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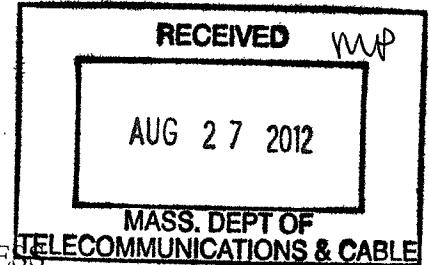
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August 24, 2012

VIA OVERNIGHT DELIVERY

Catrice Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118
(617) 305-3580



Re: Global Connection Inc. of America d/b/a STAND UP WIRELESS
D.T.C 11-11

Dear Ms. Williams:

Enclosed please find an original and three (3) copies of Global Connection Inc. of America d/b/a STAND UP WIRELESS' responses to the Department's second request for information, along with a Motion for Protective Order of Non-Disclosure.

ENCLOSED PLEASE FIND ONE COPY OF THE COMPANY'S RESPONSES TO D.T.C. 2-11 (a)-(b), D.T.C. 2-13, D.T.C. 2-14 (a)-(d), AND EXHIBITS 3, 4 (partial), 5 AND 7 IN A SEPARATE SEALED ENVELOPE MARKED "CONFIDENTIAL AND PROPRIETARY." RESPONSES TO D.T.C. 2-11 (a)-(b), D.T.C. 2-13, D.T.C. 2-14 (a)-(d), AND EXHIBITS 3, 5 AND 7 CONTAIN PROPRIETARY INFORMATION AND APPLICANT HEREBY REQUESTS CONFIDENTIAL TREATMENT OF THE ENCLOSED INFORMATION. PUBLIC DISCLOSURE OF THE INFORMATION COULD PLACE APPLICANT AT A COMPETITIVE DISADVANTAGE. APPLICANT EXPECTS THAT THIS INFORMATION WILL BE RESTRICTED TO COUNSEL, AGENTS AND EMPLOYEES WHO ARE SPECIFICALLY ASSIGNED TO THIS APPLICATION BY THE COMMISSION.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Please acknowledge receipt of this filing by returning the duplicate copy of this letter in the enclosed, self-addressed envelope. Thank you.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for Global Connection Inc. of America
d/b/a STAND UP WIRELESS

Enclosures

cc: Dave Skogen
D.T.C. 11-11 Service List

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

Petition of Global Connection Inc. of America)
d/b/a STAND UP WIRELESS for Designation) D.T.C. 11-11
as an Eligible Telecommunications Carrier)

MOTION FOR NON-DISCLOSURE OF CONFIDENTIAL INFORMATION

Global Connection Inc. of America d/b/a STAND UP WIRELESS hereafter ("Stand Up Wireless") hereby moves the Department of Telecommunications and Cable ("the Department") to grant its Motion for Non-disclosure of Confidential Information ("Motion") precluding public disclosure of certain proprietary, competitively sensitive confidential information contained in Stand Up Wireless' concurrently filed Responses to the Second Set of Information Requests of the Department of Telecommunications and Cable. Additionally, Stand Up Wireless requests that the Department issue an Order under which it agrees to accept and maintain the confidentiality of such further confidential information as may be identified and submitted by Stand Up Wireless in response to subsequent information requests, record requests tendered at the September 20, 2012 hearing to be held in this docket, or as part of Stand Up Wireless' continuing obligations to supplement discovery responses. Stand Up Wireless requests the Department grant its Motion for those reasons provided below, and in accordance with Massachusetts G.L. ch. 25C § 5:

1. The information that Stand Up Wireless seeks to protect in the Responses is the information submitted in Exhibit 3, Exhibit 4 (partial), Exhibit 5, Exhibit 7 and responses to D.T.C. 2-11 (a)-(b), D.T.C. 2-13, and D.T.C. 2-14 (a)-(d) (collectively the "Protected Information"). The Protected Information consists of a description of the company's employee training materials, financial information, actual and planned advertising expenditures, and customer count and revenues. The Protected Information was marked with the words "CONFIDENTIAL AND PROPRIETARY" and enclosed in a separate sealed envelope marked with the words

“CONFIDENTIAL AND PROPRIETARY”.

2. Stand Up Wireless respectfully requests that the Protected Information (and any reproduction or copying of any part thereof) be restricted to counsel, and other agents or employees, who have been specifically assigned to this proceeding by the Department; that the Protected Information be used solely in connection with this proceeding; that the Protected Information used in depositions, prepared testimony or other similar uses will be redacted and submitted under seal; that all Protected Information should be marked "CONFIDENTIAL AND PROPRIETARY" prior to delivery; that neither the filing of the Protected Information in this proceeding, nor the furnishing of the Protected Information for review by Department ("Staff") shall be considered a waiver of any right to object upon any ground to the use of introduction into evidence during any proceeding of any Protected Information; and that not later than thirty (30) days following the conclusion of this proceeding by issuance of a final, non-appealable order of this Department, all Protected Information designed as "CONFIDENTIAL AND PROPRIETARY" including all copies in whole or in part thereof, should be returned to Stand Up Wireless.

3. As grounds for this Motion, Stand Up Wireless states:

(a) Stand Up Wireless seeks confidential treatment for any responses that constitute or contain proprietary information, confidential business information, or trade secrets.

(b) Stand Up Wireless seeks confidentiality for proprietary information, confidential business information, or trade secrets that are not publicly available and regarding which, the release of such this information would be competitively disadvantageous to Stand Up Wireless.

(c) Stand Up Wireless seeks confidentiality for any information identified by Stand Up Wireless that is only available to a limited number of Stand Up Wireless personnel, and over which Stand Up Wireless employs its best efforts to maintain the secrecy of the information.

(d) Stand Up Wireless seeks confidentiality for any information identified by

Stand Up Wireless that is not generally available outside the company, other than by order or request of a judicial or regulatory body or in the course of the discovery process in a hearing or trial, but then only to the extent that the discovery of the information is subject to a non-disclosure agreement or protective order.

(e) Stand Up Wireless seeks confidentiality for any information identified by Stand Up Wireless that contains commercial information that derives actual and potential independent economic value from not being known to, and not being ascertainable by proper means by, persons who can obtain economic value from its disclosure and use.

(f) Stand Up Wireless seeks confidentiality for any information identified by Stand Up Wireless regarding which no public interest would be served by the disclosure of the information submitted.

(g) Release of data regarding customer counts, network design, product plans, marketing plans, infrastructure plans, business plans, financial statements, product development, strategic plans, and the like could have serious and injurious consequences as it would uniquely situate any competing carrier to focus its marketing, business or network construction plans to target its competitor's customer base. Competitive harm could also occur insofar as carriers might concentrate their services in insular patterns, whether geographic, technological, commercial or otherwise. Such actions would result in a degradation of service outside the areas of concentration, delay in further or future deployment, duplication of service offerings, and reduce pressure for price competition. These results are clearly undesirable, but entirely likely to occur as a result of any release confidential data provided to the Department by Stand Up Wireless.

WHEREFORE, Global Connection Inc. of America d/b/a STAND UP WIRELESS requests that the Department enter an order granting Stand Up Wireless' motion for confidential treatment to protect the identified submitted information, requiring Staff to treat the Protected Information in the manner described herein, and issue a Protective Order to ensure the

confidentiality and facilitate the submission of confidential information in response to such further information and data requests as may be made by the Department in the instant docket.

Respectfully submitted,

Global Connection Inc. of America
d/b/a STAND UP WIRELESS

By: 

Lance J.M. Steinhart, Esq.
Lance J.M. Steinhart, P.C.
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005
(770) 232-9200

Dated: August 24, 2012

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO GLOBAL CONNECTION INC. OF AMERICA d/b/a STAND UP WIRELESS
D.T.C. 11-11
August 24, 2012

D.T.C. 2-1 Identify the methods through which Stand Up Wireless receives customer complaints, including whether it provides a toll-free telephone number for such complaints. State how Stand Up Wireless's customers are informed of the methods through which they can contact Stand Up Wireless with complaints.

Response: **Global strives to satisfy all customer issues in a complete and timely manner. Customers call into the service center and are promptly answered. The account information is accessed real time and trained representatives attempt to answer any and all questions, respond to complaints, etc. Should the agent not be able to satisfy the customer an escalation process is put in place. If the complaint or stated issue cannot be resolved to the customer's satisfaction upon escalation, the customer will be advised that it may contact the DPU Consumer Division to assist in resolving Lifeline consumer service complaints (excluding rates and entry issues); the customer will be advised of the DPU's consumer complaint number (1-877-886-5066).**

Customer service contact information is included with written welcome materials, in a follow up text message, and on www.StandUpWireless.com. Stand Up's Toll Free Number is 1-800-544-4441 and may also be accessed by dialing 611 on a Stand Up handset.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-2 Refer to pages 4 and 7, and Exhibit 3 of the Petition in which Stand Up Wireless states that "text messaging costs are typically much lower than voice minute costs," and that when customers purchase additional credits, "[e]ach credit provides one (1) minute of airtime or one (1) SMS text message."

- a. Explain in narrative form why the Stand Up 100 plan, which includes text messaging, offers only 200 total units (i.e. voice minutes and SMS text messages), while the Stand Up 250 plan, which offers only voice minutes and no text messaging, offers 250 units.
- b. State whether Stand Up Wireless is willing to increase its offering under the Stand Up 100 plan.

Response: a. **Stand Up Wireless offers customers choices of rate plans so that they may select the one that best fits their unique needs.**

The StandUP 100/100 plan offers customers a separate allotment of voice minutes (100 minutes) and SMS text messaging (100), both with the rollover feature. The rollover feature allows unused minutes and texts from the prior bill cycle to be used in the future if the monthly allotment is used prior to the end of a bill cycle (rolling 12 months). This plan is best suited for customers that do not anticipate using all their allocated monthly minutes and/or that utilize voice minutes and SMS in equal proportion.

The StandUP 250 plan offers customers 250 units of voice minutes and SMS text messages that can be used interchangeably. This plan does not offer the rollover feature. This plan is best suited for customers that prefer more than 100 voice minutes and/or 100 SMS text messages per month and have the control and flexibility of using them both interchangeably.

- b. **Stand Up believes that its current mix of phones and plans is very competitive but will continue to evaluate market conditions. In other markets, consumers have shown a preference for the rollover (100/100) plan versus the 250 plan.**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-3 Refer to page 5 of the Petition and page 20 of the Compliance Plan. Explain in narrative form why the Stand Up 250 plan in the Petition is different than the “250 anytime talk and text plan” in the Compliance Plan. Include in this response an explanation of why the “250 anytime talk and text plan” is included in the Compliance Plan, but not offered in the Petition.

Response: **These are referencing the same plan. The verbiage used in the petition and Compliance Plan are slightly different, but referencing the same plan.**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

D.T.C. 2-4 Refer to page 7 of the Petition in which Stand Up Wireless states that all Lifeline plans will include a free handset:

- a. Identify the types of handsets Stand Up Wireless intends to provide to Lifeline-subsidized customers, including whether the handsets are new or refurbished.
- b. State whether any of the handsets are capable of providing data service.

Response: a. Handsets include Qwerty keyboards and other advanced features. Currently the majority handsets provided by Stand Up Wireless are refurbished.

b. Yes.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 2-5 State whether Stand Up Wireless intends to offer data and/or Internet access, and describe how Stand Up Wireless intends to charge for such access, including any supplemental data plans.

Response: **While we do not currently offer data services, we may in the future as market conditions evolve. Pricing for such services has not been determined.**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
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D.T.C. 2-6 Stand Up Wireless's terms and conditions state that "StandUP customers shall have up to ninety (90) days from the activation date of their phone to return any defective phone to StandUP. StandUP will exchange a defective phone for a new or refurbished phone, at StandUP discretion, during this period of time only."

- a. Describe in narrative form what recourse, if any, Lifeline-subsidized customers have if their handsets cease to operate due to a defect after 90 days.
- b. If Stand Up Wireless does not provide Lifeline-subsidized customers with a free replacement phone for a defective one after 90 days, state the cost to the customer of a replacement phone. Also state how and when the cost of replacement is disclosed to the customer.

Response: a. Customers may receive a replacement handset shipped to them outside of the 90 day warranty period if they pay a replacement fee of \$30 which includes the cost of the handset, shipping and handling.

b. \$30. This information is available to the customer on our website www.standupwireless.com in our terms and conditions.

Response prepared by:
Dave Skogen, CEO
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-7 State whether Stand Up Wireless charges its Lifeline-subsidized customers an activation fee. If yes, identify the amount of the activation fee.

Response: **No, Stand Up Wireless does not charge its Lifeline-subsidized customers an activation fee.**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

D.T.C. 2-8 Provide a sample bill for a Stand Up Wireless Lifeline-subsidized customer in Massachusetts.

Response: **Stand Up Wireless is a prepaid wireless service provider and therefore does not issue bills to its customers. Customers may, however, view a copy of their account statement online; a sample statement is attached as Exhibit 1.**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
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D.T.C. 2-9 Provide a list of all services Stand Up Wireless offers to its wireless consumers. Describe the service in narrative form and identify the fee for the service. Include all other fees and penalties, and the reasons for them. Separate this list by categorizing all charges as either "recurring" or "non-recurring".

Response: **Stand Up Wireless customers will not be responsible for any non-recurring charges regardless of plan choice, and all plans come with a free handset, free customer care calls, and access to voicemail, caller ID, 3-way calling and call waiting at no additional charge.**

Stand Up Customers on a free monthly plan (i.e. StandUp 100 or StandUp 250) will receive their allotted amount of voice and text minutes with no recurring charges.

Customers that elect to apply their Lifeline discount to an alternate StandUp plan will receive the respective allotment of voice and text minutes and will be responsible for the monthly recurring charges consisting of the plan cost (retail less Lifeline discount) plus taxes and surcharges applicable per Massachusetts state law.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

D.T.C. 2-10 Refer to the customer application and certification attached as Exhibit 4 to Stand Up Wireless's Compliance Plan. Certify that Stand Up Wireless will revise the customer application and certification to comply with the Department's requirements.

Response: See attached certification. See also Exhibit 2 for the customer application and certification form that Stand Up Wireless has prepared for Massachusetts.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

- D.T.C. 2-11 Refer to page 15 and Exhibit 6 of the Petition in which Stand Up Wireless states that it will advertise the availability of its services using “many mediums for outreach including mass media, outreach events, and community and charitable involvement.” Provide, for each state in which Stand Up Wireless is currently a designated wireless ETC, the following:
- a. Stand Up Wireless’s annual advertising expenditures for the last three years.
 - b. Stand Up Wireless’s planned annual advertising budget for the current and next fiscal years.
 - c. Demonstrative examples (such as photographs, a URL, or a flyer) of a charitable or other event held at a church or local business as referenced in Stand Up Wireless’s response to D.T.C. 1-20(a) and on page 5 of the Compliance Plan.

Response: a. [BEGIN CONFIDENTIAL AND PROPRIETARY]

[END CONFIDENTIAL AND PROPRIETARY]

b. [BEGIN CONFIDENTIAL AND PROPRIETARY]

[END CONFIDENTIAL AND PROPRIETARY]

c. See attached Exhibit 3 which is CONFIDENTIAL AND PROPRIETARY

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

D.T.C. 2-12 For each type of media Stand Up Wireless has used for advertising its Lifeline service, provide a copy of an advertisement that was published or aired in each medium Stand Up Wireless identifies in the Petition. Include in this response the dates on which the advertisements were aired, published, or otherwise available for public viewing. Also, identify the name and location of each medium. Stand Up Wireless may respond to this Request in part by incorporating Exhibit 6 to the Petition by reference

Response: See attached Exhibit 4, a portion of which is being filed as **CONFIDENTIAL**.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

D.T.C. 2-13 Provide the projected first year advertising budget for Stand Up Wireless's Lifeline service in Massachusetts.

Response: [CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 11-11
August 24, 2012

D.T.C. 2-14 Provide the following:

- a. The number of wireless customers Stand Up Wireless serves nationally.
- b. The number of Lifeline-subsidized wireless customers Stand Up Wireless serves nationally.
- c. The average revenue of a wireless customer. Include in this calculation Lifeline support, non-recurring fees, and other sources of revenue such as hardware sales. Also, separately provide the all-revenue-inclusive, plan-specific average revenue per wireless customer for each wireless plan referenced in the Petition.
- d. The average annual number of account terminations for wireless Lifeline-subsidized customers and the reasons for the terminations. Include in this response customer-initiated cancellations.

Response: a. [CONFIDENTIAL AND PROPRIETARY]

b. [CONFIDENTIAL AND PROPRIETARY]

c. Average Monthly Revenue per Plan

[BEGIN CONFIDENTIAL AND PROPRIETARY]

[END CONFIDENTIAL AND PROPRIETARY]

d.

[CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Dave Skogen, CEO
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-15 State whether Stand Up Wireless permits third-party charges on customer invoices, including but not limited to “premium” text message services. If Stand Up Wireless permits such charges, state whether its customers are provided with the option to block third party charges.

Response: We do not permit “premium” text messages.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-16 Refer to the Notice the Department issued to Massachusetts ETCs on May 24, 2012. Certify that Stand Up Wireless will comply with the Notice if the Department grants its Petition.

Response: See attached certification.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-17 Certify that Stand Up Wireless will:

- a. Provide quarterly reporting to the Department of customer accounts terminated for inactivity.
- b. Provide quarterly reporting of consumer complaints to the Department regarding Stand Up Wireless's Lifeline-subsidized service;
- c. Participate in dispute resolution by the Department's Consumer Division for complaints from its Lifeline-subsidized customers;
- d. Provide quarterly reporting to the Department of USF support received for its Massachusetts customers;
- e. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline-subsidized customers.
- f. Notify the Department within 30 days of any and all future changes to Stand Up Wireless's rates, terms, or conditions;
- g. Include the Department's contact information for consumer complaints in Stand Up Wireless's marketing materials for its Lifeline-subsidized service; and
- h. Provide its customers with 911 and E911 access to each public safety answering point where Stand Up Wireless intends to provide Lifeline-subsidized service in Massachusetts.

Response: See attached certification.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
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D.T.C. 11-11
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D.T.C. 2-18 Provide a copy of the training materials referenced on page 5 of the Compliance Plan.

Response: See attached Exhibit 5.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
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D.T.C. 11-11
August 24, 2012

D.T.C. 2-19 Refer to page 6 of the Compliance Plan. Provide a copy of the “state-specific checklist[]” that Stand Up Wireless would use in Massachusetts.

Response: See attached Exhibit 6.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 2-20 StandUpWireless.com describes a “referral program,” offering 100 free minutes. State whether Stand Up Wireless will offer this referral program in Massachusetts. If yes, describe the program in detail in narrative form.

Response: **Yes. StandUP Wireless' referral program provides a customer with 100 additional voice minutes for each person they refer that is Lifeline eligible that becomes a StandUP Wireless customer. The referring customer contacts our Customer Care department with the name and phone number of the StandUP Wireless customer that they referred.**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 2-21 Provide Stand Up Wireless's financial statements for the last three years.

Response: See attached Exhibit 7, which is **CONFIDENTIAL AND PROPRIETARY**.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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D.T.C. 2-22 State whether Stand Up Wireless or its agents or third party contractors have ever offered telephones unsolicited to potential Lifeline customers.

Response: Neither Stand Up Wireless nor its agents or third party contractors have ever offered telephones unsolicited to potential Lifeline customers.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
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D.T.C. 2-23 List the safeguards, if any, that Stand Up Wireless has in place to prevent its agents and third party contractors from engaging in fraud and abuse, including those to prevent the unsolicited offering of telephones to potential Lifeline customers.

Response: Stand Up does not use agents or other third parties to acquire customers on any of its free plans due to fraud exposure.

Also, no reimbursement is sought until all appropriate information is collected from customer per our Compliance Plan.

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

AFFIDAVIT


State of Georgia)

County of Gwinnett)


I, Dave Skogen, being duly sworn upon oath, do hereby depose and state that I am employed by Global Connection Inc. of America d/b/a STAND UP WIRELESS ("Stand Up Wireless") as Chief Executive Officer. My business address is 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. I am authorized by Stand Up Wireless to make this Affidavit on its behalf, and it is given upon my personal knowledge. This Affidavit is given in support of its Petition to be designated as an Eligible Telecommunications Carrier ("ETC").

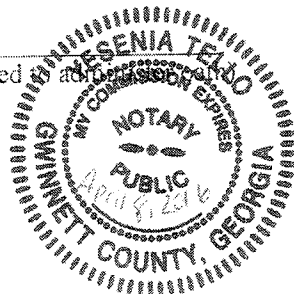
On behalf of Stand Up Wireless, I declare the following:

- A) Stand Up Wireless will revise its customer application and certification form to comply with the Massachusetts Department of Telecommunications and Cable's ("DTC") requirements;
- B) Stand Up Wireless will comply with the DTC's Notice issued to Massachusetts ETCs on May 24, 2012 if the DTC grants its ETC Petition;
- C) Stand Up Wireless will:
 - a. Provide quarterly reporting to the Department of customer accounts terminated for inactivity.
 - b. Provide quarterly reporting of consumer complaints to the Department regarding Stand Up Wireless's Lifeline-subsidized service;
 - c. Participate in dispute resolution by the Department's Consumer Division for complaints from its Lifeline-subsidized customers;
 - d. Provide quarterly reporting to the Department of USF support received for its Massachusetts customers;
 - e. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline-subsidized customers.
 - f. Notify the Department within 30 days of any and all future changes to Stand Up Wireless's rates, terms, or conditions;
 - g. Include the Department's contact information for consumer complaints in Stand Up Wireless's marketing materials for its Lifeline-subsidized service; and
 - h. Provide its customers with 911 and E911 access to each public safety answering point where Stand Up Wireless intends to provide Lifeline-subsidized service in Massachusetts.


Dave Skogen, Chief Executive Officer
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

Subscribed and sworn to before me,
this 23rd day of August 2012.


(Signature of person authorized to administer oaths)
(Notary Seal)
MA



RESPONSES TO SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO GLOBAL CONNECTION INC. OF AMERICA d/b/a STAND UP WIRELESS
D.T.C. 11-11
August 24, 2012

EXHIBIT 1 Sample customer account statement

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS



Due: Thu, Jul 19, 2012

Total: \$

Remit to:
Default

, 0000

Summary

Balance Information	
Previous Balance	0.00
Balance Forward	
New Charges	
Recurring Charges	12.75
Discounts	(12.75)
Total New Charges	
Total Amount Due	

Credits

Description	Start	End	Amount
Credit - Lifeline Subsidy Credit (USAC)	7/22/12	8/21/12	(9.25)
Credit - Company PROMO Credit	7/22/12	8/21/12	(3.50)
Subtotal			(\$12.75)

Recurring Charges

Number: [REDACTED]			
Description	Start	End	Amount
StandUP 100 Lifeline Plan	7/22/12	8/21/12	12.75
100 SMS Messages Monthly			
100 Voice Minutes Monthly			
Call Waiting			
Caller ID			
Nationwide Domestic Long Distance			
Voicemail			
Subtotal			\$12.75

Management Reports

Usage by Category			
Description	Calls	Minutes	Charge
Usage - LD - 800 - Interstate	1.00	1.00	
Usage - LD - Interstate	1.00	4.00	
Usage - Toll-Free	2.00	2.00	
Usage - Wireless - SMS	1.00	1.00	
	5.00	8.00	0.00

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EXHIBIT 2 Massachusetts Customer Application and Certification Form

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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

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

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

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

- | | | |
|---|--|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) | <input type="checkbox"/> Emergency Aid to Elderly, Disabled and Children (EAEDC) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> Transitional Aid to Families with Dependent Children (TAFDC) |
| <input type="checkbox"/> Medicaid | <input type="checkbox"/> National School Lunch Program's free lunch program | <input type="checkbox"/> MassHealth |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines | |

☐ **Tribal eligibility:** I hereby certify that I reside on Federally-recognized Tribal lands.

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) Address is (choose one): ☐ Permanent ☐ Temporary Contact Number _____

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

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

Number: _____ Apt: _____ Street: _____ City: _____ State: _____ Zip Code: _____

Multiple households sharing an 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 1.877.283.3890. **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 the box next to each line):

- ☐ 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 the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

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

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

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

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)

- ☐ National School Lunch Program's free lunch program
- ☐ Emergency Aid to Elderly, Disabled and Children (EAEDC)
- ☐ Transitional Aid to Families with Dependent Children (TAFDC)
- ☐ MassHealth

List B - Choose 1:

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

Applicant
Account
Number: _____

Agent/Dealer
Number: _____

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D.T.C. 11-11
August 24, 2012

EXHIBIT 3 Demonstrative example of event(s)
[CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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August 24, 2012

EXHIBIT 4 **Copies of advertisements**

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

Need FREE Wireless Service?

StandUP Wireless

Customers Receive for FREE!

100

ANYTIME
MINUTES

Every Month!

100
TEXT
MESSAGES

Every Month!

Includes:
FREE
CELL PHONE &
ACTIVATION

Includes:

- Long Distance
- Caller ID
- Call Waiting
- Voicemail



You May Be Eligible to Receive StandUP Wireless Service

if you participate in one of these government assistance programs:



• No Contract • No Credit Check • No Activation Fee

**CALL US
TODAY**

1.800.544.4441



IMPORTANT

LEAD BY WEATHER SERVICE INFORMATION

[illegible]

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[CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Dave Skogen, CEO
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EXHIBIT 5 Training Materials [CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
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EXHIBIT 6 State-specific checklist

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS

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

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,080
2	\$20,426
3	\$25,770
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

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

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

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

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EXHIBIT 7

Financial Statements [CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Dave Skogen, CEO
Global Connection Inc. of America
d/b/a STAND UP WIRELESS