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**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 THIRD SET OF INFORMATION REQUESTS BY THE DEPARTMENT OF
TELECOMMUNICATIONS AND CABLE**

Telrite Corporation d/b/a Life Wireless (“Telrite”) provides the following responses to the Third Set of Information Requests by the Department of Telecommunications and Cable issued on November 11, 2022.

D.T.C. 3-1 Please identify each and provide examples of advertising from each social media platform Telrite intends to use for Lifeline advertising in Massachusetts.

Respondent: Barton DeHaven, Jr., Field Operations Manager

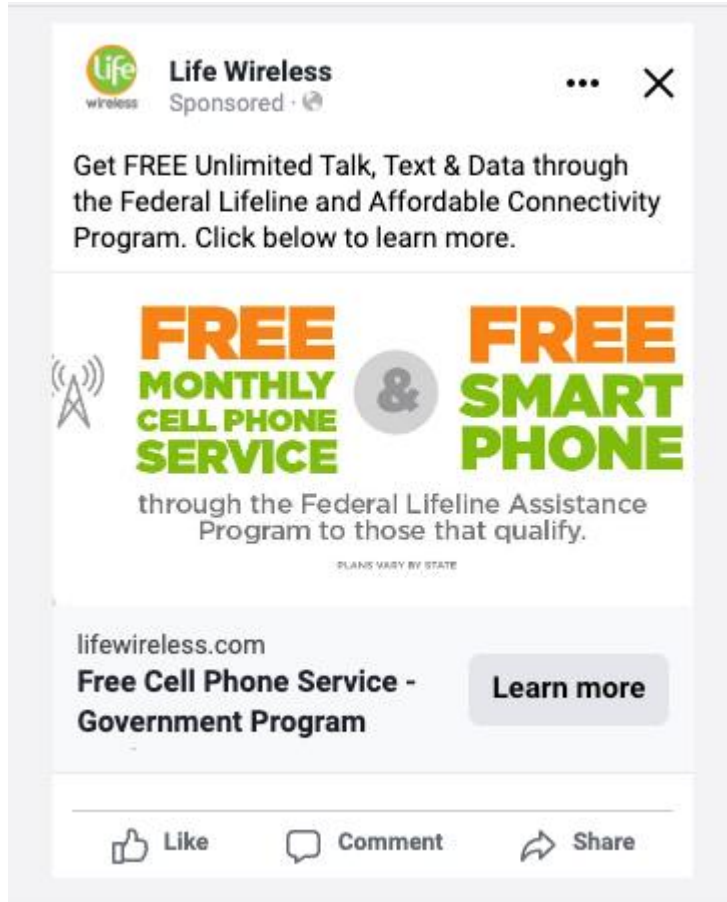
Response

Please see the following examples of advertising materials identified by type of media.


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MAIN FACEBOOK ADVERTISEMENT






The image is a screenshot of a Facebook advertisement for Life Wireless. At the top left is the Life Wireless logo, which consists of a green circle with the word "Life" in white and "wireless" in smaller green text below it. To the right of the logo, the text "Life Wireless" is displayed in a bold, black font, followed by "Sponsored" and a small globe icon. In the top right corner of the ad, there are three dots and a close button (an 'X' icon). Below the header, the main text reads: "Get FREE Unlimited Talk, Text & Data through the Federal Lifeline and Affordable Connectivity Program. Click below to learn more." This text is in a standard black font. The center of the ad features a large graphic with the words "FREE MONTHLY CELL PHONE SERVICE" in orange and green, followed by a large ampersand "&" in a grey circle, and then "FREE SMART PHONE" in orange and green. Below this graphic, it says "through the Federal Lifeline Assistance Program to those that qualify." in a smaller black font, with "PLANS VARY BY STATE" in very small text underneath. At the bottom of the ad, the website "lifewireless.com" is listed. Below that, the text "Free Cell Phone Service - Government Program" is shown in bold. To the right of this text is a grey button with the words "Learn more" in white. At the very bottom of the ad, there are three icons: a thumbs-up for "Like", a speech bubble for "Comment", and a share icon for "Share".

Life Wireless
Sponsored · 

Get FREE Unlimited Talk, Text & Data through the Federal Lifeline and Affordable Connectivity Program. Click below to learn more.

FREE MONTHLY CELL PHONE SERVICE & **FREE SMART PHONE**
through the Federal Lifeline Assistance Program to those that qualify.
PLANS VARY BY STATE

lifewireless.com
Free Cell Phone Service - Government Program [Learn more](#)

 Like  Comment  Share

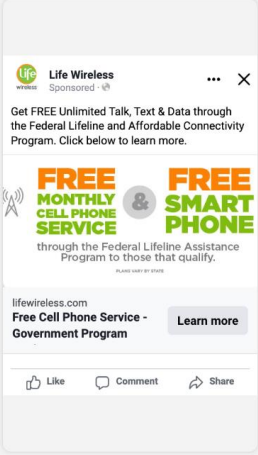
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**FACEBOOK FEEDS, MARKETPLACE, VIDEO FEEDS, RIGHT COLUMN
ADVERTISEMENTS**

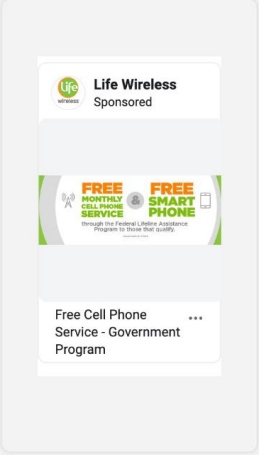
Feeds

Facebook Feeds



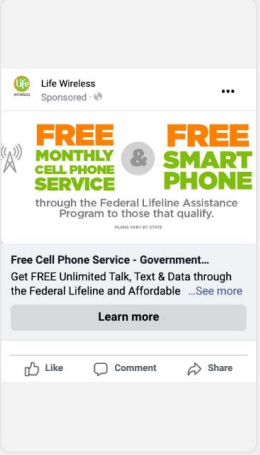
See variations

Facebook Marketplace



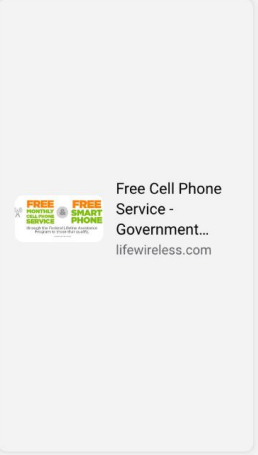
See variations

Facebook Video feeds



See variations

Facebook Right column




See variations

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FACEBOOK MESSENGER, BUSINESS EXPLORE ADVERTISEMENTS

 **Messenger**
Inbox


Ad view


Expanded view

 **Life Wireless** Ad
Free Cell Phone Service - ...
[View more](#)



See variations


 **Facebook**
Business explore

 **Life Wireless**
Sponsored ·

...

×

Get FREE Unlimited Talk, Text & Data through the Federal Lifeline and Affordable Connectivity Program. Click below to learn more.

 **FREE MONTHLY CELL PHONE SERVICE**

&


FREE SMART PHONE


through the Federal Lifeline Assistance Program to those that qualify.


PLANS VARY BY STATE

[lifewireless.com](#)
Free Cell Phone Service - Government Program

Learn more

 Like

 Comment

 Share

See variations

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D.T.C. 3-2 Please provide complete and detailed documentation of Telrite's market research for Massachusetts, including but not limited to any underserved groups or areas Telrite has identified and intends to target in Massachusetts.

Respondent: Barton DeHaven, Jr., Field Operations Manager

Response

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D.T.C. 3-3 Please explain how Telrite’s marketing strategy reaches underserved groups in Massachusetts.

Respondent: Barton DeHaven, Jr., Field Operations Manager

Response

All advertising and outreach materials will direct consumers to the Telrite website where they may complete an online application or call Company at the following telephone number: 1-888-543-3620. Telrite will engage in the following advertising and outreach activities to reach underserved groups in Massachusetts:

Governmental Agencies

Telrite will coordinate its outreach efforts with and provide advertising materials to governmental agencies and other organizations that administer relevant governmental assistance programs and cater to those likely to qualify for support. Currently, the Company's advertising plans call for it to coordinate advertising and outreach efforts with organizations such as the following: social service agencies; community centers; local Council on Aging centers; the United Way; and AARP.

Internet Marketing

Telrite currently intends to market its Lifeline service via the Internet through the following methods in Massachusetts, using banners and email: Google Ad words & Bing; targeted email lists; affiliate marketing; crosslinks with Community Based Organizations; social media; and lead generation.

Print Media

Telrite intends to market its Lifeline service using local permissioned-based flyers and brochures displayed at partner venues to promote awareness of the availability of Lifeline service

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to this neglected consumer segment. For example, flyer and brochure distribution may be conducted at the following locations and/or with the following partners: local ground teams; retail partners; distribution partners; Company agents; and state and local social service agencies.

Site Events

Site events have long been Telrite's most successful marketing method and it anticipates conducting site events in Massachusetts. All site events are required to meet the following uniform standards: 5 foot by 5 foot custom printed tent with frame; 3-foot custom printed fitted table cover; Federal Communications Commission required signage; and laminated state Lifeline application form; and any required state-specific signs. Telrite will use population statistics to determine the best locations for site events to find underserved qualifying potential subscribers and to schedule the amount of time each site event will last.

Telrite also intends to market its Lifeline service using traditional print flyers and brochures displayed at local site and temporary locations, as well as partner venues, to promote awareness of the availability of Lifeline service to the neglected consumer segment.

Additional Marketing

Telrite will explore other marketing opportunities in Massachusetts. Such opportunities traditionally include print, outdoor, electronic and broadcast media. Telrite also will research media costs for additional advertising beyond general marketing efforts and will consider additional and emerging media on an individual basis, based on all associated media costs in each major market.

The Company may also utilize some direct marketing efforts to target audiences that are likely to be eligible to participate in the Lifeline program. Specifically, Telrite is considering use

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of a neighborhood outreach sales model that will employ temporary tents in locations throughout the communities that the Lifeline program is designed to benefit. Based on its experience in other states, Telrite had found that community outreach represents more than 99 percent of Telrite's in-person customer enrollment, as opposed to over-the-phone or online enrollments. Telrite expects the same will be true for Massachusetts if this form of direct marketing is able to be employed. Neighborhood outreach locations and associated events are scheduled using various market and industry data resources. Telrite directs a team of representatives that survey and evaluate potential event locations across its service areas. Additionally, Telrite partners with community organizations and governmental agencies and hopes to do the same in Massachusetts. Organizations with which Telrite would partner are those that administer any of the relevant government assistance programs such as nursing homes, churches and food banks.

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D.T.C. 3-4 Please provide additional reasons as to why designating Telrite as an ETC in Massachusetts is in the public interest.

Respondent: Barton DeHaven, Jr., Field Operations Manager

Response

As Telrite described in its Petition, the overarching purpose of the Lifeline program is to ensure that low-income consumers have access to and can afford essential voice and broadband communications services. Designation of Telrite, an experienced ETC, will directly advance the goals of the Lifeline program in Massachusetts by providing low-income residents with an additional competitive option. In Massachusetts, the Lifeline participation rate of Lifeline-eligible households is only 13 percent. *See* Program Data, Lifeline Participation Rate, at <https://www.usac.org/lifeline/resources/program-data/#Participation>. This low participation rate places Massachusetts in the bottom 20 percent nationwide. Furthermore, during the third quarter of 2022, there were only three wireless ETCs that received Lifeline support for providing services to Massachusetts households. *See* FCC Filings, 2023 – First Quarter Filings, LI04-Qtrly-Low-Income-Disbursement-Amts-by-Company-3Q2022.xls, at <https://www.usac.org/about/reports-orders-fcc-filings/#results>. Designation of Telrite as an ETC will provide additional competition within the Lifeline market thereby helping to improve the rate of program participation by eligible subscribers and spurring other ETCs to improve their own Lifeline service offerings.

Moreover, as explained in the Response to D.T.C. 3-3, Telrite has an extensive, multi-pronged marketing plan that includes online and print advertising, coordination with government agencies that interact with low-income consumers who are eligible for Lifeline service and conducting outreach events in neighborhoods where eligible low-income consumers reside. In

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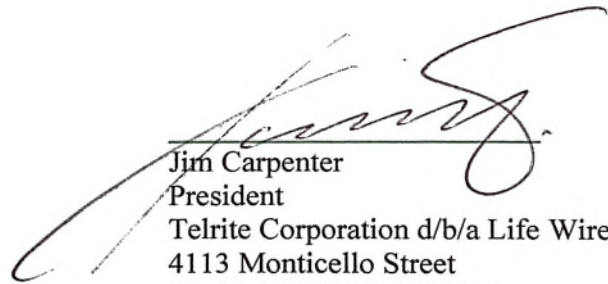
addition, Telrite's underlying carrier is AT&T Mobility. Telrite understands that it would be the only wireless ETC that relies on AT&T Mobility's network, thereby enabling it to reach consumers that reside in areas that are best served by AT&T Mobility's network. Indeed, without Telrite's participation in the Lifeline service market in Massachusetts, there would be gaps in coverage that cannot be addressed by existing ETCs. Telrite's sophisticated marketing strategy, together with its access to the high-quality wireless network of its underlying carrier, will facilitate greater participation by Massachusetts low-income households who are entitled to the essential assistance the Lifeline program provides.

Based on the foregoing, as well as for the reasons stated in the Petition, designating Telrite as an ETC in Massachusetts is in the public interest.

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.



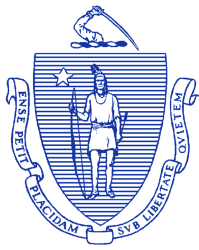
Jim Carpenter
President
Telrite Corporation d/b/a Life Wireless
4113 Monticello Street
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CERTIFICATE OF SERVICE

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/ Genya Meharg
Genya Meharg

December 2, 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**

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