

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of  Telecommunications Carriers Eligible to Receive Universal Service Support  Lifeline and Link Up Reform and Modernization  TX Mobile, LLC	WC Docket No. 09-197  WC Docket No. 11-42
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**TX MOBILE, LLC COMPLIANCE PLAN**

TX Mobile, LLC (“TX Mobile” or the “Company”),<sup>1</sup> through its undersigned counsel, hereby respectfully submits and requests expeditious treatment of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.<sup>2</sup>

The Company commends the Commission’s commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. The Company will comply with 911 requirements as described below and it is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities

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<sup>1</sup> The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: HTH Communications (affiliate). The Company does not have an operating company or a holding company.

<sup>2</sup> See *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*, 27 FCC Rcd 6656 (Feb. 6, 2012) (“*Lifeline Reform Order*”). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier (“ETC”) in the Lifeline program.<sup>3</sup>

The Company will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission’s Lifeline rules and policies more generally.<sup>4</sup> This Compliance Plan describes the specific measures that the Company intends to implement to achieve these objectives. Specifically, this Compliance Plan: (1) describes the specific measures that the Company will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company will follow in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low-Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how the Company will offer Lifeline services, the geographic areas in which it will offer services, and a detailed description of the Company’s Lifeline service plan offerings.

#### **ACCESS TO 911 AND E911 SERVICES**<sup>5</sup>

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and

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<sup>3</sup> See *Lifeline Reform Order*, ¶ 368. 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) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state 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, including in any state where the public utilities commission determines that TX Mobile provides service using its own facilities for purposes of a state universal service program.

<sup>4</sup> In addition, this Compliance Plan is consistent with the compliance plan filed by Global Connection Inc. of America. See Global Connection of America Inc. Compliance Plan, WC Docket Nos. 09-197, 11-42 (Apr. 30, 2012). The Global Connection compliance plan was approved on May 25, 2012. See Public Notice, DA 12-828.

<sup>5</sup> See Compliance Plan Public Notice at 3.

availability of minutes; and (2) 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.<sup>6</sup> The Company will comply with these conditions on the first day that it begins providing service.

The Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company 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 Company handsets, even if the account associated with the handset has no minutes remaining.

The Company will use Sprint and Verizon Wireless as its underlying wireless network providers/carriers. Sprint and Verizon will route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers. To the extent that these underlying wireless network providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. The Company will also enable 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company will transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

**E911-Compliant Handsets.** The Company will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. All of the Company's phones will be E911-capable handsets. The Company will use phones from suppliers that have been through a stringent certification process to ensure that the handset models used meet all 911 and

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<sup>6</sup> See *Lifeline Reform Order*, ¶ 373.

E911 requirements. As a result, any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

## COMPLIANCE PLAN

### **I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE<sup>7</sup>**

#### **A. Policy**

The Company will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC.

Therefore, except those in states where a state agency or state-designated administrator is responsible for determining subscriber eligibility, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

#### **B. Eligibility Determination**

Section 54.410(b)(1) of the FCC's rules states that, when complying with the requirement to determine a subscriber's initial eligibility for participation in the Lifeline program, an ETC may rely on the determination of a state agency or administrator if that agency or administrator is responsible for the initial determination of a Lifeline subscriber's eligibility. In Texas a single

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<sup>7</sup> See Compliance Plan Public Notice at 3.

administrator, Solix, Inc. (“Solix”), has been designated to determine consumers’ eligibility for Lifeline service. Accordingly, in Texas, TX Mobile will rely on Solix’s initial eligibility and subsequent verification of a consumer’s eligibility for participation in the Lifeline program.

In states without a state-designated Lifeline administrator TX Mobile will implement certification procedures that will enable prospective customers to demonstrate their eligibility by contacting TX Mobile either in person or by telephone, facsimile or over the Internet. In these states, TX Mobile will have contact with all prospective customers applying for Lifeline service, either in person through its employees or third party representatives, or by telephone or facsimile. Most applicants will be enrolled in person by TX Mobile employees at outdoor neighborhood events and special promotional events held by permission at neighborhood locations such as church parking lots. Prospective customers who do not complete TX Mobile’s Lifeline Application in person must return the signed document and eligibility documentation to TX Mobile by mail or facsimile. TX Mobile will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 U.S.C. §§ 7001-7006 and any applicable state laws.<sup>8</sup>

For any customers that TX Mobile enrolls over the phone and online, customers will be required to submit copies of their government-issued identification and proof of eligibility to the Company by regular mail, fax or electronic mail (scanned version).

As discussed in further detail in Section I.F. below, all TX Mobile personnel that conduct in-person enrollments will be trained regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company

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<sup>8</sup> 47 C.F.R. § 54.419.

personnel will undergo an initial mandatory training session where they are given training materials to review and understand.

If the Company cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company personnel will review documentation establishing eligibility pursuant to the Lifeline rules.<sup>9</sup> All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.<sup>10</sup> Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.<sup>11</sup>

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security

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<sup>9</sup> See *Lifeline Reform Order*, ¶ 100; 47 C.F.R. §§ 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B).

<sup>10</sup> See *Lifeline Reform Order*, ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

<sup>11</sup> *Id.*; 47 C.F.R. § 54.410(c)(1)(i)(B).

statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months time.<sup>12</sup>

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form.<sup>13</sup> In addition, Company personnel will fill in, where available, the last four digits of an account or other identifying number on the proof document, the date of the proof document and the expiration of the proof document. The Company will not retain a copy of this documentation, except where state rules require such retention.<sup>14</sup> For customers enrolled via the Internet, Facsimile, or USPS Mail, the customer will be required to fax or e-mail proof of eligibility documentation to the Company. Proof will be reviewed by Company personnel prior to service activation and then deleted. Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel at the Company's corporate headquarters.<sup>15</sup>

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<sup>12</sup> See *Lifeline Reform Order*, ¶101; 47 C.F.R. § 54.410.(b)(1)(i)(B).

<sup>13</sup> See *Lifeline Reform Order*, ¶101; 47 C.F.R. §§ 54.410(b)(1)(iii), 54.410(c)(1)(iii).

<sup>14</sup> See *Lifeline Reform Order*, ¶101; 47 C.F.R. §§ 54.410(b)(1)(ii), 54.410(c)(1)(ii).

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

De-Enrollment for Ineligibility. If the Company has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>16</sup> A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form. If a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within five business days. Customers can make this request by calling the Company's customer service number and will not be required to submit any documents.

### **C. Subscriber Certifications for Enrollment**

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.<sup>17</sup> The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. In states without a state-designated Lifeline administrator, applicants will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.<sup>18</sup> Applicants that seek to enroll based

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<sup>16</sup> See *Lifeline Reform Order*, ¶ 143; 47 C.F.R. § 54.405(e)(1).

<sup>17</sup> *Lifeline Reform Order*, ¶ 61; 47 C.F.R. § 54.410(a).

<sup>18</sup> See Model Application/Certification Form, included as Exhibit A. See Compliance Plan Public Notice at 3.

on income eligibility will be referred to a worksheet showing the Federal Poverty Guidelines by household size.<sup>19</sup> Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.<sup>20</sup>

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (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; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.<sup>21</sup>

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.<sup>22</sup>

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<sup>19</sup> See Income Eligibility Worksheet, included as Exhibit B.

<sup>20</sup> See *Lifeline Reform Order*, ¶ 123.

<sup>21</sup> See *id.*, ¶ 121; 47 C.F.R. §54.410(d)(1).

<sup>22</sup> See 47 C.F.R. § 54.405(c).

In addition, the Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.<sup>23</sup>

Information Collection. The Company will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient<sup>24</sup>); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>25</sup>

Applicant Certification. Consistent with new rule section 54.410(d)(3), the Company will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,<sup>26</sup> the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-

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<sup>23</sup> See *Lifeline Reform Order*, ¶ 257.

<sup>24</sup> See *id.*, ¶ 87.

<sup>25</sup> See 47 C.F.R. § 54.410(d)(2).

<sup>26</sup> See *Lifeline Reform Order*. ¶¶ 168-69; 47 C.F.R. § 54.419.

based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days; (5) if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize the Company to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit. The applicant must also authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.<sup>27</sup>

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<sup>27</sup> See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See *id.*

#### **D. Annual Verification Procedures**

The Company will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>28</sup> Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.<sup>29</sup>

ETCs are not required to conduct this annual re-certification in states where a state Lifeline administrator is responsible for re-certifications of subscriber Lifeline eligibility.<sup>30</sup> Solix is the USF administrator in Texas and is responsible for conducting eligibility re-certifications. Consequently, TX Mobile will not be required to conduct its own re-certification in Texas. In addition to administering the Lifeline eligibility confirmation and enrollment process in Texas, Solix conducts semiannual verifications of Lifeline subscribers' continued eligibility for participation in the Lifeline program. TX Mobile will rely on Solix's determination of a subscriber's continued eligibility to satisfy the Company's requirement to confirm initial and continued eligibility of Lifeline subscribers in Texas.

Verification De-Enrollment. The Company will de-enroll subscribers that do not respond to the annual verification or fail to provide the required certification.<sup>31</sup> The Company will give

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<sup>28</sup> See *Lifeline Reform Order*, ¶ 120.

<sup>29</sup> See *id.*, ¶ 145.

<sup>30</sup> 47 C.F.R. § 54.410(f)(1).

<sup>31</sup> See *id.*, ¶ 142; 47 C.F.R. § 54.54.405(e)(4).

subscribers 30 days to respond to the annual verification inquiry. If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, the Company will de-enroll the subscriber within five business days. In Texas, the Company will rely on any notice from Solix that a customer has failed to meet the re-certification requirements and should be de-enrolled.

#### **E. Activation and Non-Usage**

The Company will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by completing an outbound call. After being enrolled in TX Mobile's Lifeline service program, subscribers will be provided with a partially-activated handset and will be directed to activate the handset by completing an outbound telephone call.

In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.<sup>32</sup> Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from the Company to add to the subscriber's plan; (3) answering an incoming call from a party other than the Company; or (4) responding to a direct contact from the Company and confirming that the subscriber wants to continue receiving the service.<sup>33</sup>

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<sup>32</sup> See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3).

<sup>33</sup> See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. The Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>34</sup>

#### **F. Additional Measures to Prevent Waste, Fraud and Abuse**

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

In addition to checking the National Database when it becomes available, Company personnel will emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers. Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All Company personnel interacting with existing and potential Lifeline customers will undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order* and this Compliance Plan. Company personnel and agents that interact with customers must demonstrate understanding of the Commission’s and TX Mobile’s rules and policies by completing the Company’s Lifeline training. TX Mobile commits to ensuring employees and agents receive refresher training regarding changes to the Lifeline program and applicant qualification requirements.

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<sup>34</sup> See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3).

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, the Company will comply with the requirements of new rule section 54.404. The Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.<sup>35</sup>

One-Per-Household. The Company will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household<sup>36</sup> through the use of its application and certification forms discussed above, database checks and its marketing materials discussed below. In states without a state-designated Lifeline administrator, upon receiving an application for the Company’s Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.<sup>37</sup> If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission’s one-per-household

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<sup>35</sup> See *Lifeline Reform Order*, ¶ 203. The Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; section 54.404(b)(6). Further, the Company will update each subscriber’s information in the National Database within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10).

<sup>36</sup> A “household” is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See *Lifeline Reform Order*, ¶ 74; 47 C.F.R. § 54.400(h).

<sup>37</sup> See *Lifeline Reform Order*, ¶ 78.

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, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).<sup>38</sup> Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, the Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.<sup>39</sup>

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that all Lifeline services may not be currently marketed under the name Lifeline. TX Mobile will also ask each customer whether they are receiving Lifeline service from one of the other major Lifeline providers in the state (*e.g.*, SafeLink, Assurance).

Marketing Materials. The Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) TX Mobile's name (the ETC).<sup>40</sup>

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<sup>38</sup> *Id.* The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

<sup>39</sup> *See Lifeline Reform Order*, ¶ 89.

<sup>40</sup> *See Lifeline Reform Order*, ¶ 275; 47 C.F.R. § 54.405(c).

These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.<sup>41</sup> This specifically includes any Company website or outdoor signage.<sup>42</sup> A sample of the Company's marketing materials is included as Exhibit C. The Company's application/certification form will state that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

### **G. Company Reimbursements From the Fund**

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, the Company will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.<sup>43</sup> Further, the Company will submit its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month.<sup>44</sup>

In addition, the Company will keep accurate records as directed by USAC<sup>45</sup> and as required by new section 54.417 of the Commission's rules. For example, TX Mobile will keep the following records for each subscriber's individual Lifeline account, among other records, if applicable and as permitted: 1) date that TX Mobile queried the duplicates database; 2) date and information that TX Mobile transmitted to the duplicates database; 3) date of transmission of

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<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> *See Lifeline Reform Order*, ¶ 128; 47 C.F.R. § 54.407(d).

<sup>44</sup> *See Lifeline Reform Order*, ¶¶ 302-306.

<sup>45</sup> *See* 47 C.F.R. § 54.407(e).

updated customer information to database; 4) date and database upon which the ETC determined income-based eligibility where available; 5) date and documentation/data source used to determine income-based eligibility if no database was available to determine subscriber eligibility;<sup>46</sup> 6) date, database, and program on which ETC determined subscriber eligibility; 7) date and records detailing the documentation a subscriber provided to demonstrate Lifeline eligibility; 8) state Lifeline administrator documentation of customer eligibility, and subscriber's certification of eligibility; 9) date of customer service activation; 10) application/certification and annual re-certification forms for each subscriber associated with a date and time of signature; and 11) date of transmission of customer de-enrollment to database.

#### **H. Annual Company Certifications**

The Company will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that the Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;<sup>47</sup> (2) is in compliance with all federal Lifeline certification procedures;<sup>48</sup> and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.<sup>49</sup>

In addition, the Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).<sup>50</sup> In Texas, the

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<sup>46</sup> Such documentation includes the documentation listed in Section I.B. *supra*.

<sup>47</sup> See *Lifeline Reform Order*, ¶ 126; 47 C.F.R. § 54.416(a)(1).

<sup>48</sup> See *Lifeline Reform Order*, ¶ 127; 47 C.F.R. § 54.416(a)(2).

<sup>49</sup> See 47 C.F.R. § 54.416(a)(3).

<sup>50</sup> See *Lifeline Reform Order*, ¶¶ 132,148; 47 C.F.R. § 54.416(b).

Company's certification will include an attestation that the Company relied upon eligibility information obtained from Solix, Texas' USF administrator with responsibility for making eligibility determinations. TX Mobile will rely on Solix to provide the results of Solix's annual re-certifications/verifications on an annual basis to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands).<sup>51</sup> Further, as discussed above, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>52</sup>

The Company will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,<sup>53</sup> the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.<sup>54</sup> The Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low-income consumers 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>55</sup> Finally, the Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer

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<sup>51</sup> See *Lifeline Reform Order*, ¶¶ 132,148; 47 C.F.R. §54.416(b).

<sup>52</sup> See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3).

<sup>53</sup> See 47 C.F.R. § 54.422(c).

<sup>54</sup> See *Lifeline Reform Order*, ¶¶ 296, 390; 47 C.F.R. § 54.422(a).

<sup>55</sup> See *Lifeline Reform Order*, ¶ 390; 47 C.F.R. § 54.422(b)(5).

protection rules, as well as a certification that the Company is able to function in emergency situations.<sup>56</sup>

## **I. Cooperation with State and Federal Regulators**

The Company has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available, upon request, state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;<sup>57</sup>
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe<sup>58</sup> is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

## **II. Description of Lifeline Service Offerings<sup>59</sup>**

The Company will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying provider(s) Sprint Nextel (“Sprint”) and Verizon Wireless (“Verizon”). The Company’s Lifeline offerings will provide customers with a choice of three options:

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<sup>56</sup> See *Lifeline Reform Order*, ¶ 389; 47 C.F.R. § 54.422(b)(1)-(4).

<sup>57</sup> The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

<sup>58</sup> See 47 C.F.R. § 54.405(e)(1).

<sup>59</sup> See Compliance Plan Public Notice at 3.

1. 150 Anytime Minutes Plan. Eligible customers enjoy a free handset, 150 anytime minutes, rollover minutes, free incoming text messages, and free customer care calls.
2. 250 Anytime Minutes Plan. Eligible customers receive a free handset and 250 anytime minutes. Customers will not qualify for the perks listed above, forgoing these for a higher number of minutes.
3. Retail Discount Plan. The third option allows Lifeline eligible customers to choose from any TX Mobile monthly retail plan at a \$15 discount.<sup>60</sup> Under this Retail Discount Plan, a customer can, for example, pay \$10 additional per month and receive 200 anytime minutes, unlimited text messaging and 200 megabytes of data, plus all the perks listed under the 150 minute plan.

The Company's Lifeline plans will include domestic long-distance at no extra per minute charge and calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

### **III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation<sup>61</sup>**

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.<sup>62</sup> The Compliance Plan Public Notice requires that a carrier's compliance plan include this

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<sup>60</sup> Although TX Mobile's current discount offer is \$15, the Company may re-evaluate the discount applied to its retail plans based on the outcome of the FNRPM regarding a change in the federal Lifeline support amount. *See Lifeline and Link Up Reform Order* Section XIII.D. The Company commits to continue to offer a Lifeline discount at a minimum equal to the federal Lifeline support amount, plus any state funds, if applicable.

<sup>61</sup> *See Compliance Plan Public Notice* at 3.

<sup>62</sup> *See Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 47 C.F.R. §54.202(a)(4)).

demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

TX Mobile is a Texas limited liability company, with headquarters in Houston, Texas. The Company is not yet designated as an ETC in any states. Upon approval of this Compliance Plan, TX Mobile intends to seek designation as an ETC in states that have declined jurisdiction over wireless carriers. Specifically, the Company will seek designation in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, Virginia and the District of Columbia.

The Company is an affiliate of HTH Communications, an experienced and successful provider of wireless handsets, HTH's key management personnel also have experience in the wireless telecommunications service industry and are available to TX Mobile for guidance with respect to the provision of wireless telecommunications services.

TX Mobile is financially stable and fully capable of honoring its service obligations to customers as well as federal and state regulatory obligations. The Company has access to the financial resources of its affiliate and thus has access to sufficient capital to fund the Company. Consequently, the Company will not be relying exclusively on Lifeline reimbursements for its operating revenues. Finally, TX Mobile has not been subject to any enforcement action or ETC revocation proceeding in any state.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202

of the Commission's rules."<sup>63</sup> The Company certifies that it will comply with the service requirements applicable to the support the Company receives.<sup>64</sup> The Company will provide all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services will include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's service offerings will provide its customers with a set number of minutes of use for local service at no charge to the customer. The Company's proposed Lifeline offerings includes the package in Section II *supra* that can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, the Company will not provide toll limitation service ("TLS"). TX Mobile, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.<sup>65</sup>

#### **IV. Conclusion**

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<sup>63</sup> Compliance Plan Public Notice at 3.

<sup>64</sup> 47 C.F.R. § 54.202(a)(1).

<sup>65</sup> See *Lifeline Reform Order*, ¶ 230.

TX Mobile submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



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*Counsel to TX Mobile, LLC*

October 18, 2012

# EXHIBIT A

## Model Application/Certification Form



[State] Wireless Lifeline Service Application and Certification  
 Mail or fax form completed and signed form to:  
 TX Mobile, LLC  
 Attention: Lifeline Department  
 10516 Kipp Way, Suite C, Houston, TX 77099  
 Fax: (713) 534-1790/Customer Service: (713) 534-1950

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

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

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

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

- |   |  |
|---|--|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)   | <input type="checkbox"/> Income at or below 135% of Federal Poverty Guidelines       |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR)    |
| <input type="checkbox"/> Medicaid (not Medicare)                            | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA)           |
| <input type="checkbox"/> Supplemental Security Income (SSI)                 | <input type="checkbox"/> Tribally Administered TANF (TATNF)                          |
| <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)     | <input type="checkbox"/> Head Start (meeting income qualifying standards)            |
| <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) | <input type="checkbox"/> National School Lunch Program's free lunch program (Tribal) |

**Tribal eligibility:**

I hereby certify that I reside on Federally-recognized Tribal lands.

**Customer Application Information:**

First Name: \_\_\_\_\_ Middle Name: \_\_\_\_\_ Last Name: \_\_\_\_\_  
 Date of Birth: Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_ Last Four Digits of Social Security Number (or Tribal ID Number): \_\_\_\_  
 If Qualifying for Lifeline by Income, number of Individuals in Household: \_\_\_\_  
 Home Telephone Number (if available): \_\_\_\_\_

Residential Address (P.O. Box NOT sufficient)  
 Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_  
 State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Address is (choose one): o Permanent o Temporary

Billing Address (if different from Residential Address) (P.O. Box IS sufficient)  
 Number: \_\_\_\_\_ Apt: \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_  
 State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

**Multiple households sharing and address:**

I hereby certify that I reside at an address occupied by multiple households, including adults who do not contribute income to my household and/or share in my household's expenses, and I will complete a separate additional form.

**Activation and usage requirement disclosures:** This service is a prepaid service and you must personally activate it by calling or placing a call or text from your handset. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes from Company, answering an in-bound call from someone other than Company, or by responding to a direct contact from Company confirming that you want to continue receiving Lifeline service from Company. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to the Company's customer care center) subject to a 30 day cure period during which you may use the service (as described above) or contact the Company to confirm that you want to continue receiving Lifeline service from Company.

I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements.

**Authorizations:**

I hereby authorize the Company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize the Company to release any records required for the administration of the Lifeline program (including name, telephone number, address, date of birth, last four digits of Social Security number or Tribal Identification number, service initiation and termination dates, basis for subscriber eligibility and amount of support sought for subscriber), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

**Additional certifications:** I hereby certify, under penalty of perjury, that (check each box):

- I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required
- I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement
- I am not listed as a dependent on another person's tax return (unless over the age of 60)
- The address listed below is my primary residence, not a second home or business
- If I move to a new address, I will provide that new address to the Company within 30 days
- If I provided a temporary residential address to the Company, I will verify my temporary residential address every 90 days
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law
- I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits
- The information contained in this certification form is true and correct to the best of my knowledge

**Applicant's Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_

**For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed and provide information requested; do not copy or retain documentation):**

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

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

List B - Choose 1:

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

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

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Section 8 Federal Public Housing Assistance (FPHA)
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards)

Last 4 digits of Document from List B \_\_\_\_\_

Date of Proof Document: \_\_\_\_\_

Expiration Date of Proof Document: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Applicant Account Number	Rep/Agent Signature

# EXHIBIT B

## Income Eligibility Worksheet

## **TX Mobile Lifeline Service Application Income Eligibility Worksheet**

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

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

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

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

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

# EXHIBIT C

Sample Marketing Material

# **Wireless Phone Service**

## **Pay Nothing to Start Service**

250 Free Minutes every month for local  
and national long distance calls,  
Texting, and More!

TX Mobile

**If you or any other member of your household  
receive:**

**Medicaid - Food Stamps - TANF - SSI -  
Federal Housing Assistance - Low Income Energy –  
Head Start - School Lunch Program**

Lifeline is a government benefit program. Only eligible customers may participate in the Lifeline program and participation is limited to one benefit per household consisting of either wireline or wireless service. Documented proof of participation in a government assisted program or income qualification is required for enrollment. Lifeline service is non-transferable.

**713.534.1950**