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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the	)	
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Talk N Text Wireless, LLC d/b/a TNT Wireless Compliance Plan	)	

**TALK N TEXT WIRELESS, LLC'S REVISED COMPLIANCE PLAN**

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

*Attorney for Talk N Text Wireless, LLC*

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## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	BACKGROUND .....	2
III.	TNT WIRELESS WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER.....	2
A.	Access to 911 and E911 Services.....	3
B.	E911-Compliant Handsets .....	3
C.	Consumer Eligibility and Enrollment .....	3
1.	One-Per-Household.....	4
2.	Initial and Annual Certification .....	5
3.	Annual Re-Certification.....	12
D.	Other Reforms to Eliminate Waste, Fraud and Abuse.....	14
1.	National Lifeline Accountability Database.....	15
2.	Subscriber Usage .....	16
3.	Marketing & Outreach .....	17
4.	Audits.....	18
E.	De-Enrollment.....	19
F.	Additional Rule Amendments.....	21
1.	Terms and Conditions of Service.....	21
2.	Reporting Requirements .....	21
3.	Reimbursement from USAC.....	22
4.	Section 54.202 Certifications.....	22
IV.	COMPANY INFORMATION.....	22
A.	Names and Identifiers .....	23
B.	Financial and Technical Capability .....	23
C.	Lifeline Offering.....	25
V.	CONCLUSION.....	28

**TABLE OF EXHIBITS**

	<u>Exhibit</u>
Sample Lifeline Certification Form .....	A
Sample Advertisements .....	B
Lifeline Terms and Conditions .....	C
Key Management Resumes.....	D
Proposed Lifeline Rate Plans .....	E

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**TALK N TEXT WIRELESS, LLC’S REVISED COMPLIANCE PLAN**

**I. INTRODUCTION**

Talk N Text Wireless, LLC (“TNT Wireless” or the “Company”) is a wireless telecommunications carrier seeking designation as an Eligible Telecommunications Carrier (“ETC”) solely for the purpose of participating in the Lifeline program. Although Section 214(e)(1)(A) of the Act requires an ETC to offer USF-supported services to some extent over its own facilities, the Federal Communications Commission (“FCC” or “Commission”) has forbore from that requirement for carriers that are, or seek to become, Lifeline-only ETCs.<sup>1</sup> TNT Wireless will avail itself of the FCC’s conditional grant of forbearance and, by its attorney, hereby files its Revised Compliance Plan outlining the measures it will take to implement the conditions of forbearance outlined in the *Order*.<sup>2</sup> This Revised Compliance Plan replaces in its entirety the Company’s

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<sup>1</sup> *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) (“*Order*”).

<sup>2</sup> Although the Company qualifies for and seeks to avail itself of the Commission’s grant of forbearance from the facilities requirement of section 214(e)(1)(A), the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state, particularly for purposes of state universal service funding under state program rules and requirements. The Company will follow the requirements of the Commission’s Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund.

original Compliance Plan filed June 26, 2012. Given the severe economic environment that is forcing many low-income customers to forego wireless service, TNT Wireless respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

## **II. BACKGROUND**

In the *Order*, the Commission granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:<sup>3</sup>

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan that: (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier’s various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.

## **III. TNT WIRELESS WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER**

TNT Wireless will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported pre-paid wireless service to customers throughout the United States.<sup>4</sup>

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<sup>3</sup> See *Order* at ¶¶ 368, 373 and 379.

<sup>4</sup> To the extent that future changes in federal regulations render the commitments herein invalid, the Company reserves the right to modify its operations in accordance with federal regulations in effect at that time.

**A. Access to 911 and E911 Services**

In the *Order*, the Commission requires TNT Wireless to provide its Lifeline customers with access to 911 and E911 services, regardless of activation status and availability of minutes.<sup>5</sup> The Commission and consumers are hereby assured that all TNT Wireless customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from TNT Wireless handsets even if the account associated with the handset has no minutes remaining.

**B. E911-Compliant Handsets**

The Commission also conditioned its grant of forbearance determination on TNT Wireless providing only E911-compliant handsets to its Lifeline customers.<sup>6</sup> TNT Wireless will ensure that all handsets used in connection with the Company's Lifeline service offering are E911-compliant. In the event that an existing TNT Wireless customer does not have an E911-compliant handset, the Company will replace it with a 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well.

**C. Consumer Eligibility and Enrollment**

TNT Wireless will certify and verify consumer eligibility for Lifeline in accordance with the requirements set forth in the *Order*. In instances where a state agency or third-party administrator is responsible for the initial determination and annual recertification of consumer eligibility, TNT Wireless will rely on the state identification or database.<sup>7</sup> In instances where TNT Wireless is responsible for the initial determination and annual recertification of consumer eligibility, the Company will follow the procedures set forth below.

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<sup>5</sup> See *Order* at ¶ 373.

<sup>6</sup> See *id.*

<sup>7</sup> See *Order* at ¶ 98.

## **1. One-Per-Household**

TNT Wireless understands that Lifeline is limited to a single subscription per household, and that the Commission has defined household as “any individual or group of individuals who are living together at the same address as one economic unit.”<sup>8</sup> Upon receiving an application for Lifeline support, TNT Wireless will check the duplicates database, once in place, to determine whether an individual at the applicant’s residential address is currently receiving Lifeline-supported service. TNT Wireless will also search its own internal database of active customers, real-time, pre-sale, to ensure that it does not already provide Lifeline-supported service to someone at that residential address. If TNT Wireless determines that an individual at the applicant’s address is currently receiving Lifeline-supported service, TNT Wireless will take an additional step to ensure that the applicant and the current subscriber are part of different households. To enable applicants to make this demonstration, TNT Wireless will require applicants to complete and submit to the Company USAC’s one-per-household template, which will contain the following: (1) an explanation of the Commission’s one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant’s household and share in the household’s expenses or benefit from the applicant’s income; and (4) the penalty for a consumer’s failure to make the required one-per-household certification (i.e., de-enrollment).<sup>9</sup> TNT Wireless will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial.

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<sup>8</sup> See Order at ¶ 74.

<sup>9</sup> See Order at ¶ 78.

On its certification forms, a draft sample of which is attached,<sup>10</sup> TNT Wireless will obtain a consumer's permanent residential address (which cannot be a P.O. Box or General Delivery address), unless they only have a temporary address, and a billing address for the service, if different (which may include a P.O. Box or General Delivery address).<sup>11</sup> TNT Wireless will inquire on its certification forms whether or not the applicant's address is a temporary one.<sup>12</sup> If and when the 90-day verification rules become effective, TNT Wireless will notify the consumer that if they have a temporary address, the Company will contact the consumer every 90 days, by phone or text, to verify that he or she continues to rely on that address, and that if the consumer fails to respond within 30 days of TNT Wireless's attempt to verify the temporary address, he or she will be de-enrolled from the Lifeline program.<sup>13</sup> Also on its certification forms, TNT Wireless will explain that if the subscriber moves, they must provide their new address to the Company within 30 days of moving.<sup>14</sup> If the subscriber has moved, TNT Wireless will update the duplicates database, once in place, with the information within 10 business days of receipt of the information.<sup>15</sup>

As detailed below, TNT Wireless's certification form will clearly explain the one-per-household requirement and all consumers must certify that they receive Lifeline support for a single subscription per household.

## **2. Initial and Annual Certification**

Consumers will be signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company website, which will provide

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<sup>10</sup> See Exhibit A. The draft form remains subject to change, but substantially reflects the content of the Company's application.

<sup>11</sup> See Order at ¶ 85.

<sup>12</sup> See Order at ¶ 89.

<sup>13</sup> See *id.* As of the date of filing of this Compliance Plan, this requirement has not been approved pursuant to the Paperwork Reduction Act.

<sup>14</sup> See Order at ¶ 85.

<sup>15</sup> See *id.*

information regarding the Company's Lifeline service plans, including a detailed description of the program and state-specific eligibility criteria. TNT Wireless's application form will identify that it is a "Lifeline" application. TNT Wireless will provide Lifeline-specific training to all personnel, whether employees, agents or representatives, that interact with actual or prospective consumers with respect to obtaining, changing or terminating Lifeline services.

TNT Wireless's initial and annual certification forms will conform to the list of requirements provided in the *Order*, Appendix C and with C.F.R. § 54.410(d), as amended. TNT Wireless's Lifeline certification forms, a draft sample of which is attached as Exhibit A, will require each prospective subscriber to provide the following information:

- (i) The subscriber's full name;
- (ii) The subscriber's full residential address;
- (iii) Whether the subscriber's residential address is permanent or temporary;
- (iv) The subscriber's billing address, if different from the subscriber's residential address;
- (v) The subscriber's date of birth;
- (vi) The last four digits of the subscriber's social security number, or the subscriber's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a social security number;
- (vii) If the subscriber is seeking to qualify for Lifeline under the program-based criteria, as set forth in § 54.409, the name of the qualifying assistance program from which the subscriber, his or her dependents, or his or her household receives benefits; and
- (viii) If the subscriber is seeking to qualify for Lifeline under the income-based criterion, as set forth in § 54.409, the number of individuals in his or her household.

The certification forms will also explain in clear, easily understandable language that:

- (i) Lifeline is a federal benefit;
- (ii) Lifeline service is available for only one line per household;
- (iii) 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;
- (iv) households are not permitted to receive benefits from multiple providers;
- (v) that violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- (vi) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

TNT Wireless will require all consumers, at sign up and annually thereafter, to certify under penalty of perjury that:

- (i) The subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline, provided in § 54.409;
- (ii) The subscriber will notify the carrier within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit.
- (iii) If the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 54.400(e);
- (iv) If the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days;
- (v) If the subscriber provided a temporary residential address, he or she will be required to verify his or her temporary residential address every 90 days;
- (vi) The subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service;
- (vii) The information contained in the subscriber's certification form is true and correct to the best of his or her knowledge,
- (viii) The subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and
- (ix) The subscriber acknowledges that the subscriber may be required to re-certify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).

Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements. Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.<sup>16</sup>

Enrollment in person. The Company will primarily enroll Lifeline applicants in person at

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<sup>16</sup> See Order at ¶ 168.

Company events. The Company estimates that 90% of Lifeline applicants will be enrolled via these Company events. These events will be staffed by Company employees. When a prospective customer applies at an event, Company employees, agents or representatives (“personnel”) will ask to see a government issued ID and will validate the address via a USPS/Melissa Database and simultaneously input the name/address combination into CGM, LLC’s aggregate duplicate database (see section III.D below) to confirm that the applicant is not already receiving a Lifeline subsidy from TNT Wireless or any other CGM client that has agreed to share their data. If the customer indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC’s one-per-household template as well. In cases where an eligibility database exists, personnel will query the database to determine eligibility. In states where eligibility databases are not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. TNT Wireless’s Lifeline application contains an “Office Use Only” section, which must be completely filled out and signed by Company personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). Eligibility documents are returned to the customer after review. Finally, TNT Wireless personnel will verbally review all certifications and disclosures with the applicant before they sign the application form, making sure the applicant verbally acknowledges each required certification before moving on to the next. Once the Lifeline application is complete, it is scanned into the Company’s database. Upon successful completion of the certification process, the customer is allowed to choose a service plan and receive their free phone in person. In instances where eligibility databases cannot be accessed in real-time, TNT Wireless will mail the phone to

eligible customers once verification of eligibility is complete. The customer's account is then activated upon the customer's personal initiation or actual use of the phone.

TNT Wireless may also enroll customers at retail stores, in which case the protocol for signing up customers closely resembles the process at an event. Company employees, agents or representatives are able to access necessary databases (USPS/Melissa, duplicates database, eligibility databases) to verify eligibility, and, when required, can personally review eligibility based on proof of income or program participation. Company personnel are able to verbally review the required disclosures with applicants and obtain the completed application form in person. Phones are delivered upon successful completion of the certification process, as detailed above, and the customer's account is activated upon the customer's personal initiation or actual use of the phone.

Enrollment by phone. With respect to those enrolling via the phone, Company personnel are able to verbally explain the Lifeline program and its eligibility requirements, including required information and disclosures, as well as collect and input electronically the application form information and obtain the applicant's signature via IVR. If the customer indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC's one-per-household template as well. If no eligibility database is available, personnel will advise the applicant that they are required to provide proof of identity verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company as well as what documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). If no eligibility database is available, the application will be placed in a "hold" status until the Company receives copies of the applicant's proof documentation and government-issued ID, at which point Company

personnel will review the documentation and complete the “Office Use Only” section of the application form, which must be completely filled out and signed by personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). TNT Wireless will destroy copies of proof documentation and deliver phones to eligible customers by mail. The customer’s account is activated upon the customer’s personal initiation or actual use of the phone.

Enrollment online. When enrolling via the Internet, prospective customers will be able to fill out an application form online and sign electronically. TNT Wireless will highlight the certifications that are required, for example, by requiring consumers to acknowledge each certification before moving on to the next field.<sup>17</sup> If the customer indicates that their address is a multi-household residence, online interface will require the applicant to complete USAC’s one-per-household template as well. If no eligibility database is available, the online interface will advise the applicant that they are required to provide proof of identity verification of benefits before their Lifeline service can be activated; applicants will be made aware of how to submit the required documentation to the Company as well as what documentation qualifies as proof of benefits. The Company will qualify the applicant by accessing necessary databases (USPS/Melissa, duplicates database, eligibility databases). If no eligibility database is available, the application will be placed in a “hold” status until the Company receives copies of the applicant’s proof documentation and government-issued ID, at which point Company personnel will review the documentation and complete the “Office Use Only” section of the application form, which must be completely filled out and signed by personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of

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<sup>17</sup> See *Order* at ¶ 123.

documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). TNT Wireless will destroy copies of proof documentation and deliver phones to eligible customers by mail. The customer's account is activated upon the customer's personal initiation or actual use of the phone.

TNT Wireless will determine eligibility utilizing the income and program criteria currently utilized by federal default states (47 C.F.R. § 54.409(a),(b)), as well as any additional state-specific criteria. Prior to enrolling a new subscriber, TNT Wireless will check the eligibility of low-income consumers first by accessing state or federal social services electronic eligibility databases, where available.<sup>18</sup> If a database is used to establish eligibility, TNT Wireless will not require documentation of the consumer's participation in a qualifying federal program; instead, TNT Wireless or its representative will note in its records a description of what specific data was relied upon to confirm the consumer's initial eligibility for Lifeline.<sup>19</sup> However, in states where there is no state administrator, the state commission or other state agency is not making eligibility determinations, and there is no automated means for TNT Wireless to check electronic databases for eligibility, TNT Wireless will review documentation to determine eligibility for new subscribers until such time as a qualifying eligibility database is available.<sup>20</sup> TNT Wireless will require acceptable documentation both for income eligibility and for program eligibility. The Company will not retain copies of the documentation but rather will establish policies and procedures to review such documentation and keep accurate records detailing how the consumer demonstrated his or her eligibility.<sup>21</sup> TNT Wireless understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in

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<sup>18</sup> See Order at ¶ 97.

<sup>19</sup> See Order at ¶ 98.

<sup>20</sup> See Order at ¶ 99.

<sup>21</sup> See Order at ¶ 101.

such cases TNT Wireless remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.<sup>22</sup>

TNT Wireless provides employees, agents, and representatives with training designed to give them an understanding of Lifeline program requirements and permit them to review customer documentation and determine whether it is sufficient to establish a customer's eligibility to participate in the Lifeline program under the Commission's rules. No Company employee, agent, or representative may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material. Among other things, the Lifeline program training discusses the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training explains what sections of the form must be completed by the customer and reviews the form disclosures in detail, to facilitate an employee's ability to explain each item contained therein and answer any customer questions.

### **3. Annual Re-Certification**

TNT Wireless is not currently providing any Lifeline service; therefore, the Company does not have any current Lifeline customers. However, the Company understands that it must re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility on an annual basis, and will do so annually by the anniversary of their enrollment.<sup>23</sup> The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. TNT Wireless will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The

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<sup>22</sup> See *Order* at ¶ 110.

<sup>23</sup> See *id.*

Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. TNT Wireless understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.<sup>24</sup>

Alternatively, where a database containing consumer eligibility data is available, TNT Wireless (or state agency or third-party, where applicable) will instead query the database by the end of 2012 and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, TNT Wireless will contact the subscriber every year during the annual certification process to obtain a valid address.<sup>25</sup> After 2012, TNT Wireless will continue to annually certify the continued eligibility of its entire subscriber base, either by accessing a qualifying database, or by electing to have USAC administer the self-certification process on the Company's behalf.<sup>26</sup>

TNT Wireless will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for reimbursement. As part of TNT Wireless's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

(1) that the Company has procedures in place to review consumers' documentation of income-and program-based eligibility. In instances where the Company confirms consumer eligibility by relying on official program eligibility data, such as a state or federal database, an officer of the Company will attest to what data the Company uses to confirm consumer eligibility in each state, and

(2) that the Company is in compliance with all federal Lifeline certification

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<sup>24</sup> See Order at ¶ 132.

<sup>25</sup> See Order at ¶ 131.

<sup>26</sup> See Order at ¶ 133.

procedures.<sup>27</sup>

#### **D. Other Reforms to Eliminate Waste, Fraud and Abuse**

TNT Wireless shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Company customers from engaging in such abuse of the program, inadvertently or intentionally.

TNT Wireless has implemented enrollment procedures designed to prevent subsidies for duplicate, ineligible, or inactive subscribers. The Company contracts with a third party Lifeline service bureau, currently CGM, LLC of Roswell, Georgia, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described herein, TNT Wireless ensures that it does not over-request from support funds.

As detailed in section III.C.2, TNT Wireless first validates each applicant's identity via a government issued ID card, passport, etc. Additionally, as mentioned above, TNT Wireless requires the applicant to provide their date of birth (DOB) and last four digits of their social security number (SSN). Requiring DOB and SSN ensures that neither the applicant nor the Company representative can forge certification forms based on false names and addresses. Once the applicant's identity is confirmed, TNT Wireless verifies that the applicant is eligible to receive the Lifeline subsidy. To do this, TNT Wireless checks any available eligibility database. If one is not available, the applicant

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<sup>27</sup> See Order at ¶ 126-27.

is required to provide proof of eligibility. This prevents ineligible applicants from receiving the subsidy.

TNT Wireless verifies the address of the applicant first via the applicant's government issued ID, then validates the address via a USPS/Melissa Database to ensure the address is correct. Simultaneously, the name/address combination is dipped into CGM's aggregate duplicate database to confirm that the applicant is not already receiving a Lifeline subsidy from TNT Wireless or any other CGM client that has agreed to share their data. This is done through an API connection between the Company's provisioning platform and CGM. This then prompts the representative to detail the one-per-household rule with the applicant.

#### **1. National Lifeline Accountability Database**

TNT Wireless will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, TNT Wireless will provide to the database subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.<sup>28</sup> TNT Wireless will provide the information listed above for existing subscribers within 60 days of Commission notice that the database is capable of accepting subscriber information.<sup>29</sup>

Furthermore, on its certification form, TNT Wireless will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name, telephone number, and address will be divulged to USAC (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more

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<sup>28</sup> See *Order* at ¶ 189.

<sup>29</sup> See *Order* at ¶ 190.

than one Lifeline benefit.<sup>30</sup>

Within 30 days following Commission notice that the database is capable of accepting queries, TNT Wireless will query the database to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from the Fund.<sup>31</sup>

## **2. Subscriber Usage**

TNT Wireless will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, TNT Wireless will not seek reimbursement from the USF for inactive pre-paid subscribers who have not used the service for a consecutive 60-day period.<sup>32</sup> TNT Wireless will notify its subscribers at service initiation, via the certification form and via script that is reviewed with every customer, about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.<sup>33</sup> An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.<sup>34</sup> TNT Wireless utilizes tracking software to notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. Furthermore, a third party contractor validates the Company's subsidy data to prevent a subsidy request for

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<sup>30</sup> See Order, Appendix C.

<sup>31</sup> See Order at ¶ 203.

<sup>32</sup> See Order at ¶ 257.

<sup>33</sup> See *id.*

<sup>34</sup> See Order at ¶ 261.

customers that are inactive under the Company's non-usage policy.<sup>35</sup> After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the procedures outlined in section E below. TNT Wireless will continue to comply with applicable public safety, including transmitting 911 calls to the appropriate PSAP even if the Company is no longer providing Lifeline service to a consumer.<sup>36</sup>

### **3. Marketing & Outreach**

TNT Wireless will employ several key unique strategies for marketing and distribution. The TNT Wireless marketing strategy is, at its core, to be where the customers live, work and play. Whereas other Lifeline service providers spend their time, money and efforts on mass-marketing, TNT Wireless distribution teams will embed themselves within the community fostering relationships with local community groups, government agencies and non-profit volunteer groups, e.g. the Rotary Club, Boys and Girls Clubs of America, The Impact Network, Goodwill, community homeless shelters, outreach programs, United Way, Volunteers of America, Salvation Army, and local churches.

TNT Wireless will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. TNT Wireless will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:<sup>37</sup>

(1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the

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<sup>35</sup> CGM, LLC is currently the Company's third party contractor.

<sup>36</sup> See Order at ¶ 262. 911 transmissions will actually be performed by the Company's underlying facilities-based CMRS provider.

<sup>37</sup> See Exhibit B for a sample advertisement. The Company understands the term "marketing materials" includes materials in all media, including but not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. See Order at ¶ 275.

program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. TNT Wireless's website and printed collateral will explain the documentation necessary for enrollment, and the details of TNT Wireless's plans. Such collateral and website information, as well as its application, will make clear that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.<sup>38</sup> For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, TNT Wireless will include the URL link for its website where disclosures will be listed. Additionally, TNT Wireless will disclose the company name under which it does business.<sup>39</sup>

#### **4. Audits**

The *Order* requires ETCs that draw \$5 million or more in the aggregate on an annual basis from the low-income program, as determined on a holding company basis taking into account all operating companies and affiliates, to hire an independent licensed certified public accounting firm to conduct a biennial audit according to government accounting standards to assess the ETC's overall compliance with the program's requirements.<sup>40</sup> TNT Wireless will comply with this requirement if and when it is approved, including applicable rules regarding the dissemination of audit findings to the Commission, USAC, and relevant state and Tribal governments within 30 days upon issuance.<sup>41</sup>

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<sup>38</sup> See *Order* at ¶ 275.

<sup>39</sup> See *id.*

<sup>40</sup> See *Order* at ¶ 291.

<sup>41</sup> See *Order* at ¶ 294. As of the date of filing of this Compliance Plan, the audit requirement has not been approved pursuant to the Paperwork Reduction Act.

## **E. De-Enrollment**

If at any time a TNT Wireless Lifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-enrollment requests. TNT Wireless Lifeline customers simply call the Company's toll-free customer service number and speak to a live operator to de-enroll from TNT Wireless' Lifeline program. Furthermore, TNT Wireless will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

Ineligibility. Any subscriber who indicates that he or she is receiving more than one Lifeline-supported service per household, or neglects to make the required one-per-household certification on his or her certification form, will be de-enrolled from Lifeline pursuant to the process for resolving duplicative Lifeline subscriptions described in section 54.405(e)(2).<sup>42</sup>

If a customer does not respond to the Company's annual verification survey within 30 days, or if TNT Wireless has reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), TNT Wireless will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.<sup>43</sup> Similarly, TNT Wireless will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.<sup>44</sup>

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated

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<sup>42</sup> See Order at ¶ 122.

<sup>43</sup> See *id.* In states that have dispute resolution procedures applicable to Lifeline termination, the Company will comply with the state requirements.

<sup>44</sup> See Order at ¶ 89.

Duplicate Scrubbing Process,<sup>45</sup> TNT Wireless will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. TNT Wireless will de-enroll any pre-paid subscriber that has not used the Company's Lifeline service for 60 consecutive days, as discussed in section IV.B above. TNT 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. TNT Wireless will update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.<sup>46</sup>

Post-Paid. TNT Wireless' post-paid customers are required to pay in full by the due date. TNT Wireless has a 10-day grace period for post-paid customers. If TNT Wireless does not receive payment in full by the 11<sup>th</sup> day after the due date on the subscriber's bill, the subscriber may be charged a late fee of the greater of 1.5% per month (18% annually) or \$5/month, subject to the maximum allowed by law. TNT Wireless may use a collection agency and the subscriber agrees to pay collection agency fees TNT Wireless incurs to collect payment. If TNT Wireless accepts late or partial payments, TNT Wireless does not waive the right to collect all amounts that the subscriber owes, including late fees. If the subscriber's check, electronic funds transfer payment, including debit or Automated Clearing House payment, or any other payment is dishonored or returned, TNT Wireless may charge the subscriber \$35, or the maximum amount allowed under applicable law. TNT Wireless may also require the subscriber to use another

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<sup>45</sup> See Order at ¶ 214-16.

<sup>46</sup> See Order at ¶ 257.

payment method, and/or immediately suspend or cancel the subscriber's Service. Late payment, non-payment or collection agency fees are liquidated damages intended to be a reasonable advance estimate of TNT Wireless' costs resulting from late payments and non-payments by customers; these costs are not readily ascertainable and are difficult to predict or calculate at the time that these fees are set.

## **F. Additional Rule Amendments**

### **1. Terms and Conditions of Service**

TNT Wireless has attached as Exhibit C its Lifeline terms and conditions of service. The Company's Lifeline offering is summarized in section IV.C below. These terms and conditions are subject to change as needed, and the most current version may be found at [www.talkntext.net](http://www.talkntext.net). The terms and conditions of the Company's retail plans, as generally available to the public and to which a Lifeline customer can apply their Lifeline discount, can also be found at [www.talkntext.net](http://www.talkntext.net).

### **2. Reporting Requirements**

TNT Wireless will report all information required by section 54.422, including as it may heretofore be amended. This includes the names of the Company's holding company, operating companies and affiliates, and any branding ("doing-business-as company" or brand designation), and provide to the Commission and USAC general information regarding the terms and conditions of the Lifeline plans for voice telephony service offered specifically for low income consumers through the program offered during the previous year, including the number of minutes provided, and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.<sup>47</sup>

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<sup>47</sup> See *Order* at ¶ 296, 390. Section 153 of the Communications Act defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person."

### **3. Reimbursement from USAC**

In seeking reimbursement for Lifeline, TNT Wireless will comply with the requirements of C.F.R. § 54.407, as revised by the *Order*.<sup>48</sup> TNT Wireless will certify when seeking reimbursement that the Company has obtained a valid certification form for each consumer for whom the Company seeks Lifeline reimbursement,<sup>49</sup> and the Company will seek reimbursement for actual lines served, not projected lines.<sup>50</sup>

### **4. Section 54.202 Certifications**

TNT Wireless certifies the following in accordance with newly amended C.F.R. § 54.202: (1) TNT Wireless will comply with the service requirements applicable to the support that it receives; (2) TNT Wireless is able to remain functional in emergency situations; (3) TNT Wireless will satisfy applicable consumer protection and service quality standards.

## **IV. COMPANY INFORMATION**

TNT Wireless is a Texas limited liability company. TNT Wireless will provide pre-paid and post-paid wireless telecommunications services to consumers by using the network of its underlying carrier(s), currently Sprint Spectrum L.P. (“Sprint”). Sprint is a nationwide carrier that provides wholesale capacity on its wireless network to resellers like TNT Wireless. TNT Wireless will obtain from Sprint, via Telecom Service Bureau, Inc. (“TSB”), the network infrastructure and transmission facilities to allow TNT Wireless to operate as a Mobile Virtual Network Operator (“MVNO”).

TNT Wireless has contracted with ReWireless, LLC (“ReWireless”) for the purpose of acquiring wireless handsets, which, in turn, are placed on the TNT Wireless network, and then reprogrammed by ReWireless for TNT Wireless customers. ReWireless is a Texas limited liability

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<sup>48</sup> See *Order* page 221.

<sup>49</sup> See *Order* at ¶ 128.

<sup>50</sup> See *Order* at ¶ 302.

company located in Southlake, Texas. ReWireless programs wireless handsets and has programmed approximately 250,000 handsets for several ETCs throughout the United States since April 2011.

TNT Wireless has also contracted with ASAP Distributors, LLC (“ASAP”). ASAP is a distribution company that employs field representatives from its home office in Texas, specifically for the distribution of Lifeline wireless handsets to eligible Lifeline customers. To date, ASAP has distributed approximately 300,000 phones for several ETCs throughout the United States since June 2010.

**A. Names and Identifiers**

The Company’s legal name is Talk N Text Wireless, LLC d/b/a TNT Wireless. TNT Wireless does not have any holding companies, operating companies, or affiliates. The Company identifies itself as Talk N Text Wireless or TNT Wireless on its marketing and advertising materials.

**B. Financial and Technical Capability**

TNT Wireless is financially and technically capable of providing Lifeline-supported services.<sup>51</sup> TNT Wireless will not rely exclusively on USF disbursements to operate. TNT Wireless will offer its wireless service to both retail and Lifeline customers as a source of revenue. The Company estimates that approximately 30% of the customer base will opt to purchase its Unlimited Plan, as well as approximately 15% of the customer base that will take advantage of the upsell of premium phone models at a discounted rate. TNT Wireless has secured initial investment funds that the Company will rely on for start-up operations. With another substantial investment expected within the next six months, TNT Wireless will be able to sustain operations and further growth.

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<sup>51</sup> See Order at ¶ 387.

In addition to initial investment funds and USF disbursements, TNT Wireless has several other revenue-generating sources. TNT Wireless will upsell premium phone models, as well as sell additional minute plan packages, which the Company estimates approximately 10-15% of the customer base will purchase. TNT Wireless also makes available to customers several other revenue-generating affiliates, such as Free411 and 1800COLLECT, which offer services to customers while generating revenue for the Company.

TNT Wireless has contracted with NetSpend Corporation (“NetSpend”). TNT Wireless will offer the NetSpend service to Lifeline customers as a completely optional and secondary product offering to the Company’s Lifeline wireless service. NetSpend’s Benefits Express Program allows TNT Wireless Lifeline customers receiving government assistance, such as SNAP, TANF, and other benefits, to receive the benefits up to 5 days earlier, once enrolled. TNT Wireless’ relationship with NetSpend is unique in that eligible Lifeline customers are able to enroll in the NetSpend Benefits Express Program on-site at TNT Wireless events and retail locations, at the actual time the customer’s eligibility is confirmed and he/she receives a TNT Wireless handset. The eligible Lifeline customer would receive a wireless handset at a TNT Wireless event upon verification of eligibility and then, at the same event, be able to apply for the NetSpend Benefits Express Program and receive a temporary NetSpend card. Once the customer information is verified by NetSpend, he/she will receive a permanent NetSpend card from NetSpend, to which the government benefits are tied.

TNT Wireless has not been subject to enforcement action or ETC revocation proceedings in any state. Furthermore, the senior management of TNT Wireless has great depth in the telecommunications industry and offers extensive telecommunications business technical and

managerial expertise to the Company.<sup>52</sup> TNT Wireless' management team has over 40 years of experience, collectively, in the telecommunications industry. TNT Wireless will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

### **C. Lifeline Offering**

TNT Wireless will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, currently Sprint.<sup>53</sup> As summarized in Exhibit E attached hereto, the Company's Lifeline offering will provide customers the option to choose a plan<sup>54</sup> that best meets their needs:

1. Lifeline Unlimited Plan (Pre-Paid). Under this plan, eligible Lifeline customers will receive a discount on the Company's Retail Unlimited Minute Plan (Pre-Paid). Lifeline customers choosing this plan will receive a free phone and will enjoy 100 free anytime minutes and pre-pay the discounted rate for an additional unlimited anytime minutes. The discount is equal to the federal Lifeline subsidy. These minutes do not rollover and text messaging is at the rate of one minute (1 incoming or outgoing text = 1 minute of voice).
2. Lifeline 150 Minute Plan (Post-Paid). Under this plan, eligible Lifeline customers will receive a discount on the Company's Retail 150 Minute Plan (Post-Paid). Lifeline customers choosing this plan will receive a free phone and will enjoy 100 free anytime minutes and will be billed the discounted rate for the additional 50

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<sup>52</sup> See Exhibit D for key management resumes.

<sup>53</sup> The Company reserves the right to alter the proposed Lifeline rate plans on a state-by-state basis, particularly as required by state public utility commissions (PUC). The Company commits to pass through the entire Lifeline subsidy amount directly to the consumer.

<sup>54</sup> The Company may alter its Lifeline offering as necessary on a state-by-state basis, particularly as required by state public utility commissions or Tribal offerings. Please see the Company's website ([www.talkntext.net](http://www.talkntext.net)) for more detailed information regarding plans available in each state.

anytime minutes.<sup>55</sup> The discount is equal to the federal Lifeline subsidy. These minutes do not rollover and text messaging is at the rate of one minute (1 incoming or outgoing text = 1 minute of voice).

3. Lifeline Free 250 Minute Plan. Under this plan, eligible Lifeline customers will receive a discount on the Company's Retail 250 Minute Plan (Pre-Paid). Lifeline customers choosing this plan enjoy 250 free anytime minutes but must purchase a phone separately. The discount is equal to the federal Lifeline subsidy. These minutes do not rollover and text messaging is at the rate of one minute (1 incoming or outgoing text = 1 minute of voice.)
4. Lifeline Free 100 Minute Plan. Under this plan, eligible Lifeline customers will receive a discount on the Company's Retail 100 Minute Plan (Pre-Paid). Lifeline customers choosing this plan will receive a free phone and will enjoy 100 free anytime minutes. The discount is equal to the federal Lifeline subsidy. These minutes do not rollover and text messaging is at the rate of one-third of one minute (3 incoming or outgoing texts = 1 minute).

Customers have the capability of purchasing additional bundles of minutes in denominations as low as \$5, \$10, and \$20.<sup>56</sup> Additional airtime can be purchased by calling Customer Service, at no decrement in minutes, or by contacting Customer Service via the Company's website [www.talkntext.net](http://www.talkntext.net). In addition to free voice services, all of TNT Wireless' Lifeline plans will include the following Custom Calling features: Caller ID, Call Waiting, and Voicemail.

Customers are not bound by a local calling area requirement; all plans come with

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<sup>55</sup> Customer will be billed either electronically or via paper billing. Electronic billing is at no additional charge. Paper billing incurs an additional charge of \$2.00 per month.

<sup>56</sup> \$5 = 35 minutes; \$10 = 75 minutes; \$20 = 160 minutes.

domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Nationwide Sprint Spectrum Network. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Calls to Customer Service are also free. TNT Wireless does not impose burdensome credit checks or long-term service contracts on its customers. Both Retail and Lifeline customers that choose the 150 Minute Plan are required to sign a short-term 6-month contract. Benefits of this 6-month contract include credit repair and credit building. TNT Wireless has partnered with a third party, PRBC, Inc., which will allow the Company to report all on-time customer payments to the three major credit bureaus, thus reflecting a positive payment history for wireless service on the customer's individual consumer credit report. The 6-month contract allows enough time for all of the major credit reporting agencies to reflect the positive and on-time payments TNT Wireless customers make for their wireless service. Such positive and on-time payments will assist credit-challenged customers receive positive points on their individual credit report. Furthermore, Lifeline Contract Customers are eligible to upgrade to the Company's Lifeline Unlimited Plan with an additional \$5.00 Contract Customer Discount. Full terms and conditions of the Company's plans are attached as Exhibit C and can also be found at [www.talkntext.net](http://www.talkntext.net).

V. **CONCLUSION**

TNT Wireless submits that this Revised Compliance Plan fully satisfies the conditions of forbearance set forth in the Commission's *Order*. Implementation of the procedures described herein will promote public safety and should ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the Company's Lifeline services. Accordingly, TNT Wireless respectfully requests that the Commission expeditiously approve this Compliance Plan, as revised, so that the Company may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers as quickly as possible.

Respectfully submitted,

Talk N Text Wireless, LLC

/s/ Lance J.M. Steinhart

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

*Its Counsel*

Dated August 28, 2012

**Exhibit A**  
Sample Lifeline Certification Form

**Exhibit B**  
Sample Advertisements

Marketing Trifold

**Exhibit C**  
Lifeline Terms and Conditions

**Exhibit D**  
Key Management Resumes

### **Bassam Abdallah, President**

Mr. Abdallah is an alumnus of DePaul University where he earned a Bachelor's of Science Degree in Computer Science in 1983. Upon completion of his studies, he was employed for Isticharat as a Cobol Programmer within their IT Department. His responsibilities included coding, analysis and testing financial applications. He remained employed there until he decided to use his experience to gain employment with the California Judicial Council in 1989 as a programmer, responsible for the coding of applications used to track inventory and payroll until 1987. It was in 1998 when Mr. Abdallah decided to change career paths and enter into the Telecommunications field as Director, with Global Connections, where he served till 2008. Due to his education and extensive programming experience, Mr. Abdallah had supervised the in-house development of the company's software applications and has since been a vital part of the development in the functionality and operational departments required in the success of Global Connections. Throughout his career, he has proactively stayed abreast of continuous changes within the industry in order to be effective in his role as Director of Global Connections and as a Board Member of the NALA Organization. Also, his knowledge of the 1996 deregulation code and its impact on the Telecommunication industry has helped in effectively negotiating interconnection agreements with other ILECs that govern the relationship between those companies. He also served as the single point of contact between Global Connection and these ILECs so that the positive relationship built between those companies is maintained and continued to develop. Because of the increasing demand for implementing changes and remaining compliant with the various governing bodies involved within the Telecommunications industry, Mr. Abdallah has also continued to educate himself in the functions which relate to the networking aspects, including, but not limited to those regarding the workings of voice components, switches, common transport, loops and ports, etc. This knowledge is crucial in his ability to participate in the ATT User Group meetings which allows Global Connections, among other CLECs, discuss the problems and issues between Bellsouth and the CLECs community in order to improve productivity. These improvements encompass Mr. Abdallah to gain insight into the implementation of new products such as VOIP (voice over IP) technology, negotiate with different MVNO's the possibility of using their platforms to offer wireless services to potential customers. Mr. Abdallah was in charge of cost control and that was essential in Global Connection being profitable for eight successive years. Additionally, Mr. Abdallah has most recently served as a founding member and the Director of Operations for U.S. Connect, a wireless ETC with high growth rate and was intricate in the setup and management of U.S. Connect. It's through this dedication and thrives for success that has made Mr. Abdallah a valuable asset in this telecommunications industry.

**Eric D. Fein, Esq., Vice-President**

Mr. Fein has been involved in the telecommunications industry for the past three years in a managerial role and has served as legal counsel for various telecommunications companies. Also, Mr. Fein is the owner, founder, and managing partner of the Fein Law Firm, P.C. in Dallas, Texas and has been practicing law since his appointment to the New York Bar in February of 1980. Mr. Fein was appointed as an Administrative Law Judge in October, 1985 by the City of New York, Department of Transportation, and holds admissions to every court in the following states: Texas, New York, Illinois, and California. In addition, Mr. Fein has been admitted to the United States Supreme Court, The U.S. Court of Appeals- Fifth Circuit, The United States Court of Claims, and the United States District Court: Northern District and Eastern District of Texas, the Southern and Eastern Districts of New York, the Central District of California, and the Northern District of Illinois. Mr. Fein's 32-year legal career is extensive and covers the following practice areas: Telecommunications Law, Commercial Business Law, Business Contracts and Negotiations, Commercial Litigation, Telecommunications, Copyright and Trademarks, Collections, Insurance Disputes, Buy-Sell, Employment and Labor Law, Franchise, Corporate Law, Business Formation and Governance, Sports and Entertainment, Shareholder Disputes, Construction, Estate, Oil and Gas, Personal Injury, and Medical Malpractice. Mr. Fein received his B.A. in 1975 from the State University of New York at Buffalo, then continued his education and received his Juris Doctor from Capital University Law School in Columbus, Ohio in 1978.

**David F. Martin, Secretary**

Mr. Martin's strengths and successes lie in the implementation of productivity enhancement systems via his keen ability to examine business process analysis and improvements. Mr. Martin has had his foot in the distribution, warehousing, inventory control, and logistics space since 1988, with a solid knowledge of the international environment and Foreign Trade Zones. He has served in a variety of operational and administrative positions in a diverse range of industries. His titles have included Global Logistics Manager, Operations Manager, Distribution Center General Manager, Director of Operations, Warehouse Manager, Inventory Control Manager, and Purchasing Manager. Throughout his 24-year and counting career, Mr. Martin has consistently decreased departmental and company loss, increased profitability, and improved efficiency and productivity. Mr. Martin has also led a successful career as a consultant due to his ability to quickly examine business processes and engineer new business strategies and models to increase operational efficiency within organizations while maintaining a resilient focus on day-to-day operations. Most recently, Mr. Martin has held the position of Chief Operations officer for U.S. Connect, and through his management and operational skills, assisted the company's growth from zero to approximately 80,000 customers through distribution in less than a year. Mr. Martin is a graduate of the University of Texas at Arlington, and has his B.S. in Business Administration with a Pre-Law and Accounting focus.

**Bryan D. Bulloch, CPA, Treasurer**

Mr. Bulloch's strengths and successes grow from being an officer and shareholder of Bulloch, Dupertuis, Schulman, Seger & Co., PC for over 12 years. He is a CPA and as an officer and shareholder, Mr. Bulloch has helped grow the company and service clients who have annual revenue of up to \$45,000,000. He has a Bachelor's of Business Administration and a Master's Degree in Taxation. Mr. Bulloch has helped to build an advertising and multi-media company from 25 employees to over 400 employees, and has expanded into 15 major markets internationally. Mr. Bulloch has served as tax director, tax manager, and tax staff in numerous companies and has assisted in growing these clients into international million dollar companies. He has multiple degrees in Business and Accounting from Baylor University of Waco, Texas.

**Exhibit E**  
Proposed Lifeline Rate Plans

**All TNT Wireless Lifeline plans include the following:**

- Free calls to 911 emergency services and Customer Service
- Free domestic long distance
- Caller ID, Call Waiting, and Voicemail

**1. Lifeline Unlimited Plan – Unlimited Anytime Minutes**

Retail cost	\$45.00
Lifeline discount	<u>- \$9.25</u>
<b>Net cost to Lifeline customer</b>	<b>\$35.75</b>

- Free phone
- Pre-paid
- No credit check, no deposit, no contract required
- Minutes do not rollover
- 1 incoming or outgoing text = 1 minute of voice

**2. Lifeline 150 Minute Plan – 150 Anytime Minutes**

Retail cost	\$15.00
Lifeline discount	<u>- \$9.25</u>
<b>Net cost to Lifeline customer</b>	<b>\$5.75*</b>

- Free phone
- \*Post-paid (Electronic billing at no additional charge; Paper billing incurs an additional charge of \$2.00 per month)
- No credit check, no deposit, 6-month contract required
- Minutes do not rollover
- 1 incoming or outgoing text = 1 minute of voice

**3. Lifeline Free 250 Minute Plan – 250 Anytime Minutes**

Retail cost	\$9.25
Lifeline discount	-\$9.25
<b>Net cost to Lifeline customer</b>	<b>\$0 (free)</b>

- Phone must be purchased separately
- No credit check, no deposit, no contract required
- Minutes do not rollover
- 1 incoming or outgoing text = 1 minute of voice

**4. Lifeline Free 100 Minute Plan – 100 Anytime Minutes**

Retail cost	\$9.25
Lifeline discount	-\$9.25
<b>Net cost to Lifeline customer</b>	<b>\$0 (free)</b>

- Free Phone
- No credit check, no deposit, no contract required
- Minutes do not rollover
- 3 incoming or outgoing texts = 1 minute of voice

**Additional Minutes**

35 Anytime Additional Minutes

\$5.00

75 Anytime Additional Minutes

\$10.00

160 Anytime Additional Minutes

\$20.00