

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: [BEGIN CONFIDENTIAL] Telrite has responded fully to a December 2011 FCC Enforcement Bureau inquiry regarding rogue agent actions in Missouri. While the investigation has not been formally closed, Telrite has provided FCC staff with all requested information, including information demonstrating that Telrite has restored all subsidies to the federal universal service fund attributable to apparently fraudulent rogue agent activity and further demonstrating that Telrite has reformed and refined its policies, procedures and training to guard against recurrence of such activity in the future. [END CONFIDENTIAL]

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.

[BEGIN CONFIDENTIAL] In May of 2013, Telrite was one of the many ETCs who received an FCC Enforcement Bureau inquiry regarding intra-company duplicates detected as a result of USAC's 2012 in-depth validation process for scrubbing duplicates in advance of the FCC's National Lifeline Accountability Database coming on line. Telrite has responded fully to the inquiry indicating that it would restore Lifeline reimbursements to USAC for any intra-company duplicates detected by USAC's advanced screening process that were not captured by Telrite's screening process. Telrite also explained how it had enhanced its intra-company duplicate detection process by reverse engineering USAC's process in order to capture duplicates that were not previously captured due to minor differences in name and or address entries. While Telrite's duplicate screening process had been more than 99% effective, these latest enhancements make it closer to 100% effective. [END CONFIDENTIAL]