

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Carriers Eligible for Universal Service Support) WC Docket No. 09-197
)
kajeet, Inc.)
)
Petition for Designation as a Lifeline Eligible)
Telecommunications Carrier)
)

**SECOND AMENDMENT TO PETITION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER TO PARTICIPATE IN THE LIFELINE
PROGRAM**

kajeet Inc. (“kajeet”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (“Act”), and Section 54.201 of the rules of the Federal Communications Commission (“FCC” or “Commission”), hereby submits this second amendment to its petition for limited designation as an eligible telecommunications carrier (“ETC”) in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia, and the District of Columbia (collectively, the “FCC States”).¹

This second amendment revises kajeet’s proposed Lifeline service offering, modifies kajeet’s draft customer certification form, and provides additional detail on kajeet’s procedures to guard against the enrollment of duplicate subscribers.

¹ kajeet originally filed its petition on March 12, 2012, and filed an amended petition on March 26, 2012.

I. AMENDED LIFELINE SERVICE OFFERING

kajeet hereby amends its initial Lifeline service offering. kajeet's initial Lifeline offering will be as follows:

- \$4.99 per month
- 250 minutes per month
- 100 text messages per month
- Free parental controls (contact manager, time manager, feature manager)
- A range of top-quality affordable handsets starting at \$34.99
- Additional minutes at \$0.10 per minute
- Additional text messaging at \$0.10 per message
- Other services such as mobile data and picture messaging are available at standard kajeet rates

In addition, as kajeet has noted, kajeet is in the process of formulating a Lifeline broadband offering that it will submit in the window for Pilot Program proposals.

II. REVISED CUSTOMER CERTIFICATION FORM

Attached to this filing is kajeet's revised Lifeline customer certification form. The revised form adds an additional certification (numbered 12 on the form) for applicants seeking Tribal Lands benefits, per section 54.410(d)(3)(ii).

III. ADDITIONAL INFORMATION REGARDING PROCEDURES TO PREVENT INTERNAL DUPLICATE LIFELINE SUBSCRIBERS

At the request of Commission staff, kajeet provides the following additional information regarding the procedures it will put into place to guard against the enrollment of internal duplicate subscribers.

As noted in kajeet's Amended Application, kajeet will query applicable databases and check its own records to avoid duplicate Lifeline subscriptions for the same consumer or

household. Other than the interim or permanent duplicates databases (which kajeet will query wherever it has access to them), kajeet has no way to determine if a given customer or household is a duplicate served by another ETC. kajeet will check its own records, however, to prevent internal duplicates. In checking its own records, kajeet will follow the following procedure:

- The kajeet staff processing Lifeline orders will have access to an automated “Lifeline Duplicate Search” feature to assist with identifying/mitigating risk with kajeet duplicate subscriptions. This feature will be accessed from the same front-end system that is used to service accounts by Customer Care and Operations teams.
- kajeet’s Lifeline Duplicate Search feature will function as follows:
 1. Agent enters the first name, last name, street address, city, state, zip code, and alternate contact number (if provided)
 2. The duplicate search feature will return the following:
 - a. A listing of all Lifeline accounts where first initial of first name and last name match the information that was entered from the application
 - b. A listing of all Lifeline accounts where the last name, city, and state match the information that was entered from the application
 - c. A listing of all Lifeline accounts where the street address matches the information that was entered from the application
 - d. A listing of all Lifeline accounts where the street number, city, and state matches the information that was entered from the application
 - e. A listing of all Lifeline accounts where the last name and zip code matches the information that was entered from the application
 - f. A listing of all accounts where the account phone number matches the alternate contact number that was entered from the application
 3. The search results will be reviewed and possible matches will be researched further, either through kajeet online systems or additional reporting, to determine if the application could result in a duplicate Lifeline account. Accounts determined to be duplicates will be declined.

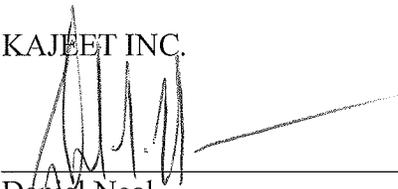
kajeet is confident that this procedure will be effective at preventing duplicate Lifeline accounts based on all available information internal to kajeet.

IV. CONCLUSION

kajeet respectfully requests that the Commission designate kajeet as an ETC in the FCC States.

Respectfully submitted,

KAJEET INC.

By: 

Daniel Neal

CEO & Founder

KAJEET INC.

7101 Wisconsin Ave., Suite 1111

Bethesda, MD 20814

(301) 652-2818

May 14, 2012

Exhibit A

Revised Draft kajeet Lifeline Customer Certification Form

KAJEET LIFELINE APPLICATION

This signed authorization is required in order to enroll you in the Lifeline Program in your state. This authorization is only for the purpose of verifying your participation in these programs 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.

Things to know about the Lifeline Program:

- (1) Lifeline is a federal benefit.
(2) Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers; and
(3) 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.

Applicant Information:

First Name: MI: Last Name: Date of Birth: Month Day Year

Social Security Number (or Tribal ID Number) : (XXX-XX-XXXX) Contact Telephone Number:

Residence Address (No P.O. Boxes, Must be your principal address): This address is Permanent Temporary Multi-Household (If temporary must update every 60 days.)

APT/ Floor/ Other City: State: ZIP Code:

Billing Address (May Contain and P.O. Box)

APT/ Floor/ Other City: State: ZIP Code:

I hereby certify that I participate in at least one of the following programs: (Check all that apply)

Initial Here

- Supplemental Nutrition Assistance Program (SNAP)
Supplemental Security Income (SSI)
Federal Public Housing Assistance
Low- Income Home Energy Assistance Program (LIHEAP)
National School Lunch Program
Temporary Assistance for Needy Families (TANF)
Medicaid

FOR OFFICE USE ONLY:

Company Representative:

Documentation Verified:

Representative Signature:

Date:

Is this a multi- family dwelling? _____

I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG). There are individuals in my household.

Initial Here

You must provide documented proof of your participation in the above programs or your income.

I certify, under penalty of perjury: (Initial by Each Certification)

- (1) The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
(2) I am a current recipient of the program checked above, or have an annual household income at or below 135% of the Federal Poverty Guidelines
(3) I have provided documentation of eligibility if required to do so.
(4) I understand that I and my household can only have one Lifeline-supported telephone service. Kajeet, Inc. has explained the one-per household requirement. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline program, and could result in criminal prosecution by the United States Government.
(5) I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline-supported service from any other land line or wireless company such as, for example, Safelink, Assurance, T-Mobile or Reachout Wireless.
(6) I understand my Kajeet Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
(7) I understand that if my service goes unused for sixty (60) days, my service will be suspended, subject to a thirty (30) day period during which I may use the service or contact Kajeet to confirm that I want to continue receiving their service.
(8) I will notify Kajeet within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:
(1) I cease to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines.
(2) I am receiving more than one Lifeline supported service;
(3) I no longer satisfy the criteria for receiving Lifeline support.
(9) I will notify Kajeet within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Kajeet every ninety (90) days. If I fail to respond to Kajeet's address verification attempts within thirty (30) days, my Kajeet Lifeline service may be terminated.
(10) Kajeet has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my Kajeet Lifeline service.
(11) I hereby authorize Kajeet to release information in this application to the administrator of the Lifeline Program (the Universal Service Administrative Company) or its contractors. This information will be kept confidential.
(12) (Residents of Tribal Lands only) I hereby certify that I am a resident of Tribal Lands (includes any federally recognized Indian Tribe's reservation, pueblo, or colony, including former reservations in Oklahoma; Alaska Native Regions, Indian Allotments; and Hawaiian Home Lands).

APPLICANT'S SIGNATURE

DATE