

**BEFORE THE
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Telrite Corporation d/b/a Life Wireless)	
Petition for Designation as an)	D.T.C. 13-1
Eligible Telecommunications Carrier)	
in the Commonwealth of Massachusetts)	

**RESPONSE OF TELRITE CORPORATION D/B/A LIFE WIRELESS
TO SECOND SET OF INFORMATION REQUESTS ISSUED BY THE PRESIDING OFFICER**

D.T.C. 2-1 Refer to updated Attachments 7 and 8. Provide the ‘device unlocking’ policy referred to at the end of each of the attachments.

Response: Attached (as Att. 1) is the Company’s ‘device unlocking’ policy, as currently in place. Telrite expects this policy to apply for its Massachusetts Lifeline operations.

Respondent: Barton DeHaven, Jr., Field Operations Manager

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D.T.C. 2-2 Refer to updated D.T.C. 1-24. Explain how Telrite informs customers of international service limitations and provide any proposed marketing material disclosing the limitation on international calling.

Response: Telrite does not advertise the availability of international calling and instead specifies that the service includes “Nationwide Calling” and “No charge for domestic long-distance calls” under “WHAT DOES LIFE WIRELESS SERVICE INCLUDE?” at <https://www.lifewireless.com/plans>. Telrite is amenable to adding the following disclosure to its plan page: “Life Wireless plans do not include international calling.”

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D.T.C. 2-3 Refer to updated D.T.C. 1-36. Describe Telrite's second layer of internal review, including any additional data sources used to verify Lifeline customers.

Response: Upon receiving an application for Telrite's Lifeline service, Telrite validates and normalizes the address provided via the MELISSA database and checks the address against the U.S. Postal Service system. The system then confirms the applicant's identity via Lexis Nexis (using the prospective customer's last name, date of birth and the last four digits of the applicant's Social Security number). After that, the name, address, date of birth and last four digits of the Social Security number are entered into Telrite's internal database to ensure that Lifeline-supported service is not provided to an internal duplicate account or to an address duplicate without a valid one-per-household form acknowledging that the address is shared with other households. All applicants must pass National Verifier and National Lifeline Accountability Database screens before successful enrollment in the Lifeline program.

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D.T.C. 2-4 Refer to updated D.T.C. 1-39. Describe how AT&T's proposed 3G network retirement will affect Telrite customers. Provide any plans Telrite has to communicate with those customers about the retirement and any plans to provide customers with devices that will be compatible with AT&T's network post-retirement.

Response: AT&T's 3G network retirement will not affect Telrite customers in Massachusetts because Telrite plans on distributing only 4G-LTE compatible phones in Massachusetts.

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D.T.C. 2-5 Refer to updated D.T.C. 1-31, 47 U.S.C. § 214(e)(1)(B), and 47 C.F.R. § 54.201(d)(2). Explain whether Telrite considers social media “media of general distribution” and why.

Response: Telrite considers social media to be media of general distribution. Social media platforms (e.g., Facebook) have extensive reach and are more likely to reach low-income consumers than traditional media of general distribution such as newspapers.

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D.T.C. 2-6 Refer to updated D.T.C. 1-3 and updated Attachment 2(b). Describe how Telrite has complied with the Nebraska Public Service Commission (“NPSC”) directives since the settlement between Telrite and the NPSC. Please also provide any update regarding any disputes between Telrite and the NPSC since the settlement agreement.

Response: Since entering into the stipulation, Telrite has met the commitments set forth therein, including compliance with NPSC requirements. Nebraska has since been incorporated into the National Verifier. Telrite has not had any disputes with the NPSC since entering into the settlement agreement.

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D.T.C. 2-7 Provide any updates regarding Telrite's petition to be a Lifeline-only ETC in New Jersey.

Response: Telrite's New Jersey petition for designation remains pending. The Board of Public Utilities (BPU) Staff issued a second data request in mid-November 2021 to which Telrite promptly responded. The Company is following up with BPU Staff to ascertain whether Staff has any further questions and when the Board is expected to act upon the Company's petition.

Respondent: Barton DeHaven, Jr., Field Operations Manager



(<https://www.lifewireless.com>).

LIFE WIRELESS MOBILE DEVICE UNLOCKING POLICY

Life Wireless complies with point number twelve of the CTIA Consumer Code with respect to the unlocking of mobile phones. Specifically, Life Wireless adheres to the following principles regarding the ability of customers and former customers, and individual owners of eligible devices, to unlock phones that are locked by or at the direction of Life Wireless.

- (1) Life Wireless will post on its website a clear, concise, and readily accessible policy on mobile wireless device unlocking.
- (2) As a prepaid provider, Life Wireless will, upon request, unlock Life Wireless mobile phones no later than *one year* after initial activation, for customers that are in full compliance with Life Wireless' Terms of Service.
- (3) Life Wireless will, within two days of receiving an unlocking request, do one of the following: (i) unlock an eligible phone; (ii) initiate a request to the original equipment manufacturer to unlock an eligible phone; (iii) explain to the requesting customer why the phone is ineligible for unlocking; or (iv) offer a reasonable explanation as to why Life Wireless needs more time to process the unlocking request.
- (4) For deployed military personnel who are in full compliance with Life Wireless' Terms of Service, Life Wireless will unlock mobile phones on receiving valid copies of deployment papers.

Note that devices that work on Life Wireless' network may not be compatible with other carriers' networks due to the use of different frequencies and technologies to provide wireless network access. "Unlocking," as used herein, refers only to disabling of software prevents the activation of a device designed for Life Wireless' network from being used on another carrier's technologically-compatible network, does not pertain to hardware changes, and does not guarantee that the Life Wireless phone will be compatible with any particular carrier's network or that all functionality of the device can be enabled on any other network.

[Distributor \(/ap/\)](#)[Contact Us \(https://www.lifewireless.com/contactus\)](https://www.lifewireless.com/contactus)

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[Site Map \(https://www.lifewireless.com/sitemap\)](https://www.lifewireless.com/sitemap), |

[California Notice at Collection \(https://www.lifewireless.com/CA/collection\)](https://www.lifewireless.com/CA/collection), |

[Device Unlocking Policy \(https://www.lifewireless.com/unlocking\)](https://www.lifewireless.com/unlocking), |

[Return Policy \(https://www.lifewireless.com/returns\)](https://www.lifewireless.com/returns).

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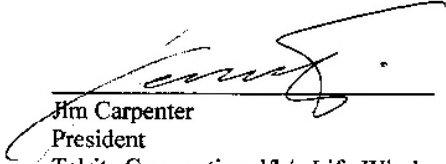
[_ \(http://www.twitter.com/lifewireless\)](http://www.twitter.com/lifewireless)

To obtain Life Wireless service potential subscribers must meet certain eligibility requirements such as receiving governmental assistance or a household income that is 135% or below Federal Poverty guidelines for a household of that size, or the percentage guideline for your state. The specifics of what determines a potential subscriber's eligibility are specific to each state. Life Wireless service is limited to one per household, and cannot be combined with any other Lifeline offering.

Verification

STATE OF GEORGIA §
 §
COUNTY OF NEWTON §

I, Jim Carpenter, state that I am the President of Telrite Corporation d/b/a Life Wireless ("Telrite"); that I am authorized to make this Verification on behalf of Telrite; that I have read the foregoing document; and that the statements in the foregoing document with respect to Telrite are true, accurate and correct to the best of my knowledge, information and belief. I declare under penalty of perjury that the foregoing is true and correct.



Jim Carpenter
President
Telrite Corporation d/b/a Life Wireless
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all persons in the attached service list, compiled by the Secretary of the Department in this proceeding to include all parties of record, in accordance with the requirements of 207 C.M.R. 1.05(I) of the Department's Procedural Rules.

/s/ John J. Heitmann

John J. Heitmann

February 28, 2022



COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 13-1 Service List

**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)**

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