January 20, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC  20554

Re:  Ex Parte Communication: WC Docket No. 09-197

Dear Ms. Dortch:

i-wireless, LLC (“i-wireless” or the “Company”), by its undersigned counsel, hereby provides the supplemental information requested during the Company’s January 13, 2011 meeting with staff of the Wireline Competition Bureau’s Telecommunications Access Policy Division (“TAPD”). i-wireless requests that the Commission incorporate the supplemental information into its pending compliance plan and request for designation as an eligible telecommunications carrier (“ETC”) in the states of Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia (“ETC petition”).

I.  Status of State Applications

i-wireless has applications for ETC designation pending in the following states: Arizona, California, Colorado, Georgia, Indiana, Kansas, Kentucky, Michigan, Oregon, Utah and Washington. The Company has not yet been approved in any state, but anticipates approval within thirty days in Indiana and Michigan. As evidenced in attached Exhibit A, Oregon has placed the establishment of a procedural schedule on hold in i-wireless’ docket until the Company’s FCC compliance plan is approved. i-wireless also applied for ETC designation in Texas, but was required to withdraw its application and reapply upon approval of its FCC compliance plan.

II.  Description of Proposed Rate Plans

Please see attached Exhibit B for an updated description of i-wireless’ proposed Lifeline rate plans.
III. Annual Verification Process

In its compliance plan, i-wireless affirms that it will require all Lifeline customers to annually certify to i-wireless that they are the head of household and receive Lifeline service only from i-wireless. i-wireless will notify each Lifeline consumer prior to the service anniversary date that the customer must confirm his or her continued eligibility. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on record with i-wireless. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact i-wireless. Customers will have 60 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from i-wireless, and return the form to i-wireless by mail. Anyone who does not respond to the mailing and certify their continued eligibility will be removed from the Lifeline program.

Currently, customers will be required to complete the verification process by mail; however, i-wireless may offer additional options, such as web-based methods, in the future.

IV. ETC Designated Service Area

i-wireless hereby clarifies that its ETC petition seeks ETC designation on a statewide basis, with the exception of any area that would cover only a portion of a rural study area.

V. i-wireless’ Compliance Plan and ETC Petition Should Be Granted Without Further Delay

i-wireless submits that the supplemental information provided herein should remove any remaining impediments to prompt approval of the Company’s compliance plan and outstanding request for ETC designation. Swift action by the Commission on these long-standing requests will advance the program’s goals and serve the public interest. i-wireless respectfully requests approval of its pending compliance plan and ETC designation request without further delay.

Respectfully submitted,

/s/

Lance J.M. Steinhart
Attorney for i-wireless, LLC

cc: Pat McDonough
Trent Harkrader
Vickie Robinson
EXHIBIT A
Hello,

Per our conference call discussion earlier today, the procedural schedule for docket UM 1509 in which i-wireless seeks ETC designation in Oregon will be established after the FCC approves i-wireless' Compliance Plan.

Thanks,

Jon Cray, Program Manager
Residential Service Protection Fund
Public Utility Commission of Oregon
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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1509

In the Matter of the Application of
i-wireless, LLC,

For the Designation as an Eligible
Telecommunications Carrier in Oregon for
the Purpose of Offering Lifeline Service to
Qualified Households.

NOTICE OF TELEPHONE
PREHEARING CONFERENCE

The Public Utility Commission of Oregon will hold a telephone prehearing
conference in this proceeding as follows:

DATE: Friday, January 21, 2011
TIME: 10:00 a.m. (Pacific Time)
VIA DIAL-IN NUMBER: 503-945-7131
(if this is long distance to you, dial a“1”)

ADMINISTRATIVE
LAW JUDGE: Allan J. Arlow

The purpose of the prehearing conference will be to identify parties and
establish a procedural schedule. POSTPONEMENT will be made only upon a showing of
good cause. Please call the Administrative Hearings Division at (503) 378-3943 if you have
questions.

Dated this 10th day of January, 2011, at Salem, Oregon.

Ray Baum John Savage Susan K. Ackerman
Chairman Commissioner Commissioner

IF YOU HAVE A DISABILITY AND NEED ACCOMMODATION TO
PARTICIPATE IN THIS CONFERENCE, PLEASE LET US KNOW
(503) 378-6678 or Oregon Telecommunications Relay Service: 7-1-1
BEFORE THE
PUBLIC UTILITY COMMISSION OF TEXAS

In the Matter of
Application of i-wireless, LLC
for Designation as an Eligible Telecommunications
Carrier in the State of Texas for the Limited Purpose
of Offering Lifeline Service to Qualified Households

Docket No. 38725

NOTICE OF WITHDRAWAL

i-wireless, LLC ("i-wireless") hereby withdraws its above-captioned pending application for
designation as an Eligible Telecommunications Carrier ("ETC") in Texas, which was filed with the
Public Utility Commission of Texas ("Commission") on September 24, 2010. i-wireless states the
following as the basis for the withdrawal of its ETC application.

On June 25, 2010, the Federal Communications Commission ("FCC") granted i-wireless
forbearance from the facilities requirement of Section 214(e) for the purpose of seeking ETC
designation to provide Lifeline support only. Within thirty days of the release of the Order, i-wireless
was required to file a compliance plan outlining the measures it would take to implement the
conditions imposed by the FCC in its grant of forbearance.\(^1\) i-wireless understands that Commission
Staff requires FCC approval of i-wireless’ compliance plan before the Commission will approve i-
wireless as an ETC in the State of Texas. i-wireless plans to file an updated ETC application with the
Commission once its compliance plan has been approved by the FCC.

\(^1\) See Federal-State Joint Board on Universal Service; In the Matter of i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A),
For the reasons identified herein, i-wireless hereby notifies the Commission that i-wireless is withdrawing its application effective as of the date of this notice. Such withdrawal is without prejudice to resubmission of an ETC application at the appropriate time.

Respectfully Submitted this 23rd day of November, 2010.

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-Mail: lsteinhart@telecomcounsel.com

Attorney for i-wireless, LLC
CERTIFICATE OF SERVICE

I, Heather Kirby, hereby certify that on November 23, 2010, a copy of the foregoing Notice of Withdrawal was served via U.S. Mail to the following:

Office of Public Utility Counsel
1701 North Congress Avenue
Suite 9-180
Austin, TX 78701

Heather Kirby, Legal Assistant to
Lance J.M. Steinhart
Attorney for i-wireless, LLC
EXHIBIT B

Proposed Service Offering

i-wireless’ Lifeline offering proposes to give eligible customers three (3) Lifeline Plan choices:

**Option 1: Lifeline 150 Minutes Plan**
150 anytime minutes per month  
(additional usage priced at 10 cents per minute)  
Net cost to Lifeline customer: **$0**

*includes:
- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 150 minutes can be rolled over to following month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

**Option 2: Lifeline 250 Minutes Plan**
250 anytime minutes per month  
(additional usage priced at 10 cents per minute)  
Net cost to Lifeline customer: **$0**

*includes:
- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to 911 emergency services
- Free balance inquiries

**additional charges apply for:**
- incoming text messages (charge per text: 10 cents)
- calls to Customer Service (minutes decrement from customers 250 minutes)

**additional restrictions:**
- Minutes cannot be rolled over to next month
- Customer not eligible to earn additional minutes through the Kroger Free Minute Loyalty Program
Option 3: Lifeline $15 Retail Discount Plan*
Lifeline eligible customers may choose any i-wireless monthly retail plan (excluding text only plans) at a $15 discount. Current retail monthly plans are:

Talk Plans (monthly)

- 200 anytime minutes, unlimited text messages, unlimited data (web browsing and e-mail) (additional usage priced at 10 cent minutes)
  Net cost to Lifeline customer: $10 (plus applicable taxes and fees)

- Unlimited talk, unlimited text messages and unlimited data (web browsing and e-mail)
  Net cost to Lifeline customer: $40 (plus applicable taxes and fees)

*includes:
- Free handset
- Free Voicemail, Caller-ID and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 1500 minutes can be rolled over to next month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program