing Life Wireless as your Lifeline service provider and look forward to receiving your completed recertification form **within 30 days of receipt of this letter**.

Sincerely,

Brian Lisle
President - Telrite Corporation d/b/a Life Wireless

Annual Certification and Verification Form

Telrite Corporation – LIFE Wireless
PO Box 2840
Covington, GA 30015
FAX: 1-866-770-6110
EMAIL: lwforms@lifewireless.com
Call today for more information: 1-888-543-3620

Each year as a participant in the lifeline program you are required by law to re-certify that you remain eligible to receive the Lifeline benefit. Re-certification will only take a few minutes but you must answer **all** of the below questions to retain service with Life Wireless and to continue receiving the Lifeline benefit.

Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit may 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.

1) I hereby authorize Life Wireless to access any records required to verify my statements and to confirm my eligibility for the Lifeline program. I also authorize Life Wireless to release any records required for the administration of the Lifeline program to the Universal Service Administrative Company (USAC), to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

Check One: I understand the above and agree I do not agree

Customer Validation and Eligibility: The information you enter below must match the detail Life Wireless has on file as accumulated at time of enrollment into the Lifeline program.

First Name: _____ Middle Initial: _____ Last Name: _____

Print the last four digits of your Social Security Number:

Date of Birth (DOB): _____ Life Wireless Cell Phone # _____

I certify that I participate in at least one of the below 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) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> State Specific Program: _____
Print the name of the program |
| <input type="checkbox"/> National School Lunch Program's free lunch program | |

2) 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.

Check One: I understand the above and agree I do not agree

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

Check One: Correct Not Correct

4) The address listed on my original application is my primary residence, not a second home or business.

Check One: Correct Not Correct

5) If I move to a new address, I will provide my new address to Life Wireless within 30 days.

Check One: I understand the above and agree I do not agree

6) If I provided a temporary residential address to Life Wireless, I will verify my temporary residential address every 90 days.

Check One: I understand the above and agree I do not agree

7) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

Check One: I understand the above and agree I do not agree

8) 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.

Check One: I understand the above and agree I do not agree

9) The information contained in this certification form is true and correct to the best of my knowledge.

Check One: I understand the above and agree I do not agree

Signature: _____ Date: _____