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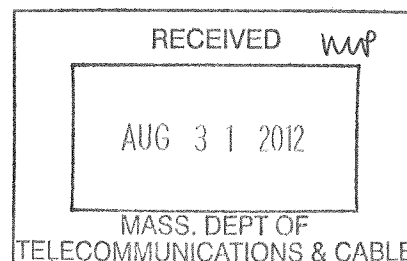
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August 30, 2012

VIA OVERNIGHT DELIVERY

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

Re: i-wireless, LLC
D.T.C 12-5




Dear Ms. Williams:

Enclosed please find an original and three (3) copies of i-wireless, LLC's responses to the Department's first request for information, along with a Motion for Non-Disclosure of Confidential Information.

ENCLOSED PLEASE FIND ONE COPY OF THE COMPANY'S RESPONSE TO D.T.C. 1-6 AND EXHIBIT 2 IN A SEPARATE SEALED ENVELOPE MARKED "CONFIDENTIAL AND PROPRIETARY." RESPONSES TO D.T.C. 1-6 AND EXHIBIT 2 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 i-wireless, LLC

Enclosures

cc: Nicki Wollenhaupt
D.T.C. 12-5 Service List

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

Petition of i-wireless, LLC for Designation) D.T.C. 12-5
as an Eligible Telecommunications Carrier)

MOTION FOR NON-DISCLOSURE OF CONFIDENTIAL INFORMATION

i-wireless, LLC hereafter ("i-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 i-wireless' concurrently filed Responses to the First Set of Information Requests of the Department of Telecommunications and Cable ("Responses"). Additionally, i-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 i-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 i-wireless' continuing obligations to supplement discovery responses. i-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 i-wireless seeks to protect in the Responses is the information submitted in Exhibit 2 and response to D.T.C. 1-6 (collectively the "Protected Information"). The Protected Information consists of a description of the company's customer count and financial information. 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. i-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 i-wireless.

3. As grounds for this Motion, i-wireless states:

(a) i-wireless seeks confidential treatment for any responses that constitute or contain proprietary information, confidential business information, or trade secrets.

(b) i-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 i-wireless.

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

(d) i-wireless seeks confidentiality for any information identified by i-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) i-wireless seeks confidentiality for any information identified by i-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) i-wireless seeks confidentiality for any information identified by i-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 i-wireless.

WHEREFORE, i-wireless, LLC requests that the Department enter an order granting i-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,

i-wireless, LLC

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 30, 2012

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-1 Identify by name and title, each executive officer and senior manager of i-wireless.

Response: Please see the organizational chart attached as Exhibit 1.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC

August 30, 2012

- D.T.C. 1-2 Provide a complete and detailed description of the corporate ownership structure of i-wireless, including, but not limited to:
- a. The identity and ownership stake of each member of i-wireless' ownership group;
 - b. The identity of all other telecommunications businesses that i-wireless' owners have interests in whether an ETC, CLEC, ILEC, wireless provider, or cable provider;
 - c. A complete and detailed list of all of i-wireless affiliates including all other names under which each entity does business;

Response:

- a. i-wireless is 50% owned by The Kroger Co. and 50% owned by Genie Global, Inc.**
- b. i-wireless' owners do not have interests in any other telecommunications or cable providers.**
- c. i-wireless does not have any telecommunications affiliates.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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August 30, 2012

D.T.C. 1-3 In each state which i-wireless or one of its affiliate is designated as an ETC, indicate whether that designation is limited, and if so how, including any specific requirements imposed on or volunteered by i-wireless or the affiliate. Provide complete and detailed documentation describing any such limitations or requirements.

Response: **i-wireless is designated as a Lifeline-only ETC in the following states:**

Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia (collectively the federal default states), Arkansas, Arizona, Colorado, Georgia, Indiana, Illinois, Kentucky, Louisiana, Maryland, Michigan, Missouri, Nevada, Ohio, South Carolina, Texas, Utah and West Virginia.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-4 Provide the financial statements of i-wireless for the last three years.

Response: **Please see attached Exhibit 2, which is being filed as confidential.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-5 State if any state has denied or granted a pending i-wireless ETC petition subsequent to the filing of this petition.

Response: **Since filing its petition in Massachusetts, i-wireless was granted ETC designation in the federal default states by the FCC (*See In the Matter of Federal-State Joint Board on Universal Service, i-wireless, LLC Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia*, WC Docket No. 09-197, Order, DA 12-934 (rel. June 13, 2012).**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC

August 30, 2012

D.T.C. 1-6 Indicate whether i-wireless or any of its affiliates is presently offering, or has previously offered service in Massachusetts. If so, describe the scope of such business, including geographic areas of operation, services offered, and total number of Massachusetts customers.

Response: i-wireless has been offering non-Lifeline retail wireless service in Massachusetts throughout the service area of its underlying carrier, Sprint, since 2008.

[CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-7 Certify whether i-wireless or any of its affiliates has any outstanding tax liabilities, or other late payments, or 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 explain the reasons for such arrears.

Response: **See attached certification. Other than current liabilities, i-wireless is unaware of any specific outstanding liabilities.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-8 Identify any and all ongoing litigation involving i-wireless or any of its affiliates in any jurisdiction. Provide the docket number and summary of the litigation for each matter identified.

Response: i-wireless is currently involved in litigation relating to a claim of unfair termination. The claim, case A-1200786, is filed with the Hamilton County Court in Ohio.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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August 30, 2012

D.T.C. 1-9 Certify whether the FCC, any state utilities commission, or government agency has, to date, rendered or entered a finding, criminal conviction (including plea agreements), or civil judgment against i-wireless, its executives or senior managers, or any of its affiliates during the last ten years. Provide a copy of any such findings, conviction, plea agreement, or civil judgment entered against i-wireless, its executives or senior managers, or its affiliates.

Response: **See attached certification. No findings, convictions, plea agreements, or civil judgments have been entered against i-wireless, its executives or senior managers, or any affiliates.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-10 Refer to monthly retail plans available to Lifeline eligible customers which includes 200 MB of data web browsing and email under i-wireless' \$25 per month plan. State whether customers of the plan will be able to use the 200 MB of data with a smartphone device. Also state if the free mobile handsets provided to i-wireless Lifeline customers have smartphone functionality.

Response: The free phone provided is not a smart phone but is data capable and can use the data services. i-wireless does offer smart phones which can be purchased and used in conjunction with Lifeline service

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC

August 30, 2012

D.T.C. 1-11 State whether i-wireless will impose an activation fee, change fee, or early termination fee, or any other service fee on any of its Lifeline customers. If yes, provide a detailed description of said fee(s).

Response: **i-wireless does not impose any activation fee, change fee, or early termination fee, or any other service fee on any of its Lifeline customers.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-12 Indicate whether there are any fees associated with the purchase of additional
airtime through either i-wireless' telephone customer interface or its internet
website.

Response: **Other than the cost of the additional airtime itself, there are no fees
associated with the purchase of additional airtime through either i-wireless'
telephone customer interface or its internet website.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-13 Referring to page 5 of the Petition, provide a detailed description of the domestic customer care group with whom i-wireless has contracted. Include in the description any contractual guarantees relative to maximum response times, hold times, or any other vital customer service metrics.

Response: For customer care i-wireless uses Sykes Enterprises, Incorporated, and has done so since the beginning of its business in 2006. i-wireless calls are handled by dedicated teams in 2 of their locations: Bismarck, ND; and Sterling, CO.

i-wireless' contract requires the following service metrics to be met:

- Service level of 80% (80% of all calls answered in less than 30 seconds)
- Less than 5% abandoned rate.
- Regular call monitoring for quality control

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-14 Referring to page 6 of the petition, indicate whether Lifeline customers will have free access to web-based account management tools.

Response: Web based account management is provided free of charge to all customers.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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August 30, 2012

D.T.C. 1-15 Indicate whether CGM, LLC, the Lifeline service bureau, has the ability to verify that applicants names or addresses are not already receiving a Lifeline subsidy from another ETC.

Response: **Yes, CGM, LLC has the ability to verify that applicants' names or addresses are not already receiving a Lifeline subsidy from another ETC which has agreed to share their data with CGM, LLC.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-16 Provide a coverage area map for i-wireless in Massachusetts with sufficient granularity to distinguish coverage at the wire-center level. State whether i-wireless would enroll customers whose physical address falls outside the coverage area of its underlying facilities-based provider.

Response: Due to the limitations of licensing agreements, i-wireless' underlying carrier is unable or unwilling to provide the Company with maps showing wire center detail. However, general maps depicting Sprint's coverage are available at <http://coverage.sprint.com>.

i-wireless' systems are zip-code based, and the Company employs minimum coverage requirements in order to consider an area in coverage. i-wireless would not enroll a Lifeline customer who, based on their physical address, would fall outside of Sprint's coverage area. All touch points, the web & customer service representatives will ensure coverage through a zip code look up process.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-17 Provide detailed information about the contracts that i-wireless has with its underlying facilities-based carrier. Include in this response, the length of their contractual relationship, whether there is an expiration date for this agreement, and what provisions for termination, if any, exist.

Response: i-wireless and Sprint entered into a wholesale services contract in May 2006, and that contract was renewed and extended upon Sprint becoming an investor in the Company in January 2011. The contract expires in January 2021, and includes only standard conditions for termination (material fraud and non-payment).

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-18 State how i-wireless intends to provide directory assistance and operator services to its Lifeline customers.

Response: **i-wireless provides directory assistance and operator services to its customers through Sprint.**

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-19 Referring to page 20 of the Petition, explain in detail how i-wireless plans to bring a variety of rate plans into the reach of Lifeline customers that are comparable to those available to post-paid subscribers.

Response: i-wireless' Lifeline customers can choose from a variety of rate plans (two free plan options or any of i-wireless' retail rate plans at a discount) which include comparable features to those of post-paid wireless carriers – voice minutes, domestic long distance calling at no additional charge, text messaging, vertical features such as voicemail, call waiting and caller ID, and data capability. i-wireless' retail plans are priced competitively with those of post-paid wireless providers, but save the customer the burden of credit checks or service contracts.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-20 Certify that i-wireless will comply with the annual audit and reporting requirements outlined in *TracFone Wireless, Inc., Annual Verification of SafeLink Wireless Lifeline Subscribers*, D.T.C. 09-9, Order at 16 (June 30, 2010); and *TracFone Wireless, Inc., Annual Verification of SafeLink Wireless Lifeline Subscribers*, D.T.C. 10-6, Order at 4 (Oct. 19, 2010).

Response: i-wireless will comply with the annual audit and reporting requirements as recently revised by the FCC's Lifeline Reform Order (FCC 12-11) and codified in 47 C.F.R. § 54.410(f), which requires that i-wireless annually re-certify the eligibility of each of its Lifeline subscribers. i-wireless is required to report the results of its audit to USAC by January 31 of each year. i-wireless will likewise provide to the Commission on an annual basis a report detailing the results of the audit relating to its Massachusetts customers.

As part of its report to the Commission, i-wireless will classify its de-enrolled subscribers as follows:

- a) Subscriber Initiated (Voluntary Removal)
- b) No Longer Eligible (Renewal Failure)
- c) Duplicate Service / Fraud (Denied)
- d) No Longer Eligible (Due to non-usage policy)
- e) Other

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

D.T.C. 1-21 State whether i-wireless will notify the Department and receive Department approval before modifying its Massachusetts Lifeline service offerings.

Response: i-wireless will notify the Department before decreasing the value of its Massachusetts Lifeline service offerings at least 30 days in advance of implementation of the changes, to allow ample time for Department approval. However, i-wireless requests that it be permitted to implement changes which increase the value to the customer without or prior to Department notification or approval, so that benefits to customers are not delayed.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

- D.T.C. 1-29 State whether i-wireless will abide by the following Department conditions contained in *In the Matter of the Application of Virgin Mobile USA, L.P.'s Petition for Limited Designation as an Eligible Telecommunications Carrier*, D.T.C. 10-11, Order Approving Petition (Sept. 9, 2011). If not, state the reasons for its refusal.
- a. Provide quarterly reporting to the Department of customer accounts terminated for inactivity.
 - b. Provide reporting of consumer complaints to the Department regarding its Lifeline service and agree to participate in dispute resolution by the Department's Consumer Division.
 - c. Provide reporting to the Department of Universal Service Fund ("USF") support received for Massachusetts consumers.
 - d. File with the Department, within 60 days of the approval of its Petition, its terms and conditions of service, applicable to qualifying Lifeline service customers. Agree to an ongoing obligation to notify the Department of any future changes to its rates, terms, or conditions.
 - e. Include the Department's contact information for consumer complaints in its marketing materials for its Lifeline service.
 - f. Provide Public Safety Answering Points ("PSAP") self-certification to the Department.
 - g. Require all customers to contact i-wireless directly to self-certify, under penalty of perjury, that they qualify for Lifeline service and that the customer's household is not already receiving Lifeline service.
 - h. Implement a 60-day inactive account (non-use) policy whereby if a customer account is inactive for 60 days, i-wireless will suspend the collection of the USF support for the account during the pendency of a subsequent 30 day grace period during which i-wireless will attempt to re-engage the customer. In the event i-wireless cannot re-engage the customer, i-wireless will discontinue the customer's service so that it does not receive USF support for the grace-period.

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
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TO I-WIRELESS, LLC
August 30, 2012

Response: a. Yes.

b. Yes.

c. Yes.

d. Yes.

e. Yes.

f. i-wireless has attached as Exhibit 3 a letter from Sprint explaining how Sprint routes 911 calls from i-wireless' customers the same as it does for Sprint's own customers. Consistent with paragraph 383 of the Lifeline Reform Order¹, i-wireless is no longer required to follow the PSAP certification process.

g. Yes.

h. i-wireless will abide by its 60-day non-usage policy, which accords with 47 C.F.R. §§ 54.407(c)(2) and 54.405 (e)(3), as set forth below:

i-wireless will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period. i-wireless will provide the subscriber 30 days' notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be initiated after 30-days of non-usage.

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

AFFIDAVIT

State of Kentucky)

)

County of Campbell)

)

I, Paul McAleese, being duly sworn upon oath, do hereby depose and state that I am employed by i-wireless, LLC ("i-wireless") as Chief Executive Officer. My business address is 1 Levee Way, Suite 3104, Newport, Kentucky 41071. I am authorized by i-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 i-wireless, I declare the following:

- A) i-wireless is not aware of any outstanding tax liabilities, or other late payments, or liabilities due and owing to the Commonwealth of Massachusetts, or any government and/or quasi-public entities in any other jurisdictions;
- B) Neither the FCC nor any state utilities commission, or government agency has, to date, rendered or entered a finding, criminal conviction (including plea agreements), or civil judgment against i-wireless, its executives or senior managers, or any of its affiliates;



Paul McAleese, Chief Executive Officer
i-wireless, LLC

Subscribed and sworn to before me,
this 29th day of August 2012.

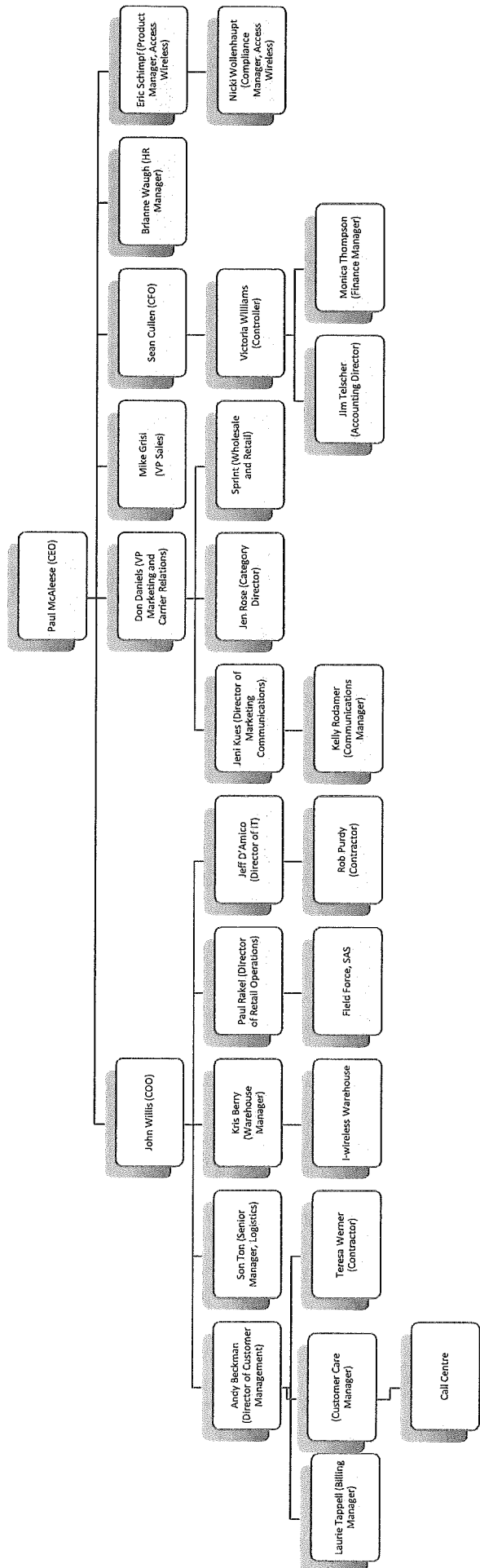
Neema Wollenhaupt
(Signature of person authorized to administer oath)
(Notary Seal)

MA

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
August 30, 2012

Exhibit 1 Organizational Chart

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC



RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO I-WIRELESS, LLC
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Exhibit 2 Financial Statements [CONFIDENTIAL AND PROPRIETARY]

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC

RESPONSES TO FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
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Exhibit 3 911 Certification from Sprint

Response prepared by:
Nicki Wollenhaupt
i-wireless, LLC