

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Carriers Eligible to Receive Universal Service Support	)	WC Docket No. 09-197
	)	
Federal-State Joint Board on Universal Service	)	WC Docket No. 11-42
	)	
Prepaid Wireless Retail, LLC Compliance Plan	)	

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**PREPAID WIRELESS RETAIL, LLC'S  
COMPLIANCE PLAN**

Prepaid Wireless Retail, LLC, d/b/a Odin Mobile, hereby files its Compliance Plan providing specific information regarding Odin Mobile's service offerings and outlining the measures it has taken to implement the obligations contained in the *Lifeline Modernization Order*.<sup>1</sup> Pursuant to the *Lifeline Modernization Order*, the Federal Communications Commission (the "Commission") decided to forbear from applying the facilities requirement of section 214(e)(1)(A) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the "Act"), to telecommunications carriers seeking limited

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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*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 11-42; WC Docket No. 03-109; CC Docket No. 96-45; WC Docket No. 12-23 (rel. February 6, 2012) ("*Lifeline Modernization Order*").

designation as a Lifeline-only eligible telecommunications carrier (“ETC”), subject to the following conditions: (1) the carrier must comply with certain 911 requirements; and (2) the Commission must approve the telecommunication carrier’s compliance plan.<sup>2</sup>

Further the Commission explained that neither state commissions nor the Commission may grant additional Lifeline-only ETC applications after December 29, 2011, until the Bureau approves the telecommunications carrier’s compliance plan.<sup>3</sup> ETCs, however, may continue to receive reimbursement for Lifeline service “pending approval of their compliance plans in the states in which they currently serve Lifeline subscribers.”<sup>4</sup> The instant Compliance Plan is intended to satisfy the Commission’s requirement that Odin Mobile file, and the Commission approve, a compliance plan in order for the Commission to forbear from applying the facilities requirement of section 214(e)(1) of the Act with respect to Odin Mobile. This Compliance Plan includes all of the elements required by the Commission’s Public Notice, dated February 29, 2012.

## **I. BACKGROUND**

Odin Mobile’s mission is to provide unprecedented levels of service and value to persons who are blind and visually impaired. This mission is unique in the wireless industry. To the extent that any carrier makes an effort to address the needs of this community, it is as an afterthought. Odin Mobile, on the other hand, will make accessibility its primary mission.

Odin Mobile will implement its mission in a number of ways, including selling handsets with the very best accessibility features, insuring that its website is fully accessible, describing in

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<sup>2</sup> See *id.* at ¶ 368.

<sup>3</sup> See *id.* at ¶ 380.

<sup>4</sup> See *id.*

detail on its website the accessibility features of its handsets so that its customers have the required information to make informed decisions, and providing its customer service representatives with the unique skills and knowledge required to serve the needs of its customers.

Moreover, Odin Mobile will not passively accept and sell handsets that are already sold in the market. It will work tirelessly with manufacturers to innovate and develop new handsets, including smart phones, which improve ease-of-use, offer applications and digital content that benefit the blind and visually impaired and expand accessibility. Further, Odin Mobile will operate on T-Mobile's GSM network, which will provide the company a much larger pool of handsets and manufacturers from which to select and develop devices that are accessible.

Odin Mobile was formed on September 14, 2012. Its holding company is Prepaid Wireless Group, LLC ("PWG"). PWG is owned, either directly or indirectly primarily by four individuals, none of whom hold a majority interest in PWG.<sup>5</sup> In addition, Odin Mobile has a sister company, Prepaid Wireless Wholesale, LLC ("PWW"). PWW offers wholesale GSM services on T-Mobile's network. Its customers include providers that offer both Lifeline and non-Lifeline services. Moreover, Odin Mobile has the following additional affiliates: (1) Cintex Group, LLC ("Cintex Group"), and (2) Cintex Wireless, LLC ("Cintex Wireless"). Cintex Wireless provides retail services on Sprint's CDMA network, while Cintex Group provides wholesale services on Sprint's CDMA network. Cintex Wireless and Cintex Group are affiliated with Odin Mobile by virtue of the fact that they have common ownership as set forth in Section 3(1) of the Communications Act of 1934, as Amended.<sup>6</sup>

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<sup>5</sup> In addition, a small number of employees will receive minor equity interests in PWG.

<sup>6</sup> 47 U.S.C. § 153(1).

Odin Mobile is both financially and technically capable of providing Lifeline service.<sup>7</sup> In the first instance, Odin Mobile anticipates that the significant majority of its revenue will be generated from non-lifeline sources. To be clear, Odin Mobile's service is a non-lifeline service. Lifeline will simply make the service more affordable to lower income individuals. In the second instance, Odin Mobile's affiliates will generate substantial revenue from sources other than reimbursements from the Universal Service Administrative Company. Specifically, both Cintex Group and PWW will generate substantial revenue from wholesale services. Technical capability is demonstrated by the fact that (i) its executives have many years of experience in the telecommunications industry, (ii) BeQuick Software, Inc. provides its back-end support, and (iii) CGM, LLC will provide it with compliance services.

On December 7, 2012, Odin Mobile filed with the Commission, a Petition of Prepaid Wireless Retail, LLC for Designation as an Eligible Telecommunications Carrier on a Wireless Basis in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, Texas and Virginia. Odin Mobile has not yet filed petitions to be designated an ETC with any state commission but will do so in the near future.

## **II. CERTIFICATION OF LIFELINE APPLICANTS' ELIGIBILITY**

### **A. Policy**

Odin Mobile will seek reimbursement for Lifeline service only for those consumers who qualify for Lifeline service pursuant to Commission rule 54.409, or who qualify under additional program or income criteria adopted by the states. In addition, Odin Mobile will comply with the Commission's requirements for initial eligibility certification and annual eligibility re-certification.

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<sup>7</sup> 47 C.F.R. § 54.202(a)(4).

## **B. Initial Eligibility Certification Procedures**

Odin Mobile is committed to the integrity of the Lifeline program and will implement certification procedures consistent with Commission rule 54.410 to ensure that its subscribers qualify for Lifeline.

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

Therefore, 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 Commission rule 54.409(a)(2) or 54.409(a)(3). The manner in which each subscriber is eligible is captured by Odin Mobile in two locations: (1) on the application forms for Lifeline services; and (2) in Odin Mobile's back-end system, called "Fusion," which was developed, and is managed, by BeQuick Software, Inc. ("BeQuick"). In addition, through the certification requirements and other policies described below, Odin Mobile 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.

*Marketing material.* Odin Mobile marketing material, including its website, will include detailed information regarding its Lifeline plans and eligibility criteria. Eligibility criteria will reflect those set forth in the *Lifeline Modernization Order*, and may also include eligibility criteria established by the states, if applicable. All Odin Mobile employees and representatives, who are involved in enrolling Lifeline subscribers, will undergo training regarding the eligibility

criteria. In addition, all documentation, including marketing material, sales scripts, websites and applications, will reflect the eligibility criteria.

All Odin Mobile marketing material will also explain in easily understood language that the offering is a Lifeline supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and that the program is limited to one benefit per household, consisting of either wireline or wireless service. The marketing material will also explain that Lifeline is a government benefit program and 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. Additionally, Odin Mobile marketing material will disclose the details of its Lifeline offering, as well as always make it clear that Odin Mobile is the carrier that will provide the Lifeline service. Odin Mobile's marketing group will be trained regarding these marketing disclosure requirements.

Odin Mobile marketing material, as well as its communications with its customers generally, will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service. All Odin Mobile marketing material will be reviewed by its attorney prior to use.

*Certification form and supporting documentation.* Attached as Exhibit 1 is a copy of the Odin Mobile's certification form. Every applicant will be required to complete a certification form<sup>8</sup> or enroll over the phone. Applicants that do not complete the form in person will be required to submit a completed and signed certification form to Odin Mobile by mail, facsimile,

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<sup>8</sup> Odin Mobile uses certification forms in both paper and electronic form. Electronic certification forms are presented to applicants on tablets during the in-person sales process. The forms were developed by CGM, LLC ("CGM") and are fully integrated into Fusion, Odin Mobile's back-end system. The tablet also allows the sales person to do a real time duplicate check, as well as verify applicant eligibility with certain state databases.

electronic mail or other electronic transmission, inclusive of the documentation. If an applicant enrolls over the phone, the applicant will be led through the same certification process as contained in the tablet application developed by CGM. Odin Mobile will use the documentation to verify a consumer's eligibility to receive Odin Mobile's lifeline service, unless a state database or state agency verifies eligibility. Applicants can present the documentation in person or send it to Odin Mobile by email or mail.

Odin Mobile's certification form provides information, requests information and requires that each applicant make certain certifications, consistent with Commission rule 54.410(d). The certifications will be explained to consumers when they enroll in person or over the phone.

All certification forms and supporting documentation will be reviewed by Odin Mobile employees, who will determine whether the supporting documentation is sufficient to establish income-based qualification or program-based qualification. The supporting documentation must be of a type identified in Commission rule 54.410(c)(1)(i)(B) or 54.410(c)(1)(iii). Odin Mobile will not provide Lifeline service to consumers who have not provided such documentation, unless their eligibility has been confirmed by a federal or state database or by a state agency. Odin Mobile will not retain the documentation.

Odin Mobile anticipates that because its customers are blind, the large majority of applicants will certify over the phone. The calls will be recorded and the recordings attached to each applicant's account so that they can be retrieved easily in the event of an audit.

For applications in which Odin Mobile receives documentation proving eligibility, Odin Mobile captures certain information related to that documentation in order to demonstrate, in the event of an audit, that it has reviewed the documentation. Specifically, Odin Mobile captures the following: (i) the type of documentation reviewed, (ii) the date or expiration date of the

documentation (where available), (iii) the date the documentation was reviewed, (iv) the manner in which the documentation was provided (e.g., in person, fax . . . etc), (v) the ID of the employee who reviewed the documentation, and (vi) the name on the documentation.

Significantly, all documentation is reviewed by Odin Mobile employees who are compensated on an hourly basis. Accordingly, the employees are not rewarded in any way for approving more applications.

*Face-to-face sales and inquiries to Odin Mobile customer care.* In the case of face-to-face sales and inquiries to Odin Mobile customer care regarding the Odin Mobile Lifeline service and applicable eligibility criteria, all Odin Mobile representatives will be trained to assist Lifeline applicants determine whether they are eligible to participate in Lifeline. These persons will be trained to answer questions regarding eligibility criteria and the definition of a “household” (i.e., what constitutes a “household”). All documentation collected by Odin Mobile representatives engaged in face-to-face sales will be reviewed at Odin Mobile headquarters to double check its validity. Odin Mobile does not rely on agents or contractors to perform this review on its behalf. Notwithstanding the above, however, Odin Mobile does not anticipate acquiring many customers through face-to-face sales. Rather, most of its customers will be acquired through highly respected associations such as the congressionally chartered Blinded Veterans Association.

In addition, Odin Mobile representatives will verbally ask each applicant whether they or anyone else in their household currently receive Lifeline support from any other telephone provider. If the applicant answers in the affirmative, the applicant will be informed that they are not eligible for the Odin Mobile Lifeline offering. Odin Mobile representatives will also explain to applicants that if they do not use their Lifeline service for 60 consecutive days, their service

may be deactivated and that customers must recertify their eligibility each year. However, the usage requirements will not apply to the majority of Odin Mobile's customers who will subscribe to plans with monthly fees. As noted previously, the certification process followed for in-person sales, if any, will include a tablet application developed by CGM.

*Eligibility database or state agency.* Where available, Odin Mobile will verify a subscriber's eligibility by accessing a federal or state database or through a state agency. In these cases, Fusion will dip into the relevant database real time in order to confirm eligibility. If eligibility cannot be confirmed by the database, an error message is generated and the applicant cannot be enrolled in Lifeline. Further, if a state or federal database is used, Fusion will capture the following information for each customer: (i) the name of the database queried, (ii) the date the database was queried, and (iii) confirmation by our employee that the database confirmed eligibility. Alternately, if a state agency confirmed eligibility, Fusion will capture the following: (i) the name of the agency consulted, (ii) the agency contact, and (iii) a copy of the notice provided by the agency that confirms eligibility.

If a database or state agency is not available to confirm eligibility, Odin Mobile will require the consumer to provide documentation proving eligibility. Odin Mobile will not provide Lifeline service or seek reimbursement from the USAC for ineligible applicants.

*De-enrollment for ineligibility.* If Odin Mobile has a reasonable basis to believe that one of its Lifeline customers no longer meets the eligibility criteria, Odin Mobile will notify the customer of impending termination in writing via email or letter and provide the subscriber 30 days to demonstrate continued eligibility. The message will include the following language: "URGENT: we have reason to believe that you no longer qualify for your Odin Mobile Lifeline service. If you do not contact Odin Mobile at 877-304-9183, and confirm your eligibility, your

Lifeline service will be terminated in 30 days.” A demonstration of eligibility must comply with the annual verification procedures found in new rule 54.410(f), including the submission of a completed and signed certification form.

Furthermore, in the event that a customer requests that Odin Mobile deactivate their Lifeline service, Odin Mobile will do so immediately. The 30-day notice period will not apply to such requests.

### **C. Annual Eligibility Re-Certification**

Odin Mobile will attempt to re-certify all subscribers enrolled in its Lifeline program on an annual basis. For 2013, Odin Mobile may elect to have USAC administer the re-certification process on its behalf. If Odin Mobile recertifies its customers itself, it will do so by accessing a federal or state database, if available. If a database is not available, Odin Mobile will obtain from the consumer a signed certification, consistent with Commission rule 54.410(d). The re-certification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline service and that if the customer fails to respond, he or she will be de-enrolled from the program. Odin Mobile anticipates that the majority of its subscribers will recertify by IVR or through recorded calls from Odin Mobile customer service. The IVR “results” will be passed into fusion, and recordings of phone calls will be attached as WAV files to each customer’s account. Odin Mobile will also provide its subscribers the option of recertifying via the web.

Odin Mobile will make applicants aware of the re-certification requirement (i) at the point of sale, (ii) on the certification form, (iii) on its website, and (iv) on telephone calls used to certify customers. With respect to the point of sale, Odin Mobile will train its representatives who perform face-to-face sales to make applicants aware of the re-certification requirement.

Odin Mobile will initiate a de-enrollment process for those subscribers that it or USAC is unable to re-certify. Pursuant to this process, Odin Mobile will send subscribers, via postcards or email, notification of impending termination. Odin Mobile will provide subscribers 30 days following the date of the written notification, in which to demonstrate ongoing eligibility for Lifeline. If the customer fails to demonstrate eligibility within this time frame, Odin Mobile will de-enroll the customer within five business days after expiration of the subscriber's time to respond to the re-certification efforts.

If Odin Mobile cannot verify addresses via a state or federal database, Odin Mobile will contact each subscriber to obtain a valid address; Odin Mobile will do so during the annual certification process.

### **III. MEASURES TO PREVENT DUPLICATE LIFELINE BENEFITS**

Odin Mobile is committed to minimizing waste, fraud and abuse in the Lifeline program. Accordingly, in order to prevent duplicate Lifeline benefits, Odin Mobile will, consistent with Commission rule 54.404, query either the National Lifeline Accountability Database or a state database that has been approved by the Commission. Such queries will determine whether a subscriber, or someone else at his or her residential address, is currently receiving a Lifeline benefit. If the applicant is already receiving a Lifeline benefit at that address, Odin Mobile will not seek Lifeline benefits for that applicant unless and until the consumer de-enrolls from the ETC from whom they are receiving service. If another person at the applicant's residential address is currently receiving Lifeline supported service, Odin Mobile will require the applicant to complete a "separate -household" document in order to demonstrate that the applicant and the current subscriber are part of separate households. Similar to proof of eligibility, the worksheet can be sent to Odin Mobile via fax, email or mail.

Significantly, even after the National Lifeline Accountability Database is operational, Odin Mobile will continue to implement a multi-faceted approach to minimizing duplicate Lifeline service. Odin Mobile's certification form, marketing material and in-person contacts will all emphasize the one per-household requirement. In addition, Odin Mobile will continue its internal database checks, even as it uses the National Lifeline Accountability Database.

In order to minimize duplicate Lifeline benefits prior to when the federal or state databases become available, Odin Mobile will implement **four** measures.

*First*, each applicant will be required to certify under penalty of perjury that the subscriber's household will receive only one Lifeline benefit and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline benefit.

*Second*, in face-to-face sales, as well as during phone calls, Odin Mobile representatives will ask the applicant the following: "Do you or anyone else in your household currently receive Lifeline support from any other telephone provider?" If the applicant answers "yes," he or she will not receive Lifeline service from Odin Mobile.

*Third*, all certification forms received by Odin Mobile will be reviewed to verify whether the applicant, or whether anyone at the applicant's address, is currently receiving Lifeline benefits from Odin Mobile or another ETC that is a client of CGM.

All Odin Mobile representatives who perform face-to-face sales will have tablets or computers on site and will check Odin Mobile's internal database, as well as CGM's database, to identify duplicate certifications on a real-time basis. If the applicant is already receiving a Lifeline benefit at that address he or she will not be enrolled in Lifeline, and Odin Mobile will not seek an additional Lifeline benefit for that applicant. If another person at the applicant's

residential address is currently receiving Lifeline supported service, Odin Mobile will require the applicant to complete a “separate household” worksheet in order to demonstrate that the applicant and the current subscriber are part of separate households.

*Fourth*, as explained above, Odin Mobile’s marketing material will reinforce the limitation of one Lifeline phone per household. The following language will appear on the Odin Mobile website and in marketing materials in bold and in an offsetting color to ensure that it is not overlooked:

**Note: By law, the Lifeline program is only available for one phone per household.**

In the event that Odin Mobile learns from the National Lifeline Accountability Database, USAC, the Commission, a state commission, the customer, or through its own database, that a household is receiving more than one Lifeline benefit, the affected customer will be de-enrolled within five business days and Odin Mobile will not seek Lifeline reimbursement for service provided following the date of that customer’s de-enrollment.

#### **IV. COOPERATION WITH STATE AND FEDERAL REGULATORS**

Odin Mobile will cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, Odin Mobile will:

- Make available subscriber data to USAC in order to help it create and maintain the National Lifeline Accountability Database;
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing 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 subscribers already receives Lifeline service from another carrier; and
- De-enroll within the applicable time period, any subscriber whom Odin Mobile has a reasonable basis to believe is receiving Lifeline-supported service from another ETC or knows is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.

Odin Mobile will do everything possible to maintain good relations with state commissions. For example, the company will respond timely to customer complaints and to any inquiries by the state commissions.

#### **V. NON-USAGE REQUIREMENTS**

If a subscriber fails to “use” an Odin Mobile Lifeline plan for 60 consecutive days, Odin Mobile will provide the subscriber 30 days’ written notice via text message, using clear, easily understood language, that the subscriber’s failure to use the Lifeline service within a 30-day notice period will result in termination of lifeline service. The text messages are sent out daily. A subscriber will be considered to have used the Lifeline service if he or she (i) completed an outbound call, (ii) purchased minutes from Odin Mobile to add to the subscriber’s service plan, (iii) answered an incoming call from a party other than Odin Mobile or Odin Mobile’s agent or representative; or (iv) responded to direct contact from Odin Mobile and confirms that he or she wants to continue receiving Lifeline service. If the subscriber uses the Lifeline service within 30 days of the Odin Mobile notice, Odin Mobile will not terminate the subscriber’s Lifeline service. To avoid waste, Odin Mobile will not seek Lifeline support for subscribers who have not used the service for a consecutive 60-day period, unless the subscriber uses the service within 30 days

of the carrier providing notice of de-enrollment. This usage requirement, however, will not apply to customers who make a monthly payment; Odin Mobile anticipates that the majority of its customers, including its Lifeline customers, will make monthly payments.

Odin Mobile will make subscribers aware of this usage requirement and its impact on their Lifeline service, if any, in marketing material, its website, its certification, when subscribers call customer service for information on the Odin Mobile Lifeline program and in face-to-face sales.

In addition, Odin Mobile will not seek Lifeline support for a customer unless and until the subscriber activates the service and/or completes an outgoing call.

## **VI. ACCESS TO 911 AND E911 SERVICES**

Odin Mobile will provide its Lifeline subscribers with access to 911 and E911 services inasmuch as these services have been deployed by its underlying carriers. Further, Odin Mobile will transmit a Lifeline subscriber's wireless 911 call, regardless of whether the subscriber has failed to satisfy the usage requirements and regardless of whether the account associated with the handset has been terminated. Odin Mobile will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service.

Odin Mobile will provide its Lifeline subscribers with E911-compliant handsets and replace, at no additional charge to its subscribers, noncompliant handsets of Lifeline-eligible customers.

Odin Mobile has the same ability to remain functional in emergency situations as its underlying carriers.

## VII. ODIN MOBILE SERVICE OFFERINGS

Lifeline and non-Lifeline customers will have access to the same plans.<sup>9</sup> The Lifeline monthly price will simply be the standard price, less \$10.00. Odin Mobile will not offer a Lifeline-only plan. Odin Mobile will not charge its Lifeline customers a number portability charge<sup>10</sup> or an activation fee.<sup>11</sup> Customers, whether or not receiving Lifeline service, can select a handset designed for persons who are blind or have low vision. The customer will have to pay for the cost of the handset; Odin Mobile's handsets are too expensive to be provided free of charge. The service will include caller ID, call waiting, call forwarding, 3-way calling and voicemail. All plans include domestic long-distance at no extra cost per minute. Calls to 911 emergency services are free, regardless of service activation or availability of minutes.

Odin Mobile certifies that its voice telephony services comply with the requirements of Commission rule 54.101. In particular, Odin Mobile provides voice grade access to the public switched network; minutes of use for local service at no additional charge; and access to emergency services provided by local government or other public organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.

The only toll service offered by Odin Mobile is international toll service. Lifeline Customers will have the option to shut off their international service or cap the maximum amount that they can spend at a certain amount. Both of these methods will provide customers control over the amount that they spend on toll service.

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<sup>9</sup> Odin Mobile's rate plans are available at [www.odinmobile.com](http://www.odinmobile.com).

<sup>10</sup> 47 C.F.R. § 54.401(e)(2012).

<sup>11</sup> Non-Lifeline customers will be charged an activation fee.

The terms and conditions of the Odin Mobile Lifeline service will be posted on the Odin Mobile website at [www.odinmobile.com](http://www.odinmobile.com).

#### **VIII. REIMBURSEMENT FROM THE FUND**

To ensure that Odin Mobile does not seek reimbursement from the Universal Service Fund without a customer's consent, Odin Mobile 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 customers for whom it is seeking reimbursement. In addition, Odin Mobile will keep accurate records as directed by USAC and as required by Commission rule 54.417.

#### **IX. ANNUAL COMPANY CERTIFICATIONS**

Odin Mobile will submit an annual certification to USAC, signed by a company officer under penalty of perjury, that Odin Mobile: (1) has policies and procedures in place to review consumers' proof of eligibility documentation and ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) is in compliance with all federal lifeline certification procedures; and (3) has obtained a valid certification form for each subscriber for whom Odin Mobile seeks Lifeline reimbursement.

In addition, Odin Mobile will provide the results of its annual recertification/verifications to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands) on an annual basis. Further, as discussed above, Odin Mobile will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.

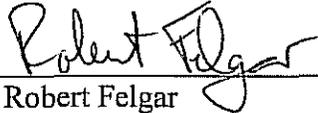
To the extent required, Odin Mobile will also annually report to the Commission, USAC, and the relevant state commissions and the relevant authority in a U.S. territory or Tribal

To the extent required, Odin Mobile will also annually report to the Commission, USAC, and the relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate, the company name, holding company, operating companies and affiliates, and any branding (such as a “dba”) as well as relevant universal service identifiers for each entity in the Study Area Code. Odin Mobile will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered 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/or toll calls. Finally, Odin Mobile will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certifications of compliance with applicable service quality standards and consumer protection rules, as well as a certification that Odin Mobile is able to function in emergency situations.

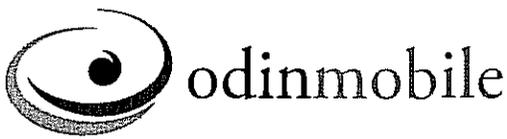
Odin Mobile submits that its Compliance Plan fully satisfies the requirements set forth in the *Lifeline Modernization Order*. Accordingly, Odin Mobile respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,

PREPAID WIRELESS RETAIL, LLC

By:   
Robert Felgar  
General Counsel  
1800 I Rockville Pike  
Rockville, Maryland 20852

March 5, 2013



This signed authorization is required in order to enroll you in the Lifeline Program in your state. The information contained in this application may be provided to a government agency or another telephone company to confirm your right to participate in the Lifeline Program.

Things to know about the Lifeline Program:

- (1) Lifeline is a federal benefit.
(2) Willfully making false statements to obtain Lifeline benefits can result in fines, imprisonment, de-enrollment or being barred from the program.
(3) Lifeline service is available for only one line per household.
(4) 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.
(5) Households are not permitted to receive benefits from multiple providers.
(6) Violation of the one-per-household limitation violates the law and will result in your de-enrollment from the program.
(7) I understand Lifeline service is a non-transferable service, and that I may not transfer my service to any other individual, including another eligible low-income consumer.

Applicant Information

First Name: MI: Last Name:
Social Security Number (last 4 digits): Contact Telephone Number: Date of Birth:
Physical Address (no P.O. Boxes, Must be your principal address): Is this a temporary address? Yes: No: Email Address:
Street Address: APT/Floor: City:
State: ZIP Code:

\* I hereby certify that I participate in at least one of the following programs:
Initial Here

Is this a multiple household address? Yes No

- Medicaid (not Medicare) Supplemental Security Income (SSI)
Federal Public Housing Assistance (Section 8) Aid to Families with Dependent Children (AFDC)
Low-Income Home Energy Assistance Program (LIHEAP) General Public Assistance (GPA)
National School Lunch Program (Free Program Only) Supplemental Nutrition Assistance Program (SNAP)/Food Stamps
Temporary Assistance For Needy Families (TANF) Rhode Island Pharmaceutical Assistance Program

OR

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

I live on Tribal Lands and participate in one of the following programs:

- Bureau of Indian Affairs General Assistance Head Start (only households meeting its income qualifying standard)
Tribally Administered Temporary Assistance for Needy Families Food Distribution Program on Indian Reservations

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

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

- \* (1) The information contained in my application is true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
\* (2) That I am a current recipient of the above program, or have an annual household income at or below 135 percent of the Federal Poverty Guidelines.
\* (3) If I provided documentation proving eligibility, and the name on the documentation is not mine, I certify that that individual is part of my household.
\* (4) I attest to the best of my knowledge that no one in my household is receiving a Lifeline supported service, and that I understand that I can only receive one Lifeline subsidy.
\* (5) I understand that if I do not use my phone in a sixty (60) day period, I may be de-enrolled from the Lifeline program.
\* (6) I will notify Odin Mobile within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:
(1) I cease to participate in the above federal or state program, or my annual household income exceeds 135% Federal Poverty Guidelines.
(2) I am receiving more than one Lifeline supported service.
(3) Another member of my household is receiving a Lifeline benefit.
\* (7) I will notify Odin Mobile within thirty (30) days of moving and provide Odin Mobile my new address.
\* (8) I authorize Odin Mobile to release any records required for the administration of the Odin Mobile Lifeline program (including my full name, address, date of birth and last four digits of my social security number), 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.
\* (9) I understand that I may be required to re-certify my continued eligibility for Lifeline at any time, and that my failure to re-certify will result in de-enrollment from the Odin Mobile Lifeline service.
\* (10) I understand that if USAC identifies me as receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other. I further understand that some states may impose more stringent rules including, but not limited to, barring me from re-enrolling in the program.

Applicant's Signature

Date