

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

July 3, 2013

VIA ECFS

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

Re: Talkfly, LLC
Compliance Plan
WC Docket No. 09-197

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission Order *In the Matter of Lifeline and Link Up Reform and Modernization* released February 6, 2012, attached please find Talkfly, LLC's Compliance Plan (WC Docket No. 09-197).

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
Attorneys for Talkfly, LLC

Enclosure
cc: Troy Guillett

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

In the Matter of the)	
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	WC Docket No. 11-42
Lifeline and Link Up Reform and Modernization)	
)	
Talkfly, LLC)	
Compliance Plan)	

TALKFLY, LLC'S COMPLIANCE PLAN

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

Attorneys for Talkfly, LLC

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**Before the
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In the Matter of the)	
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Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
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Talkfly, LLC)	
Compliance Plan)	

TALKFLY, LLC’S COMPLIANCE PLAN

I. INTRODUCTION

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

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Order*”).

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

severe economic environment that is forcing many low-income customers to forego wireless service, Talkfly respectfully requests expeditious approval of this plan so that the Company, upon designation as an ETC, may quickly deploy much-needed Lifeline services to qualified low-income customers.

II. BACKGROUND

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

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

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

III. TALKFLY WILL COMPLY WITH THE REQUIREMENTS SET FORTH IN THE ORDER

Talkfly will comply with all conditions set forth in the *Order*, the provision of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States.⁴

³ See *Order* at ¶¶ 368, 373 and 379.

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

A. Access to 911 and E911 Services

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

B. E911-Compliant Handsets

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

C. Consumer Eligibility and Enrollment

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

⁵ See *Order* at ¶ 373.

⁶ See *id.*

⁷ See *Order* at ¶ 98.

procedures set forth below.

1. One-Per-Household

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

⁸ See *Order* at ¶ 74.

⁹ See *Order* at ¶ 78.

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

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

2. Initial and Annual Certification

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

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

¹¹ See Order at ¶ 85.

¹² See Order at ¶ 89.

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

¹⁴ See Order at ¶ 85.

¹⁵ See *id.*

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

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

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

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

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

Talkfly will require all consumers, at sign up and annually thereafter, to certify under penalty of

perjury that:

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

Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements. Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures, including Interactive Voice Response (IVR) recordings, that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006.¹⁶

Enrollment in person. The Company will primarily enroll Lifeline applicants in person at Company events. When a prospective customer applies at an event, Company employees, agents or

¹⁶ See Order at ¶ 168.

representatives (“personnel”) will ask to see a government issued ID and will validate the address via a USPS/Melissa Database. The Company will check the National Lifeline Accountability Database, once it is available; until that time, the Company will input the name/address combination into the Company’s internal database to confirm that the applicant is not already receiving a Lifeline subsidy from Talkfly. If the customer indicates on the application form that their address is a multi-household residence, personnel will require the applicant to complete USAC’s one-per-household template as well. In cases where an eligibility database exists, personnel will query the database to determine eligibility. In states where eligibility databases are not available, the applicant is required to provide proof of participation in one of the Lifeline eligible programs or proof that their annual household income is at or below 135% of the federal poverty guidelines. Talkfly’s Lifeline application contains an “Office Use Only” section, which must be completely filled out and signed by Company personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). Eligibility documents are returned to the customer after review. Finally, Talkfly personnel will verbally review all certifications and disclosures with the applicant before they sign the application form, making sure the applicant verbally acknowledges each required certification before moving on to the next. Upon successful completion of the certification process, the customer is allowed to receive their phone in person. In instances where eligibility databases cannot be accessed in real-time, Talkfly will mail the phone to eligible customers once verification of eligibility is complete. Customers will be instructed to call the Company when they receive the phone in order to activate their account; this activation call will capture the customer’s name and unique identifier (i.e. last four digits of SSN) in order to verify that the person activating the phone is the intended recipient.

Talkfly may also enroll customers at retail stores, in which case the protocol for signing up

customers closely resembles the process at an event. Company employees, agents or representatives are able to access necessary databases (USPS/Melissa, duplicates database, eligibility databases) to verify eligibility, and, when required, can personally review eligibility based on proof of income or program participation. Company personnel are able to verbally review the required disclosures with applicants and obtain the completed application form in person. Phones are delivered upon successful completion of the certification process, as detailed above, and customers will be instructed to call the Company when they receive the phone in order to activate their account; this activation call will capture the customer's name and unique identifier (i.e. last four digits of SSN) in order to verify that the person activating the phone is the intended recipient.

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

application form, which must be completely filled out and signed by personnel in order to record a description about the specific documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). Talkfly will destroy copies of proof documentation and deliver phones to eligible customers by mail. Customers will be instructed to call the Company when they receive the phone in order to activate their account; this activation call will capture the customer's name and unique identifier (i.e. last four digits of SSN) in order to verify that the person activating the phone is the intended recipient.

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

¹⁷ See Order at ¶ 123.

documentation reviewed as part of the eligibility verification process, including type of documentation (i.e. Food Stamps) and a unique identifier (last 3 digits of document ID). Talkfly will destroy copies of proof documentation and deliver phones to eligible customers by mail. Customers will be instructed to call the Company when they receive the phone in order to activate their account; this activation call will capture the customer's name and unique identifier (i.e. last four digits of SSN) in order to verify that the person activating the phone is the intended recipient.

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

¹⁸ See Order at ¶ 97.

¹⁹ See Order at ¶ 98.

²⁰ See Order at ¶ 99.

her eligibility.²¹ Talkfly understands that it may permit agents or representatives to review documentation of consumer program eligibility for Lifeline, and in such cases Talkfly remains liable for ensuring the agent or representative's compliance with the Lifeline program rules.²²

Talkfly will provide Lifeline-specific training to all personnel – employees, agents, and representatives – designed to give them an understanding of Lifeline program requirements and permit them to review customer documentation and determine whether it is sufficient to establish a customer's eligibility to participate in the Lifeline program under the Commission's rules. No Company employee, agent, or representative may accept a Lifeline application unless he or she has first completed this training program and demonstrated an understanding of the underlying material. Among other things, the Lifeline program training discusses the Company's Lifeline application form (see Exhibit A) on a section-by-section basis. The training explains what sections of the form must be completed by the customer and reviews the form disclosures in detail, to facilitate the ability of employees, agents, or representatives to explain each item contained therein and answer any customer questions. Because the Company is responsible for the actions of all its personnel, including those enrolling customers in any Company-owned or agent retail locations, and a Company 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 always “deals directly” with its customers to certify and verify customers' Lifeline eligibility.

3. Annual Re-Certification

Talkfly understands that it must annually re-certify the eligibility of its entire Lifeline subscriber base and report the results to USAC, and the Company may elect to perform this re-

²¹ See Order at ¶ 101.

²² See Order at ¶ 110.

certification on a rolling basis throughout the year.²³ Each year, Talkfly will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.²⁴ The re-certification notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company. Talkfly will obtain a signed certification from the subscriber that meets the certification requirements of 47 C.F.R. § 54.410(d), as amended, as detailed in section C.2 above. The Company will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days.

Talkfly understands that such certifications may be obtained through a written format, an IVR system, or a text message, and will use one or more of such options for its certifications.²⁵

Alternatively, where a database containing consumer eligibility data is available, Talkfly (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification. If a subscriber's address cannot be verified through the state data, Talkfly will contact the subscriber every year during the annual certification process to obtain a valid address.²⁶ Talkfly understands that it may elect to have USAC administer the self-certification process on the Company's behalf.²⁷

Talkfly will certify its compliance with Commission rules on an annual Lifeline eligible telecommunications carrier certification form and when submitting FCC Forms 497 to USAC for

²³ See Order at ¶ 130.

²⁴ See *id.*

²⁵ See Order at ¶ 132.

²⁶ See Order at ¶ 131.

²⁷ See Order at ¶ 133.

reimbursement. As part of Talkfly's submission of re-certification data pursuant to 47 C.F.R. § 54.416, an officer of the Company will certify annually to USAC:

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

(2) that the Company is in compliance with all federal Lifeline certification procedures.²⁸

D. Other Reforms to Eliminate Waste, Fraud and Abuse

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

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

²⁸ See Order at ¶ 126-27.

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

Talkfly validates the applicant's address via a USPS/Melissa Database to ensure the address is correct. The Company will check the NLAD, once it is available; until that time, the Company will input the name/address combination into the Company's internal database \ to confirm that the applicant is not already receiving a Lifeline subsidy from Talkfly. This prompts the representative to detail the one-per-household rule with the applicant.

1. National Lifeline Accountability Database

Talkfly will participate in the National Lifeline Accountability Database, once it is established. As required by the *Order*, Talkfly will provide to the NLAD subscriber name, address, phone number, the last four digits of Social Security number, date of birth, Lifeline service initiation and de-enrollment date (when applicable), and amount of federal Lifeline support being sought for that subscriber.²⁹ Talkfly will provide the information listed above for existing subscribers within 60 days of Commission notice that the NLAD is capable of accepting subscriber information.³⁰

Furthermore, on its certification form, Talkfly will obtain acknowledgement and consent from each of its subscribers that is written in clear, easily understandable language that the subscriber's name, telephone number, and address will be divulged to USAC (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit.³¹

Within 30 days following Commission notice that the NLAD is capable of accepting queries, Talkfly will query the NLAD to check to see if a prospective subscriber is already receiving service from another ETC at a residential address prior to seeking reimbursement from

²⁹ See *Order* at ¶ 189.

³⁰ See *Order* at ¶ 190.

³¹ See *Order*, Appendix C.

the Fund.³²

2. Subscriber Usage

Talkfly will not seek reimbursement from the USF for new subscribers until they have personally activated the service, either by initiation and/or actual use of the service by the subscriber. Furthermore, Talkfly will not seek reimbursement from the USF for inactive subscribers who have not used the service for a consecutive 60-day period.³³ Talkfly will notify its subscribers at service initiation, via the certification form and via script that is reviewed with every customer, about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.³⁴ An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.³⁵ Talkfly will notify the customer if the customer has not used their service for more than 30 or 60 consecutive days. Furthermore, the Company has a Compliance Manager who ensures that the Company does not request a subsidy for customers that are inactive under the Company's non-usage policy. After notification, if the customer fails to use the phone, it is automatically de-enrolled pursuant to the procedures outlined in section E below. Talkfly will continue to comply with applicable public safety, including transmitting 911 calls to the

³² See Order at ¶ 203.

³³ See Order at ¶ 257.

³⁴ See *id.*

³⁵ See Order at ¶ 261.

appropriate PSAP even if the Company is no longer providing Lifeline service to a consumer.³⁶

3. Marketing & Outreach

Talkfly will implement the measures outlined herein to help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse. Talkfly will explain in clear, easily understood language the following disclosures in all marketing materials related to the supported service:³⁷ (1) the offering is a Lifeline-supported service; (2) only eligible consumers may enroll in the program; (3) the program is limited to one benefit per household, consisting of either wireline or wireless service; and (4) Lifeline is a government benefit program. Talkfly's website and printed collateral will explain the documentation necessary for enrollment, and the details of Talkfly's plans. Such collateral and website information, as well as its application, will make clear that consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.³⁸ For broadcast advertisements and outdoor signs, and any other situation in which inclusion of documentation information and warnings against willful false statements are not practicable, Talkfly will include the URL link for its website where disclosures will be listed. Additionally, Talkfly will disclose the company name under which it does business.³⁹

4. Audits

³⁶ See *Order* at ¶ 262. 911 transmission will actually be performed by the Company's underlying facilities-based CMRS provider.

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

³⁸ See *Order* at ¶ 275.

³⁹ See *id.*

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

E. De-Enrollment

If at any time a Talkfly Lifeline customer wishes to de-enroll from the Company's Lifeline program, Company customer service representatives will handle such elective de-enrollment requests. Talkfly Lifeline customers simply call the Company, via 611 or the toll-free customer service number, and they can speak to a live operator to de-enroll from Talkfly's Lifeline program. Talkfly will de-enroll consumers from the Company's Lifeline program in the following instances, according to C.F.R. § 54.405(e):

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

If a customer does not respond to the Company's annual verification survey within 30 days, or if Talkfly has reasonable basis to believe that the subscriber no longer meets the

⁴⁰ See *Order* at ¶ 291.

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

⁴² See *Order* at ¶ 122.

Lifeline-qualifying criteria (including instances where a subscriber informs the Company or the state that he or she is ineligible for Lifeline), Talkfly will provide a written notice of impending service termination to the subscriber and then give the subscriber 30 days after the date of the letter to demonstrate that his or her Lifeline service should not be terminated.⁴³ Similarly, Talkfly will de-enroll a subscriber if they fail to respond to the Company's attempt to verify a temporary address within 30 days.⁴⁴

Duplicative Support. Subject to USAC's Duplicate Resolution Process and anticipated Duplicate Scrubbing Process,⁴⁵ Talkfly will de-enroll a subscriber within 5 business days if the Company is informed by USAC that the subscriber is receiving Lifeline service from another ETC or that more than one member of a subscriber's household is receiving Lifeline service.

Non-Usage. Talkfly will de-enroll any subscriber that has not used the Company's Lifeline service for 60 consecutive days, as discussed in section IV.B above. Talkfly will provide the subscriber 30 days' notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the 30-day notice period will result in service termination for non-usage; such notice may be initiated after 30-days of non-usage. Talkfly will update the national database, once in place, within one business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁶

F. Additional Rule Amendments

1. Terms and Conditions of Service

Talkfly has attached as Exhibit C its Lifeline terms and conditions of service. The Company's Lifeline offering is summarized in section IV.C below. These terms and conditions are

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

⁴⁴ *See Order* at ¶ 89.

⁴⁵ *See Order* at ¶ 214-16.

⁴⁶ *See Order* at ¶ 257.

subject to change as needed, and the most current version may be found at www.talkflywireless.com. The terms and conditions of the Company's retail plans, as generally available to the public and to which a Lifeline customer can apply their Lifeline discount, can be found at www.talkflywireless.com.

2. Reporting Requirements

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

3. Reimbursement from USAC

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

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

⁴⁸ See *Order* page 221.

⁴⁹ See *Order* at ¶ 128.

⁵⁰ See *Order* at ¶ 302.

4. Section 54.202 Certifications

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

IV. COMPANY INFORMATION

Talkfly is a Texas limited liability company. Talkfly will provide prepaid wireless telecommunications services to consumers by using the network of its underlying carrier(s), currently Sprint Spectrum L.P. (“Sprint”). Sprint is a nationwide carrier that provides wholesale capacity on its wireless network to resellers like Talkfly. Talkfly has a contract with Telecom Service Bureau, a Mobile Virtual Network Enabler (“MVNE”), to purchase the minutes of Sprint for re-sale. The Company will obtain from Sprint the network infrastructure and transmission facilities to allow Talkfly to operate as a Mobile Virtual Network Operator (“MVNO”).

A. Operations

Talkfly does not have any holding company, operating company or affiliates. Talkfly will utilize the services of Telecom Service Bureau for enrollment agents and Telepro for assistance providing customer service.

B. Financial and Technical Capability

Talkfly is financially and technically capable of providing Lifeline-supported services.⁵¹ Talkfly will provide service to both Lifeline and non-Lifeline customers. Talkfly will provide a prepaid program for non-Lifeline customers. In fact, whenever a Lifeline customer enrolls with Talkfly, the Company will seek to provide non-Lifeline service to other members of their household. Talkfly is financially able to provide Lifeline-supported services and will not rely

⁵¹ See Order at ¶ 387.

exclusively on USF disbursements to operate. In the event that USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. Furthermore, the senior management of Talkfly has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.⁵² Talkfly will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

C. Customer Service

Talkfly is dedicated to quality customer service and care. Lifeline customers can reach the Company's Customer Service department via phone, mail and e-mail. Talkfly's Customer Service department is available Monday through Friday 8am-5pm CST. The Company has a dedicated Customer Service staff that will handle all service requests, including elective de-enrollments as outlined in Section III.E above.

D. Lifeline Offering

Talkfly will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, currently Sprint. As summarized in Exhibit E attached hereto, the Company's Lifeline offering will provide customers with 250 minutes of talk and text per month at no charge.⁵⁴ Lifeline customers will have access to voicemail, caller I.D. and call waiting services at no charge, even after their initial allotment of included minutes has been consumed. Airtime minutes are not deducted for calls to customer service (via 611 or the toll free number) or calls to 911; customers may place calls to 911 for free, regardless of account balance or activation status. Customers are not bound by a local calling area requirement; Talkfly provides

⁵² See Exhibit D for key management resumes.

⁵⁴ The Company reserves the right to alter the proposed Lifeline rate plans on a state-by-state basis, particularly as required by state public utility commissions (PUC). The Company commits to pass through the entire Lifeline subsidy amount directly to the consumer.

domestic long distance at no extra charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Talkfly currently blocks roaming and international calling features, so Lifeline customers are not at risk for incurring unexpected charges for these features. Lifeline customers can also purchase additional airtime if needed. Airtime cards are currently sold in denominations of \$10 (100 minutes), \$20 (200 minutes), \$30 (300 minutes), and may be purchased over the phone. Talkfly does not impose burdensome credit checks or long-term service contracts. Talkfly's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

V. CONCLUSION

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

Respectfully submitted,

Talkfly, LLC

/s/ Lance J.M. Steinhart

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

Its Counsel

Dated July 3, 2013

Exhibit A

Sample Lifeline Certification Form



A PERSONAL INFORMATION

The person below MUST BE the same person applying for Lifeline service. Please do not forget to sign the application in Section E.

First Name: _____ Last Name: _____
(Please Print Full First Name Clearly) (Please Print Full Last Name Clearly)

Date of Birth: ____/____/____ Last 4 digits of SSN: [] [] [] [] Home Telephone Number: _____
mm/dd/yyyy (if applicable)

Email: _____

Home Address: Is this a temporary address?

Street Address: _____ Apt: _____
(PO Boxes Cannot Be Accepted)

City: _____ State: _____ Zip Code: _____

Mailing Address: (if different from above)

Street Address: _____ Apt: _____

City: _____ State: _____ Zip Code: _____

COMPLETE SECTION B OR C

B PROGRAM-BASED ELIGIBILITY

Fill in bubbles for all programs that you or a household member are currently enrolled in. **You must provide proof of program participation (DO NOT SEND ORIGINAL DOCUMENTS).** This could include a copy of your benefit ID card, a copy of an eligibility letter from an authorized agency or current or prior year's statement of benefits.

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Supplemental Security Income (SSI) (Not the same as Social Security Benefits) General Assistance
- Low Income Energy Assistance Program (LIEAP)
- Section 8 Public Housing Assistance
- Bureau of Indian Affairs General Assistance
- Temporary Assistance for Needy Families
- Tribally Administered Temporary Assistance for Needy Families
- Head Start (tribal programs for only those meeting its income qualifying standard)
- Free School Lunch Program
- Tribally Administered Free School Lunch Program
- Food Distribution Program

REMINDER: YOU MUST PROVIDE A COPY OF YOUR PROGRAM PARTICIPATION

-OR-

C INCOME-BASED ELIGIBILITY

Calculate **TOTAL** household income by reporting the income of all adult persons residing in your home in the appropriate category.

REMINDER: YOU MUST PROVIDE PROOF OF INCOME (DO NOT SEND ORIGINAL DOCUMENTS).

Household Size	Maximum Yearly Income
<input type="radio"/> 1	\$ 16,755
<input type="radio"/> 2	\$ 22,695
<input type="radio"/> 3	\$ 28,635
<input type="radio"/> 4	\$ 34,575
<input type="radio"/> 5	\$ 40,515
<input type="radio"/> _____	\$ _____

If you have more than 5 people in your household, write the number and add \$5,940 for each additional person on top of the \$40,515.

Proof of income reported: Choose an item from the list below and include it with your application.

Three consecutive months of one of these statements (from the previous 12 months):

- Your pay stubs
- Social Security benefits statement
- Veterans Administration benefits statement
- Retirement/Pension benefits statement
- Unemployment/Workers' Compensation benefits statement

One of these documents:

-OR-

- Prior year's State or Federal income tax return
- Income statement from employer
- Federal letter of participation in General Assistance
- Divorce decree or child support document containing income

TURN OVER TO COMPLETE



Mail the Application to: Talkfly LLC, 21175 Tomball Pkwy Ste 413, Houston, TX 77070

-OR-

Fax materials to: 1-877-834-4040



D ACCOUNT PIN & SECRET ANSWER

If you qualify, you'll be asked to enter your Account PIN whenever you access your Talkfly account. If you ever forget your PIN, we'll ask you for your Secret Answer. To keep your service working, you will need to remember both of these answers. Please write them down for safekeeping.

CHOOSE YOUR ACCOUNT PIN:

Think of a secret 6-digit number that's easy to remember, keeping these rules in mind:

- No more than 3 consecutive numbers in a row (123456 won't work)
- No repeated numbers next to each other (445566 won't work)
- Numbers only (no symbols or letters)

Your Account PIN: _____

-AND-

CHOOSE YOUR SECRET ANSWER:

What is your favorite city?

Your Secret Answer: _____

E SIGNATURE

By signing below, I certify under penalty of perjury that the information contained within this application is true and correct to the best of my knowledge.

I understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

- I understand that Lifeline is a federal government benefit program and that willfully making a false statement or providing fraudulent documentation in order to obtain this government benefit may result in fines, imprisonment, de-enrollment or permanent removal from the program.
- I understand that only one Lifeline discounted service (landline or wireless) is available 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 is not permitted to receive Lifeline benefits from multiple providers. I understand that violation of the one-per-household rule constitutes a violation of federal rules and will result in de-enrollment from the Lifeline program and potential prosecution by the United States government.
- I understand that Lifeline is a non-transferable benefit. I will not transfer to any third party, including another eligible individual, any of the rights or benefits received under the Talkfly service.
- I certify that I participate in a qualifying federal program or meet the income qualifications to establish eligibility for Lifeline. I have provided documentation as proof of eligibility for Section B or Section C.
- I certify that my household will receive only one Lifeline benefit. To the best of my knowledge, (i) my household is not already receiving a Lifeline Benefit.
- I certify that if I have provided a temporary address: Talkfly will attempt to verify every 90 days that I continue to reside at that address, and I must notify Talkfly within 30 days of any change of address. If I do not respond to Talkfly's address verification attempts within 30 days, I may be de-enrolled from Talkfly service.
- I certify that I will inform Talkfly within 30 days of any of the following, and may be subject to penalties if I fail to do so:
 - I move to a new address.
 - I no longer participate in a Lifeline qualifying program or my annual household income exceeds 150% of the Federal Poverty Guidelines.
 - I become aware that my household is receiving more than one Lifeline benefit.
 - For any other reason, I no longer meet the criteria for federal Lifeline support.
- I authorize Talkfly or its agent to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Talkfly service. I authorize state or federal agency representatives to discuss with, and/or provide information to, Talkfly verifying my participation in public assistance programs that qualify me for Talkfly service.
- I authorize Talkfly to provide access to or release any records required for the administration of Talkfly service.
- I understand that the completion of this application does not constitute immediate approval for Talkfly service.
- For unresolved questions or complaints you may contact the Kansas Corporation Commission, Office of Public Affairs and Consumer Protection, at KCC Consumer Protection, 1500 SW Arrowhead Road, Topeka, KS 66604 or toll-free 1-800-662-0027 or in Topeka 785-271-3140. Hearing or speech impaired TDD Kansas Relay Center 1-800-766-3777.

YOU MUST INITIAL THE FOLLOWING STATEMENTS BELOW:

_____ No one in my household is receiving Lifeline benefits from another provider to my knowledge.

_____ I understand that I may be required to re-certify continued eligibility for Lifeline at any time, and that failure to do so will result in the termination of my Lifeline benefits.

_____ I consent to have my personal identification information shared with the Universal Service Administrative Company (USAC) (the Lifeline Program administrator) and/or its agents for the purpose of confirming that neither I nor my household receives more than one Lifeline benefit.

X _____
SIGNATURE (Please use blue or black ink)

DATE: ____/____/____
mm/dd/yyyy

X _____
PRINTED NAME

- Have you remembered to initial and sign the Application?
- Have you remembered to attach copies of your documentation?

Exhibit B

Sample Advertisements



Call Now
1.877.246.9654
Nationwide Coverage



LifeLine
100 Minutes & 100 Texts
Upgrade Plans starting from \$14.95

You will be required to provide documentation verifying your participation in one of the eligible programs listed below or documentation verifying your household income. Medicaid, Food Stamps/SNAP, General Assistance, Head Start, Supplemental Security Income (SSI), Low Income Energy Assistance Program (LIHEAP), Temporary Assistance for Needy Families (TANF), United Tribes Food Distribution Program, Bureau of Indian Affairs General Assistance, Tribal TANF, National School Lunch's FREE Lunch Program (NSL), Federal Public Housing Assistance (Section 8)

Attention: Only eligible consumers may enroll in the program. The program is limited to one benefit per household, consisting of either wireline or wireless service.

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

Lifeline is a government benefit program. 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.

Exhibit C

Lifeline Terms and Conditions

Terms and Conditions for Lifeline

If you are a resident of Kansas, you may qualify for the TalkFly Lifeline Credit. If you or another person in your household is enrolled in at least one of the public assistance programs listed below, you may qualify.

- Medicaid
- Food Stamps/SNAP
- General Assistance
- Head Start
- Supplemental Security Income (SSI)
- Low Income Energy Assistance Program (LIHEAP)
- Temporary Assistance for Needy Families (TANF)
- United Tribes Food Distribution Program
- Bureau of Indian Affairs General Assistance
- Tribal TANF
- National School Lunch's FREE Lunch Program (NSL)
- Federal Public Housing Assistance (Section 8)

You may also qualify if your household's total annual gross income is at or below 135% of the Federal Poverty Guidelines.

One Person Household: \$15,080*

Two Person Household: \$20,426*

Three Person Household: \$25,772*

Four Person Household: \$31,118*

Five Person Household: \$36,464*

Six Person Household: \$41,810*

Seven Person Household: \$47,156*

More Than Seven Person Household: \$52,502* plus \$5,346* for each additional household member

*Income eligibility guidelines are subject to change

You will be required to provide documentation verifying your participation in one of the eligible programs or your household income.

If you qualify for Lifeline Assistance, you can receive a Free phone, 200 FREE minutes and 200 FREE text messages each month.

Restrictions

The Lifeline Assistance program is available for only one wireless or wireline account per household. Separate households that live at the same address are eligible, including residents of homeless shelters and nursing homes, for example. Residents with temporary addresses are also eligible

For unresolved questions or complaints you may contact the Kansas Corporation Commission, Office of Public Affairs and Consumer Protection, at KCC - Consumer Protection, 1500 SW Arrowhead Road, Topeka, KS 66604 or toll-free 1.800.662.0027 or in Topeka 785.271.3140. Hearing or speech impaired TDD Kansas Relay Center 1.800.766.3777.

Exhibit D

Key Management Resumes

Telecommunications Executive – Business Development & Project Management

No one is more focused than Troy Guillett on making a project come together – surpassing agent and customer expectations, and motivating teams to execute the vision and exceed goals. A master fixer, he tackles problems head-on, works smart and hard, to develop winning solutions, and maximizes economic performance.

Troy tells it straight. He is driven by a fundamental belief in honesty – offering his employees, partners, and associates direct viewpoints on where the business stands; providing accurate feedback and evaluation to his teams.

When he started Connect Insured Telephone in 2002, Troy started things with efficient, purposeful sessions focusing on assigned responsibility, meeting minutes, personally keyed agendas, and positive team reinforcement. Creating an immediate outcome of high morale and teams, that were energized with a spirited “can-do” attitude.

Over his 10 years with Connect IT, Troy helped land and lead multiple key projects, recently acquiring more than 700 new customers in Texas.

As a technician for Southwestern Bell, Troy acquired the necessary tools and understanding in the telecommunications industry to be successful with Connect IT. Armed with an intimate knowledge of the telecommunications industry combined with resourcefulness and creativity with data and ideas, Troy was a natural fit to start Connect IT.

He frequently draws from his base understanding of Telecommunications gained from his time with Southwestern Bell and his business college hours in business administration.

Troy Guillett can be reached at (936) 372 - 9114, or via email at connecttroy@yahoo.com

Telecommunications Executive - Operations Management

His management expertise spans the full range of operational functions – HR, IT, P&L, accounting, customer service and administration. Add to this his marketing expertise, creating value proposition to customers and penetrating new markets for services, combined with his many years of experience in the telecommunication service industry. Joseph is a well-rounded business leader equipped and driven to handle any situation impeding corporate initiatives.

Throughout his career, Joseph has brought the vision and surefire work tools, to exact needed change and engage everyone in the new mission. His innate talent to engage associates at every level has benefitted his companies immeasurably by instilling loyalty and excitement up, down, and across organizations.

Benchmarking process, system, and quality improvements across the board, the benefits Joseph has brought to Connect Insured Telephone have been substantial, despite facing a total revamp of operations one year ago. He established a knowledgeable, cohesive, and customer-focused workforce; grew transactions and accounts while reducing headcount 28%; reduced employee turnover 50%.

At Connect IT, Joseph shared lessons he learned at top corporate levels; developing training programs, employee tools, leadership programs, strategy and vision, customer service programs, and cost efficiency programs.

Joseph Tilghman can be reached via email at jody1@yahoo.com or telephone at (832) 731- 4974.

Exhibit E

Proposed Lifeline Rate Plans

Lifeline 250 Minutes - Free Monthly	\$0.00
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Additional Minutes – TSB Carrier:

100 Anytime Additional Minutes	\$10.00
200 Anytime Additional Minutes	\$20.00
300 Anytime Additional Minutes	\$30.00

Additional Charges/Discounts:

Non-Lifeline Connection Fee:	\$5.00
Lifeline Connection Fee:	\$0.00

Texting: 3 texts per ONE minute of voice.

All plans include Caller ID, Call Waiting, and Voicemail.