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March 7, 2013

By ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TelOps International, Inc. d/b/a AmTel, Revised Compliance Plan;
WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On July 2, 2012, TelOps International, Inc. d/b/a AmTel (“AmTel” or the “Company”) submitted its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.¹ AmTel submitted revised versions of its Compliance Plan on October 26, 2012 and November 30, 2012.

AmTel has further revised its Compliance Plan to: (1) explain how AmTel meets its obligation to “deal directly” with Lifeline applicants (pp. 7-8); (2) explain that AmTel will review applicants’ government-issued photo identification during the enrollment process (pp. 8, 9); (3) clarify the Company’s process for de-enrollment of customers that fail to respond to the annual eligibility verification (p. 13) and (4) provide updated Lifeline subscriber count information (p. 2). AmTel also revised its sample application forms to clarify the timeframe applicable to proof of income. Nothing else in the Compliance Plan has changed.

¹ 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*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, FCC 12-11 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Ms. Marlene H. Dortch, Secretary
March 7, 2013
Page Two

AmTel hereby submits its complete Compliance Plan with the above revisions and, based on the minor nature of these edits, reiterates its request for the expeditious approval of its Compliance Plan. Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,



John J. Heitmann
Denise N. Smith

*Counsel to TelOps International, Inc. d/b/a
AmTel*

cc: Garnet Hanly
Jonathan Lechter
Alex Minard
Michelle Schaefer

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

In the Matter of

Lifeline and Link Up Reform and
Modernization

Telecommunications Carriers Eligible to
Receive Universal Service Support

TelOps International, Inc. d/b/a AmTel (AmTel)

WC Docket No. 11-42

WC Docket No. 09-197

**REVISED COMPLIANCE PLAN OF
TELOPS INTERNATIONAL, INC. D/B/A AMTEL (AMTEL)**

TelOps International, Inc. d/b/a AmTel (“AmTel”), through its undersigned counsel, hereby seeks to avail itself of the Federal Communications Commission’s (“Commission’s”) grant of forbearance from the “own facilities” requirement set forth in 47 U.S.C. § 214(e)(1)(A) by submission of this Compliance Plan.¹ AmTel’s Compliance Plan is filed in accordance with the procedures established in the *Lifeline Reform Order*² and clarified in the *Public Notice* issued by the Wireline Competition Bureau on February 29, 2012.³

AmTel respectfully requests expeditious approval of its Compliance Plan so that the Company may continue to provide essential Lifeline service to eligible low-income customers in

¹ The Company hereby also reports its corporate and trade names, identifiers, and its holding company, operating companies and affiliates as: AmTel (trade name), Aeon Transportation LLC and Sanchez Insurance Tax & More LLC (affiliates). The Company does not have a holding or operating company.

² See *Lifeline and Link Up Reform and Modernization et al.*, 27 FCC Rcd 6656 (2012) (“Lifeline Reform Order”).

³ Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order, Public Notice, DA 12-314 (WCB rel. Feb. 29, 2012) (“Public Notice”).

states where it has been designated an ETC and so that it may provide service to additional eligible low-income consumers in the various states for which it has pending ETC petitions.

As set forth below, AmTel will fully comply with all conditions set forth in the Commission's recently amended Lifeline rules and with all pertinent conditions set forth in the *Lifeline Reform Order*. This Compliance Plan describes the measures AmTel has already implemented or intends to implement to achieve full compliance with the Commission's Lifeline rules and policies. For the convenience of the Commission, this Compliance Plan follows the format established by the Wireline Competition Bureau in the *Public Notice*.

I. INFORMATION ABOUT AMTEL AND THE LIFELINE PLANS IT OFFERS

A. Company Information

AmTel is a Texas corporation with headquarters in Corinth, Texas. The Company's President is Mark McWhirter. The Company has no subsidiaries and operates under the name "AmTel." AmTel has no affiliates that participate in the Lifeline program or any other federal universal service program.

B. AmTel's Financial and Technical Capabilities to Provide Lifeline Service

AmTel was designated as a facilities-based, wireline Eligible Telecommunications Carrier ("ETC") in the state of Arkansas on March 25, 2010, and in the state of Oklahoma on March 26, 2009. AmTel was also designated as a wireless ETC by the Arkansas Public Service Commission on May 24, 2011.

The Company has been providing wireline Lifeline services in Arkansas since November 2009 and has been providing wireless services in Arkansas since June 2011. AmTel has been providing wireline Lifeline services in Oklahoma since July 2010. The Company currently has approximately 14,150 Lifeline customers in Oklahoma and Arkansas.

AmTel currently has an application for ETC designation pending before the Louisiana Public Service Commission to provide wireless Lifeline-only services. AmTel did not seek, and will not accept, High Cost support in any of the states for which it has been designated an ETC or for which it may have a pending ETC application.

AmTel is successfully providing Lifeline-supported services in the various states where it has received ETC designation and has a steadily increasing customer base. AmTel uses Sprint as the underlying network provider/carrier for AmTel's provision of wireless services. The Company uses a combination of its own switching facilities⁴ and the resale of AT&T's services to provide its wireline services.⁵

AmTel is financially stable and fully capable of honoring its service obligations to customers, as well as federal and state regulatory obligations. Although AmTel derives revenues from the sale of Lifeline services, the Company does not rely exclusively on USF disbursements to operate. In addition to non-Lifeline wireline services, the Company derives additional revenue from the sale of wireless services beyond its free Lifeline offerings, including the sale of optional service packages (*e.g.*, Internet/text services).

Finally, AmTel has not been subject to any enforcement action or ETC revocation proceeding in any state.

⁴ The Company reserves the right to utilize its own facilities for the provision of voice telephony for purposes of state universal service funding under state program rules and requirements.

⁵ 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 AmTel provides service using its own facilities for purposes of a state universal service program.

C. Geographic Area of AmTel's Service Offerings

AmTel is a wireless Lifeline-only ETC designated as such by the State of Arkansas and a wireline Lifeline ETC designated by the States of Arkansas and Oklahoma. The Company also has a Lifeline-only wireless ETC application pending in Louisiana.

D. AmTel's Lifeline Service Plans

Exhibit 1 to this Compliance Plan contains the Company's Lifeline offerings.

E. Other Certifications Required by 47 C.F.R. § 54.202

The *Public Notice* requires carriers to include certifications required under newly amended 47 C.F.R. § 54.202. AmTel hereby certifies that it will comply with the service requirements applicable to the support it receives.⁶ Specifically, AmTel's Lifeline services: (i) include voice telephony services that provide voice grade access to the public switched network or its functional equivalent; (ii) provide subscribers with a defined number of minutes of usage for local service at no additional charges (as described above in Section I(D)); (iii) provide subscribers with access to the emergency services provided by local government or other public safety organizations, such as 911/E911, to the extent the local government in AmTel's service area has implemented 911/E911 systems (as described below in Section III); and (iv) toll limitation for qualifying low-income consumers.⁷

⁶ 47 C.F.R. § 54.202(a)(1)(i).

⁷ 47 C.F.R. § 54.101(a); Toll limitation means both toll blocking and toll control, or, if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control. AmTel provides toll limitation service ("TLS") to its Lifeline customers at no cost, which allows low-income consumers to avoid unexpected toll charges. AmTel will not provide toll limitation service for its wireless service offerings. AmTel, like most wireless carriers, does not differentiate between domestic long distance toll usage and local usage and all usage is paid in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS. See *Lifeline Reform Order*, ¶230.

II. AMTEL'S PLANS FOR COMPLIANCE WITH NEW COMMISSION RULES RELATING TO DETERMINATIONS OF SUBSCRIBER ELIGIBILITY FOR LIFELINE SERVICES

AmTel will comply with the requirements pertaining to consumer qualifications for Lifeline set forth in new section 54.409 of the Commission's rules⁸ and any state-specific requirements in the various states in which AmTel has been (or will be) designated an ETC. More specifically, AmTel will require all subscribers 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 47 C.F.R. § 54.409(a)(2) or 47 C.F.R. § 54.409(a)(3). AmTel also will confirm that the subscriber is not already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service.⁹

A. AmTel's Procedures to Determine Consumer Eligibility for the Lifeline Program

If AmTel cannot determine an applicant's eligibility for Lifeline by accessing income or program eligibility databases, AmTel personnel will review documents to establish eligibility in accordance with the criteria set forth in 47 C.F.R. §§ 54.409, 54.410.¹⁰ All AmTel personnel who interact with existing Lifeline customers or Lifeline applicants will be fully trained on the Commission's revised Lifeline eligibility rules and AmTel's practices and policies designed to implement these new rules. AmTel conducts monthly training sessions for its employees

⁸ 47 C.F.R. § 54.409.

⁹ 47 C.F.R. § 54.409(c).

¹⁰ Currently, AmTel utilizes only Company employees and does not use third party customer service representatives or agents to enroll subscribers in the Company's Lifeline service offerings. If, in the future, AmTel chooses to utilize such representatives, they will be trained in the Lifeline program and required to comply with the Company's practices and policies regarding the program. In addition, an AmTel employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement.

regarding the programs that qualify a customer for LifeLine service and any changes to the LifeLine program.

AmTel will follow the Commission's requirements pertaining to acceptable documentation to establish eligibility based either on income level or participation in a qualified government assistance program, unless otherwise established by a state Lifeline administrator or other state agency.¹¹ Specifically, 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 or 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.¹²

Acceptable documentation of income eligibility includes: (1) the prior year's state, federal, or Tribal tax return; (2) current income statement from an employer or paycheck stub; (3) a Social Security statement of benefits; (4) a Veterans Administration statement of benefits; (5) a retirement/pension statement of benefits; (6) an Unemployment/Workers' Compensation statement of benefit; (7) federal or Tribal notice letter of participation in General Assistance; (8) or a divorce decree, child support award, or other official document containing income information.¹³

¹¹ See USAC Guidance available at <http://www.usac.org/li/telecom-carriers/step06/default.aspx>.

¹² 47 C.F.R. § 54.410(c)(1)(i)(B).

¹³ 47 C.F.R. § 54.410(b)(1)(i)(B).

If the prospective subscriber presents AmTel with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.¹⁴

AmTel personnel will examine and record the type of documentation presented by each prospective Lifeline subscriber, but will not retain copies of these documents.¹⁵ If an applicant is unable to provide documentary proof of eligibility based on either household income level or current participation in a qualified program, AmTel will deny that application. 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.

If, in the future, AmTel utilizes agents it will not enroll customers at retail locations where the Company does not have an agency agreement with the retailer. Further, AmTel will require an agent retailer to have any employees involved in the enrollment process go through the standard AmTel field representative training, same as it would for any other agent. By establishing agency relationships with all of its field representatives, including future retail outlets, AmTel will meet the "deal directly" requirement adopted in the *TracFone Forbearance Order*.¹⁶

The Commission determined in the *Lifeline Reform Order* that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because

¹⁴ *Id.*

¹⁵ 47 C.F.R. § 54.410(b)(1)(ii) - (iii); 47 C.F.R. § 54.410(c)(1)(ii)-(iii).

¹⁶ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), 20 FCC Rcd 15095, ¶19 (2005).

“the Commission has consistently found that ‘[l]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.’”¹⁷ Because AmTel will be responsible for the actions of all of its employees and agents, including those enrolling customers in any AmTel owned or affiliated retail locations, and an AmTel employee will be responsible for overseeing and finalizing every Lifeline enrollment prior to including that customer on an FCC Form 497 for reimbursement, the Company will always “deal[] directly” with its customers to certify and verify the customer’s Lifeline eligibility.

B. AmTel’s Procedures for Subscriber Certifications

In the *Lifeline Reform Order*, the Commission established a path for a transition to a national database that will be used to confirm the initial and continued eligibility of a Lifeline customer.¹⁸ AmTel will utilize that database when it becomes operational. Until that time, however, AmTel will continue to use any relevant state databases where available, and will otherwise adhere to the following procedures for enrolling prospective customers into the Lifeline program.

AmTel has implemented certification procedures that enable prospective customers to demonstrate their eligibility by contacting AmTel in person. Except in states in which applicants are enrolled through a designated state agency, AmTel will have direct contact with all prospective customers applying for Lifeline service, through its employees. AmTel’s employees will check each applicant’s government-issued photo identification for identity verification and address normalization, which is entered into the enrollment application. If a prospective customer does not complete AmTel’s Lifeline Application in person, the applicant would be

¹⁷ *Lifeline Reform Order*, ¶ 110.

¹⁸ *See Lifeline Reform Order*, ¶ 403.

required to return the signed document, a copy of the applicant's government-issued photo identification and eligibility documentation to AmTel by mail, facsimile, electronic mail or other electronic transmission. AmTel 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.¹⁹ Currently, the majority of AmTel's Lifeline subscribers are enrolled in-person and the remainder are enrolled by telephone.

AmTel identifies and contacts prospective customers by distributing its marketing materials in areas where eligible Lifeline customers are likely to be found. In particular, AmTel distributes its fliers in areas where low-income public housing is located. The Company also distributes marketing materials outside of public service agencies.

Every prospective subscriber is required to comply with certain Lifeline certification requirements. In states with a designated state Lifeline administrator, AmTel will rely on the state administrator to ensure applicants comply with the certification requirement. In states without a Lifeline administrator, AmTel requires applicants to complete AmTel's "Lifeline Application." AmTel's Lifeline Applications for the states in which it currently operates is attached hereto at Exhibit 2. This Lifeline Application conforms to the subscriber certification requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410. AmTel has also included in Exhibit 2 a copy of its income eligibility worksheet that will be used for applicants to demonstrate eligibility based on income.

AmTel collects the following information from prospective subscribers in its Lifeline Application forms: (1) the subscriber's full name; (2) the subscriber's full residential address (P.O. Boxes are not permitted); (3) whether the residential address is permanent or temporary;

¹⁹ 47 C.F.R. § 54.419.

(4) the subscriber's billing address, if different; (5) the subscriber's date of birth; (6) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (8) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁰

The applicant also must 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.²¹ In accordance with 47 C.F.R. § 54.410(d), in its Lifeline Application, AmTel requires all Lifeline applicants to certify, under penalty of perjury, that: (1) the subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the subscriber will notify AmTel 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-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit; (3) if the subscriber is seeking to qualify for Lifeline as an eligible resident of Tribal lands, that he or she lives on Tribal lands; (4) if the subscriber moves to a new address, that he or she will provide that new address to AmTel within 30 days; (5) if the subscriber provided a temporary residential address to AmTel, the subscriber will verify his or

²⁰ 47 C.F.R. § 54.410(d)(2).

²¹ 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.*

her temporary residential address every 90 days; (6) the subscriber's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the subscriber's household is not already receiving a Lifeline service; (7) the information contained in the subscriber's application/certification form is true and correct to the best of the subscriber's knowledge; (8) the subscriber acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the subscriber acknowledges that he or she may be required to re-certify his or her continued eligibility for Lifeline at any time, and that his or her failure to re-certify as to continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits.²²

In accordance with 47 C.F.R. § 54.410(d)(1), AmTel's Lifeline Application discloses the following information: (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 subscriber's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.²³

Finally, in accordance with 47 C.F.R. § 54.405(c), AmTel's Lifeline Application indicates, using easily understood language, (1) that AmTel's low income targeted service is a

²² 47 C.F.R. § 54.410; *also see* Exhibit 2.

²³ *Id.*

Lifeline service; (2) that Lifeline is a government assistance program; (3) that the service is non-transferable; (4) that only eligible consumers may enroll in the program; and (5) that the program is limited to one discount per household.²⁴

C. AmTel's Procedures for Annual Verification of Lifeline Customers

In accordance with the requirements of the *Lifeline Reform Order* and 47 C.F.R. § 54.410(f), AmTel will annually re-certify all of its Lifeline subscribers by either (1) querying the appropriate eligibility or income databases, confirming that the subscriber continues to meet the program- or income-based eligibility requirements for Lifeline and documenting the results of that review, or (2) obtaining a signed certification from the subscriber that meets the certification requirements set forth in 47 C.F.R. § 54.410(d). 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.²⁵

For 2012, AmTel will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 on a rolling basis, to be completed by the end of 2012, and report the results to USAC by January 31, 2013.²⁶ AmTel will notify its subscribers in writing that a failure to respond to the recertification request will result in de-enrollment in the Lifeline program.²⁷ The Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must

²⁴ See *Lifeline Reform Order*, ¶ 275; 47 C.F.R. § 54.405(c).

²⁵ See *Lifeline Reform Order*, ¶ 145.

²⁶ See *Lifeline Reform Order*, ¶ 130.

²⁷ 47 C.F.R. § 54.405.

take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

AmTel will de-enroll subscribers who do not respond to the annual verification or fail to provide the required certification.²⁸ The Company will send a single written notice explaining that failure to respond to the re-certification request 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.

III. AMTEL'S PLANS FOR COMPLIANCE WITH THE FORBEARANCE CONDITIONS RELATING TO PUBLIC SAFETY AND 911/E911 ACCESS

AmTel's existing practices comply with the 911/E911 access conditions set forth in paragraph 373 of the *Lifeline Reform Order*. Specifically, AmTel currently: (1) provides its Lifeline subscribers with 911/E911 access at the time Lifeline service is initiated and, in the case of its wireless services, regardless of activation status and availability of minutes, and (2) provides its Lifeline subscribers with E911-compliant handsets and replaces, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services. AmTel's existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying carriers. AmTel commits to continue these practices going forward.

AmTel provides its wireline and wireless Lifeline customers with access to 911 and E911 services immediately upon initiation 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.

²⁸ See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3).

AmTel provides access to 911 and E911 services for all customers. The Company uses Sprint as its underlying network provider/carrier for its wireless service and AT&T for AmTel's wireline service offerings.²⁹ Sprint and AT&T route 911 calls from the Company's customers in the same manner as 911 calls from those carriers' own retail customers. To the extent that Sprint and AT&T are certified in a given PSAP territory, this 911 capability will function the same for the Company. AmTel also enables 911 emergency calling services for all properly activated wireless handsets regardless of whether the account associated with the handset is active or suspended. Finally, the Company transmits all 911 calls initiated from any of its wireless handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. AmTel ensures that all handsets used in connection with its wireless Lifeline service offering are E911-compliant. The Company uses phones from a variety of handset providers that have been through a stringent certification process, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any customer that qualifies for and elects wireless Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. 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. The Commission's handset requirements do not apply to AmTel's wireline Lifeline service offerings.

²⁹ AmTel Telco purchases wireless services from Liberty Wireless ("Liberty") and Reunion Communications, Inc. ("Reunion"), both of which in turn purchase services from Sprint. AmTel Now Telco has no relationship with Liberty, Reunion or Sprint other than for the purchase of access to Sprint's network.

IV. AMTEL'S PLANS FOR COMPLIANCE WITH THE COMMISSION'S MARKETING AND DISCLOSURE REQUIREMENTS FOR PARTICIPATION IN THE LIFELINE PROGRAM

AmTel's marketing materials³⁰ for its Lifeline services, state, in clear, easily understood language: (1) that the service is supported by Lifeline; (2) that Lifeline is a government assistance program; (3) that the service is non-transferable; (4) that that only eligible consumers may enroll in the program; (5) that documentation is necessary for enrollment; (6) that the program is limited to one discount; and (7) the Company's Lifeline Application 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.³¹ AmTel also discloses its name on all marketing materials.³² *See* Exhibit 3.

V. AMTEL'S PROCEDURES AND EFFORTS TO PREVENT WASTE, FRAUD AND ABUSE IN CONNECTION WITH LIFELINE FUNDS

AmTel shares the Commission's commitment to minimize waste, fraud and abuse of Lifeline benefits. Accordingly, AmTel commits to implementing a variety of measures and procedures intended to prevent duplicate Lifeline benefits from being awarded to the same household or individual.

Prevention of Duplicates within AmTel's Subscriber Base. At the time of initial sign up of a new subscriber, the subscriber's service address is validated for accuracy against the USPS ("United States Postal Service") database and saved in the USPS-approved format, which permits AmTel's subscriber database to more accurately prevent duplicates by preventing

³⁰ "Marketing materials" includes, but is not limited to print, audio, video, Internet (including email, web, and social networking media), and outdoor signage, that describe the Lifeline-supported service offering, including application and certification forms. *See Lifeline Reform Order*, ¶ 276; 47 C.F.R. § 54.405(c).

³¹ *Lifeline Reform Order*, ¶ 275; 47 C.F.R. § 54.405(c).

³² 47 C.F.R. § 54.405(d).

variations of the same address from appearing multiple times in the database. Once the address is validated for accuracy and format, it is checked against addresses for all AmTel Lifeline customers. If an existing AmTel subscriber is receiving service at the same address, AmTel's system will not permit any order for Lifeline service to proceed unless the customer completes the process described below regarding multiple households at an address.

If the applicant lives at an address with multiple households, the Company requires the applicant to complete and submit the written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, 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).³³ If an applicant completes this worksheet, the applicant's application and the worksheet undergo further review before the order is completed and the customer receives a phone. This is done to check to make sure that there is not a pattern of the same address being used for a large number of enrollments.

AmTel also conducts additional checks to ensure that the same household is not receiving more than one Lifeline service by checking its database for the same subscriber name, date of birth and the last four digits of the person's social security number. Moreover, all orders for Lifeline service are subjected to a secondary USPS accuracy and format check the following day. Any corrections needed as a result of the secondary check, such as correcting address format, are

³³ See *Lifeline Reform Order*, ¶ 78. The USAC worksheet is available at <http://www.usac.org/li/tools/news/default.aspx#582>.

promptly entered into AmTel's system. AmTel also conducts real-time scans of its database to flag any duplicate addresses, dates of birth, etc. in addition to conducting manual reviews of its subscriber lists prior to filing its FCC Form 497s to ensure that it does not claim subsidies for any duplicate addresses without having the accompanying USAC worksheet.

Service Activation. AmTel will not seek reimbursement for Lifeline service for any subscriber until the subscriber activates the service by completing an outbound call from the wireless handset.³⁴ After being enrolled in AmTel's Lifeline service program, subscribers are provided with a partially-activated handset. For in-person enrollment, the subscriber is directed to activate the phone by making a telephone call to someone other than AmTel. For subscribers that enroll by telephone, AmTel mails a partially-activated handset to the subscriber and the subscriber is directed to activate the telephone. AmTel will ensure the handset has been delivered to the correct subscriber by requiring the subscriber to call AmTel's customer service and provide the last four digits of the subscriber's social security number or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number. After providing the required information, AmTel customer service personnel activate the subscriber's handset.

Non-Usage Policy. AmTel's non-usage policy ensures that only subscribers who actually utilize their wireless service continue to receive Lifeline-subsidized service, and that AmTel only receives Lifeline support for those subscribers who remain enrolled in the program. AmTel commits to continuing this practice in strict conformance with the requirements of 47 C.F.R. §§ 54.407(c)(2), 54.405(e)(3).

³⁴ 47 C.F.R. § 54.407(c). This applies to subscribers as defined in section 54.407(c).

Specifically, after 60 days of non-use,³⁵ AmTel will provide notice to the wireless Lifeline subscriber that failure to use the Lifeline service or provide other confirmation to AmTel that the subscriber wishes to retain their Lifeline service within 30 days from the date of the de-enrollment notice will result in de-enrollment from the Lifeline program.³⁶ AmTel will not request further Lifeline reimbursement for any de-enrolled customer and AmTel will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.³⁷

AmTel's wireline services require subscribers to pay a monthly bill for the Company's services. Lifeline subscribers have the option of paying their monthly invoices by mail, telephone, Moneygram, or ACE check cashing locations. AmTel's subscribers have a regular billing relationship with the Company and, as a result, the activation and non-usage requirements do not apply.³⁸

One Per Household Rule. AmTel has implemented policies and practices in accordance with the Commission's rules and the *Lifeline Reform Order* to ensure that it provides only one Lifeline service per household. As described above, AmTel has already implemented procedures to ensure that AmTel itself only provides one Lifeline service per household. Specifically, upon receiving an application for the Company's Lifeline service, the Company searches its internal records to ensure that it does not already provide Lifeline-supported service to someone at the

³⁵ Subscribers can "use" the service by: (1) completing an outbound call; (2) purchasing minutes from AmTel to add to the subscriber's plan; (3) answering an incoming call from a party other than AmTel; or (4) responding to a direct contact from AmTel confirming that the subscriber wants to continue receiving the service. 47 C.F.R. § 54.407(c)(2).

³⁶ 47 C.F.R. § 54.405(e)(3).

³⁷ *Id.*

³⁸ See *Lifeline Reform Order*, ¶¶ 257, 263. See also 47 C.F.R. § 54.407(c).

same residential address.³⁹ When the National Lifeline Accountability Database becomes available, AmTel will fully comply with the requirements of 47 C.F.R. § 54.404 and will utilize the database to determine if an applicant is currently receiving Lifeline service from another carrier or if another person residing at the applicant’s residential address is receiving Lifeline service. AmTel’s employees will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name and ask applicants if they are receiving Lifeline services from another major Lifeline provider (e.g., SafeLink, Assurance, Reachout, etc.). Employees will emphasize that 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.

AmTel will make sure its subscribers accurately identify if they reside at an address with multiple households. If a customer checks the “multiple household” section on the application form, the Company will require the customer to complete the accompanying Multiple Household Worksheet to confirm the customer’s eligibility for service.

Finally, if AmTel has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, for example, due to a violation of the one-per-household rule, AmTel will initiate its termination process in accordance with the procedures set forth in 47 C.F.R. § 54.405(e)(1).

Company Reimbursements from the Fund. To ensure that the Company does not seek reimbursement from the Fund without a subscriber’s consent, AmTel 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

³⁹ See *Lifeline Reform Order*, ¶ 78.

subscribers for whom it is seeking reimbursement.⁴⁰ Further, the Company will submit its FCC Forms 497 by the eighth day of each month in order to be reimbursed the same month.⁴¹ In addition, the Company will keep accurate records as directed by USAC⁴² and as required by new section 54.417 of the Commission's rules.

Annual Company Certifications. AmTel 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;⁴³ (2) is in compliance with all federal Lifeline certification procedures;⁴⁴ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁴⁵

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).⁴⁶ Further, the Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴⁷

⁴⁰ See *Lifeline Reform Order*, ¶ 128; 47 C.F.R. § 54.407(d).

⁴¹ See *Lifeline Reform Order*, ¶¶ 302-306.

⁴² See 47 C.F.R. § 54.407(e).

⁴³ See *Lifeline Reform Order*, ¶ 126; 47 C.F.R. §54.416(a)(1).

⁴⁴ See *Lifeline Reform Order*, ¶ 127; 47 C.F.R. §54.416(a)(2).

⁴⁵ See 47 C.F.R. §54.416(a)(3).

⁴⁶ See *Lifeline Reform Order*, ¶¶ 132,148; 47 C.F.R. §54.416(b).

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

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,⁴⁸ 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.⁴⁹ 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.⁵⁰ 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 protection rules, as well as a certification that the Company is able to function in emergency situations.⁵¹

Cooperation with State and Federal Regulators. AmTel 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 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;⁵²

⁴⁸ See 47 C.F.R. §54.422(c).

⁴⁹ See *Lifeline Reform Order*, ¶¶ 296, 390; 47 C.F.R. §54.422(a).

⁵⁰ See *Lifeline Reform Order*, ¶ 390; 47 C.F.R. §54.422(b)(5).

⁵¹ See *Lifeline Reform Order*, ¶ 389; 47 C.F.R. §54.422(b)(1)-(4).

⁵² The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

- 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 believe⁵³ 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.

⁵³ See 47 C.F.R. § 54.405(e)(1).

VI. CONCLUSION

AmTel submits that the foregoing Compliance Plan fully satisfies the conditions set forth in the *Lifeline Reform Order*, the *Public Notice* and the Commission's rules pertaining to Lifeline. Accordingly, AmTel respectfully requests expeditious approval of this Compliance Plan so that AmTel may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC and may provide service to additional eligible low-income consumers in the various states for which it has pending ETC petitions.

Respectfully submitted,



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*Counsel to TelOps International, Inc. d/b/a
AmTel*

March 7, 2013

Exhibit 1
Lifeline Offerings

Plan Description (Arkansas) (Wireless) **Retail Price**

Lifeline Free Plan 250 **Free**

250 free voice minutes per month. Text messaging is assessed at a rate of 1 minute per text message for sending and 1 minute per text message for receiving text messages.

Plan Additions (AR) **Retail Price***

Additional Minutes Offering Plans come in increments of \$10, \$20, \$30

100 Minutes/Texts \$10

300 Minutes/Texts \$20

500 Minutes/Texts \$30

*Applicable taxes and government fees are assessed to the above Plan Additions.

Arkansas Wireline

Basic Local

Retail Price

\$14.95 plus tax**

** \$24.20 without Lifeline discount

Oklahoma Wireline

Basic Non- Tribal

Retail Price

\$26.00 plus tax***

*** \$36.42 before discounts. The Lifeline discount of \$9.25 and the Oklahoma USF discount of \$1.17 is applied.

Basic Tribal

Retail Price

\$1.00 plus tax****

****\$36.42 before discounts. The Lifeline discounts of \$9.25 and \$25.00 and the Oklahoma USF discount of \$1.17 are applied.

Exhibit 2

Lifeline Application Form



[State] Wireless Lifeline Service Application and Certification
 Mail or fax form completed and signed form to:
 P.O. Box 561628 Dallas, Texas 75356
 Fax 940-293-1803/Customer Service: 866-293-9607

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in TelOps International, Inc. dba AmTel'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**):

- Supplemental Nutrition Assistance Program (SNAP)
- Section 8 Federal Public Housing Assistance (FPHA)
- Medicaid (not Medicare)
- 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
- Income at or below 135% of Federal Poverty Guidelines
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards (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): Permanent 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 (name, telephone number, address, date of birth, last 4 digits of SSN, amount of support being sought, means of qualification for support, and dates of service initiation and termination), 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

Last 4 digits of Document from List B _____

Date of Proof Document: _____

Expiration Date of Proof Document: ____/____/____

***If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering three (3) consecutive months within the previous twelve (12) months.**

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)

Applicant Account Number	Rep/Agent Signature



[State] Wireline Lifeline Service Application and Certification

Mail or fax form completed and signed form to:

P.O. Box 561628 Dallas, Texas 75356

Fax 940-293-1803/Customer Service: 866-293-9607

A complete and signed Lifeline Service Application and Certification ("Certification") is required to enroll you in TelOps International, Inc. dba AmTel'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**):

- Supplemental Nutrition Assistance Program (SNAP)
- Section 8 Federal Public Housing Assistance (FPHA)
- Medicaid (not Medicare)
- 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
- Income at or below 135% of Federal Poverty Guidelines
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance (BIA)
- Tribally Administered TANF (TATNF)
- Head Start (meeting income qualifying standards) (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): Permanent 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.

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 (name, telephone number, address, date of birth, last 4 digits of SSN, amount of support being sought, means of qualification for support, and dates of service initiation and termination), 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 _____

***If the documentation of income does not cover a full year, the applicant must present the same type of documentation covering three (3) consecutive months within the previous twelve (12) months.**

Last 4 digits of Document from List B _____

Date of Proof Document: _____

Expiration Date of Proof Document: ____ / ____ / ____

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)

Applicant Account Number	Rep/Agent Signature

AmTel 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 TelOps International, Inc. dba AmTel. 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 3

Sample Marketing Materials

HOME PHONE SERVICE

Pay Nothing to Start Service

AFFORDABLE MONTHLY RATES AS LOW AS

Basic Phone Line - \$1.00*

Basic Phone Line + Caller ID - \$1.45*

Basic Phone Line + Caller ID and Call Waiting - \$1.95*

Basic Phone Line + 11 Calling Features - \$6.00*

*Plus Fees and Taxes, Lifeline Plans Require Lifeline Certification



If you or any other member of your household receives:

**Medicaid/Sooner Care - Food Stamps - TANF - SSI -
Housing Assistance - Low Income Energy - Head Start -
School Lunch Program - Indian Affairs Assistance**

YOU QUALIFY FOR THIS SPECIAL PHONE BENEFIT

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.

866-293-9607

TelOps International, Inc. d/b/a AmTel

HOME PHONE SERVICE

Pay Nothing to Start Service

AFFORDABLE MONTHLY RATES AS LOW AS

\$14.95*/month

*Plus Fees and Taxes,
Lifeline Plans Require Lifeline Certification



If you or any other member of your household receives:

Medicaid - Food Stamps - TANF - SSI - Housing Assistance - Low Income Energy - Head Start - School Lunch Program - Indian Affairs Assistance

YOU QUALIFY FOR THIS SPECIAL PHONE BENEFIT

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.

866-293-9607

TelOps International, Inc. d/b/a AmTel

Wireless Phone Service

Pay Nothing to Start Service

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



If you or any other member of your household receives:

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

YOU QUALIFY FOR THIS SPECIAL PHONE BENEFIT

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.

866-293-9607

TelOps International, Inc. d/b/a AmTel