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November 18, 2016

Oregon Public Utility Commission  
201 High Street SE  
Salem, OR 97301-3612

**Re: *Docket No. UM 1522 (Order No. 12-015) - Virgin Mobile USA, L.P.*  
(Assurance Wireless) Petition to Relinquish Eligible Telecommunications  
Carrier and Eligible Telecommunications Provider Designations Pursuant to  
47 U.S.C. §214(e)(4)**

Dear Oregon Commission,

Virgin Mobile USA, L.P. (“Virgin Mobile”), operating under the brand Assurance Wireless, hereby notifies the Oregon Public Utilities Commission (the “Commission”) that it is filing the attached Petition to Relinquish its Eligible Telecommunications Carrier and Eligible Telecommunications Provider designations (the “Petition”), conditioned upon the closing of a transaction between Virgin Mobile’s parent, Sprint Corporation (“Sprint”), and i-wireless, LLC (“i-wireless”), which is also a designated ETC in Oregon (the “Closing”). Following the Closing, Virgin Mobile seeks to relinquish its ETC designation, effective upon the completion of the migration of the Oregon Assurance Wireless customers to i-wireless.

Should the Commission have any questions regarding the Petition, please do not hesitate to contact me at the information set forth below.

Respectfully,

*/s/ Kristin L. Jacobson*

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

In the Matter of

VIRGIN MOBILE USA, L.P.,

Petition for Relinquishment of Eligible  
Telecommunications Carrier and Eligible  
Telecommunications Provider  
Designations

Docket No. UM 1522

**PETITION TO RELINQUISH ELIGIBLE TELECOMMUNICATIONS CARRIER  
AND ELIGIBLE TELECOMMUNICATIONS PROVIDER DESIGNATIONS  
PURSUANT TO 47 U.S.C. §214(e)(4)**

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November 18, 2016

**PETITION TO RELINQUISH ELIGIBLE TELECOMMUNICATIONS CARRIER AND  
ELIGIBLE TELECOMMUNICATIONS PROVIDER DESIGNATIONS PURSUANT TO  
47 U.S.C. §214(e)(4)**

Virgin Mobile USA, L.P. (“Virgin Mobile” and “Assurance Wireless”), by and through its undersigned counsel, and pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, respectfully requests to relinquish its designation as an eligible telecommunications carrier and an eligible telecommunications provider (collectively, “ETC”), conditioned upon the closing of a transaction between Virgin Mobile’s parent, Sprint Corporation (“Sprint”), and i-wireless, LLC (“i-wireless”), which is also a designated ETC in Oregon (the “Closing”). Following the Closing, Virgin Mobile seeks to relinquish its ETC designation effective upon the completion of the migration of the Oregon Assurance Wireless customers to i-wireless. As a result of the transaction and the migration of customers, Virgin Mobile’s Lifeline subscribers will seamlessly receive service from i-wireless, such that Virgin Mobile will no longer have any Oregon Lifeline subscribers.

In support of its request to relinquish, Virgin Mobile states as follows:

**I. BACKGROUND**

1. Virgin Mobile is a wholly-owned indirect subsidiary of Sprint. Virgin Mobile is a facilities-based provider of commercial mobile radio service (“CMRS”) throughout the United States using Sprint’s network infrastructure and wireless transmission facilities.

2. On January 23, 2012, the Oregon Public Utility Commission (“Commission”) designated Virgin Mobile as an ETC for the limited purpose of qualifying for federal Universal Service Fund subsidies for serving customers enrolled in the federal Lifeline program and for participation in the Commission’s Oregon Telephone Assistance Program (“OTAP”).<sup>1</sup> The service

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<sup>1</sup> *In the Matter of the Petition of Virgin Mobile USA, L.P. for Limited Designation as an Eligible Telecommunications Carrier*, Docket No. UM 1522, Order No. 12-015, *Disposition: Stipulation Adopted*:

area for Virgin Mobile’s ETC designation is set forth in Exhibit 2 of the Virgin Mobile Order.<sup>2</sup> Virgin Mobile provides Lifeline service in Oregon under the trade name “Assurance Wireless.”

3. i-wireless is jointly owned by The Kroger Co. and Genie Global, Inc., and operates as a mobile virtual network operator (“MVNO”) using Sprint’s network infrastructure and wireless transmission facilities to provide service. i-wireless has been designated as a wireless ETC in 39 states, including Oregon, and the District of Columbia to provide Lifeline services to low-income consumers under the brand “Access Wireless.”

4. On September 29, 2015, pursuant to a stipulation filed on August 28, 2015 (“Stipulation”), the Commission designated i-wireless as a wireless ETC to provide Lifeline services in Oregon.<sup>3</sup> Since that time i-wireless has worked to achieve operational readiness in conjunction with the Commission staff. As of this filing, i-wireless has demonstrated operational readiness to staff, and is approved to provide Lifeline benefits in Oregon under the terms of the Stipulation. i-wireless’ SAC for its Lifeline ETC service in Oregon is 539016. Pursuant to the Stipulation, updates to i-wireless’ rate plans, including those for Oregon Lifeline service, were filed in UM 1509 on October 12, 2016, and took effect on October 22, 2016.

5. On November 8, 2016, the Commission expanded i-wireless’ designated ETC service area in Oregon by adding additional Zip codes, such that i-wireless’ service area, based on

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*Petition Granted with Conditions; Partial Rules Waiver Granted* (rel. Jan. 23, 2012) (“*Virgin Mobile Order*”).

<sup>2</sup> *ID* at 26-31. The specific wire centers are identified in **Exhibit A** hereto.

<sup>3</sup> *In the Matter of i-wireless, LLC Application for Designation as an Eligible Telecommunications Carrier in Oregon for the Purpose of Offering Lifeline Service to Qualified Households*, Docket No. UM 1509, Order No. 15-300, *Disposition: Stipulation Adopted: Petition Granted with Conditions; Partial Rules Waiver Granted* (issued Sept. 29, 2015).

Zip codes, approximates the designated service area of Virgin Mobile.<sup>4</sup> i-wireless' expanded service area will allow it to serve all of Virgin Mobile's customers, though the boundaries of Virgin Mobile's wire center-based designated service area do not strictly align with those of i-wireless' Zip code-based designated service area.

6. On May 2, 2016, Sprint and i-wireless announced that they had entered into an agreement that will, in effect, unite Virgin Mobile's Lifeline activities with those of i-wireless (the "Transaction").<sup>5</sup> The Transaction includes the following primary components:

- Sprint will acquire an indirect 70% ownership interest in i-wireless.
- Virgin Mobile's Lifeline subscribers in Oregon will be transferred from Virgin Mobile to i-wireless, with no significant change in the terms or conditions of their service except the identity of the entity serving them. Virgin Mobile's Lifeline subscribers have been receiving 350 minutes of service and unlimited texts per month at no charge and as of December 2, pursuant to the FCC's new minimum service standards, will receive 500 voice minutes and unlimited texts per month. Upon transfer to i-wireless, they will receive 750 voice minutes per month as well as unlimited text and 50 MB data still at no charge.<sup>6</sup>
- Starting approximately 5 days after Closing, Lifeline applicants calling Assurance Wireless will be redirected to i-wireless to enroll in Lifeline service, using language discussed with and agreed to by Commission Staff.

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<sup>4</sup> *In the Matter of i-wireless, LLC Application for Designation as an Eligible Telecommunications Carrier*, Docket No. UM 1509, Order No. 16-426 (issued Nov. 8, 2016).

<sup>5</sup> In connection with the Transaction, i-wireless and Virgin Mobile filed an application with the FCC seeking consent to transfer international section 214 authorization from Genie and Kroger to Sprint. Copies of that application to the FCC and the FCC public notice approving the application are attached as Exhibit B.

<sup>6</sup> The 750 voice minutes per month consists of 500 voice minutes funded by the federal Lifeline benefit, plus 250 minutes funded by the OTAP.

- i-wireless' Lifeline subscribers in Oregon will receive Lifeline service pursuant to the Lifeline plans that took effect on October 22, 2016 and will not be impacted by the Transaction.

Because i-wireless, like Virgin Mobile, uses Sprint's network, the impact of the transition on Virgin Mobile's Oregon customers will be minimal.

7. The Transaction between Sprint and i-wireless will bring together Virgin Mobile's Lifeline subscribers and i-wireless' Lifeline subscribers to be served by a single entity –i-wireless – which will continue to operate under the name i-wireless, and will continue to use the trade name “Access Wireless.”

8. Oregon Lifeline subscribers of Virgin Mobile were informed of their impending transfer to i-wireless through notices provided in September, 2016. Specifically, through their Virgin Mobile Lifeline service, they received a text message (at no cost) containing a link to a dedicated webpage providing relevant information regarding the transaction. The text message also referred customers to a toll-free telephone number they can call to access an interactive voice recording (IVR) which provides the same information. In addition, the Access Wireless website has a separate page ([www.accesswireless/changeinprovider](http://www.accesswireless/changeinprovider)) providing the same information, and customer service representatives are available at both companies to answer additional questions.<sup>7</sup> Customers will receive additional notices at the time of Closing and, again, when their accounts are transferred to i-wireless, provided in a similar manner.

9. The Transaction is expected to close as soon as all regulatory approvals are obtained. The only outstanding regulatory item is the FCC approval of the i-wireless revised

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<sup>7</sup> The information that has been provided is set forth in **Exhibit C**.

compliance plan.<sup>8</sup> Because Virgin Mobile and i-wireless do not know when that approval will occur, we do not know the date of the Closing at this time. Virgin Mobile asks that its relinquishment be conditioned upon the Closing and that the effective date of the relinquishment be the date the migration of the Oregon Assurance Wireless customer accounts to i-wireless is complete. Virgin Mobile and i-wireless currently expect to complete the customer account migration by the end of January or beginning of February 2017, but those dates are subject to change. Virgin Mobile will file a status update with the Commission within 5 business days after Closing has occurred and will subsequently notify the Commission within 5 business days of the completion of the Oregon customer account migration. In this manner, as soon as its Lifeline subscribers have been transferred to i-wireless, Virgin Mobile will no longer be an ETC in Oregon.

## **II. VIRGIN MOBILE HAS MET THE REQUIREMENTS FOR ETC RELINQUISHMENT**

### **A. The Commission is Required to Permit The Requested Relinquishment**

10. In accordance with 47 U.S.C. § 214(e)(4), 47 C.F.R. § 54.205 and subject to the Closing and completion of the migration of the Oregon Assurance Wireless customer accounts to i-wireless, Virgin Mobile has determined to relinquish its ETC designation in Oregon. Federal law requires the Commission to permit the relinquishment of an ETC designation in any area served by at least one other ETC.

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<sup>8</sup> See i-wireless, LLC Amended Compliance Plan, WC Docket Nos. 09-197, 11-42 (filed June 24, 2016), attached as **Exhibit D**.

11. 47 U.S.C. § 214(e)(4) states, in pertinent part:

A State commission [...] shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission [...] of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission [...] shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunication carrier.

*Id.* (emphasis added).

12. FCC Rule 47 C.F.R. § 54.205 essentially reiterates the same requirements. It states that a “state commission shall permit” an ETC to “relinquish its designation as such a carrier in any area served by more than one” ETC. 47 C.F.R. § 54.205(a). It requires the ETC to “give advance notice to the state commission of such relinquishment.” *Id.* Finally, the rule requires State commissions to ensure that the relinquishing ETC’s subscribers will be served by the remaining (ETC)s and ensure sufficient notice to permit the purchase and construction of facilities if necessary. 47 C.F.R. § 54.205(b).

13. Virgin Mobile meets the applicable requirements. First, there are numerous ETCs, including Lifeline-only wireless ETCs, designated throughout Oregon. To the best of Virgin Mobile’s knowledge, each of the wire centers in which Virgin Mobile has been designated as an ETC will continue to be served by the incumbent local exchange carrier ETC, a Lifeline-only wireless ETC, or another competitive ETC. Most importantly, as part of the Transaction, all of Virgin Mobile’s existing Lifeline subscribers will continue to receive Lifeline service from i-



wireless. Other wireless ETCs authorized to serve Oregon include U.S. Cellular Corp., Boomerang Wireless, LLC, AT&T Mobility and TracFone Wireless, Inc.

14. Second, through this Petition, Virgin Mobile is providing the required notice. Third, to the best of Virgin Mobile's knowledge, none of the remaining ETCs, including i-wireless, will need to purchase or construct additional facilities to continue providing service within the wire centers comprising Virgin Mobile's designated area.

15. Accordingly, the Commission is required by law to permit the requested relinquishment conditioned upon closing of the Transaction and effective the date the customer migration to i-wireless is complete.

### **III. CORRESPONDENCE AND COMMUNICATIONS**

16. All correspondence and communications concerning this Petition should be directed to the following:

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*Counsel for i-wireless, LLC*

## **CONCLUSION**

For the foregoing reasons, Virgin Mobile respectfully requests that the Commission accept its notice of relinquishment of its ETC and ETP designations in Oregon. Virgin Mobile has demonstrated that it meets the requirements for relinquishment and following the close of the transaction with i-wireless and the complete migration of Oregon Assurance Wireless customers to i-wireless, it will no longer be an ETC in Oregon.

### **VIRGIN MOBILE USA, L.P.**

Dated: November 18, 2016

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## **List of Exhibits**

<b><u>Exhibit No.</u></b>	<b><u>Description</u></b>
A	Identification of wire centers comprising Virgin Mobile USA, L.P.'s ETC designated area
B	Virgin Mobile and i-wireless Application for Consent to Transfer Control of a Company Holding International Section 214 Authority Pursuant to the Communications Act of 1934, as Amended; FCC Public Notice approving Application
C	Information being provided to Virgin Mobile subscribers
D	i-wireless Amended Compliance Plan

**Exhibit A**

**VIRGIN MOBILE USA, L.P.  
OREGON WIRE CENTER LIST**

<u>WCOode</u>	<u>I L E C NAME</u>	<u>WIRE CENTER NAME</u>
BVCKORXA	BEAVER CREEK COOPERATIVE TELEPHONE CO.	BEAVER CREEK
CNBYORXA	CANBY TELEPHONE ASSOCIATION	CANBY
NEDYORXA	CANBY TELEPHONE ASSOCIATION	NEEDY
CRBTORXC	CASCADE UTILITIES, INC.	CORBETT
EGCKORXX	CASCADE UTILITIES, INC.	EAGLE CREEK
ESCDORXX	CASCADE UTILITIES, INC.	ESTACADA
RPBKORXX	CASCADE UTILITIES, INC.	RIPPLEBROOK
SCBGORXA	CASCADE UTILITIES, INC.	SCOTTSBURG
BDMNORXA	CENTURYTEL OF EASTERN OREGON	BOARDMAN
CHLQORXA	CENTURYTEL OF EASTERN OREGON	CHILOQUIN
DRANORXA	CENTURYTEL OF EASTERN OREGON	DRAIN
ECHORXA	CENTURYTEL OF EASTERN OREGON	ECHO
FTKLORXX	CENTURYTEL OF EASTERN OREGON	FT KLAMATH
GLCHORXA	CENTURYTEL OF EASTERN OREGON	GILCHRIST
GVC MORXA	CENTURYTEL OF EASTERN OREGON	GOVERNMENT CAMP
HPNRORXA	CENTURYTEL OF EASTERN OREGON	HEPPNER
IONEORXA	CENTURYTEL OF EASTERN OREGON	IONE
LXTNORXA	CENTURYTEL OF EASTERN OREGON	LEXINGTON
MRR LORXA	CENTURYTEL OF EASTERN OREGON	MERRILL
PLRKORXX	CENTURYTEL OF EASTERN OREGON	PILOT ROCK
RCPNORXA	CENTURYTEL OF EASTERN OREGON	ROCKY POINT
SHDDORXA	CENTURYTEL OF EASTERN OREGON	SHEDD
AURRORXA	CENTURYTEL OF OREGON, INC.	AURORA
BWVLORXX	CENTURYTEL OF OREGON, INC.	BROWNSVILLE
CHBUORXA	CENTURYTEL OF OREGON, INC.	CHARBONNEAU
CRWLORXA	CENTURYTEL OF OREGON, INC.	CRESWELL
DPBYORXX	CENTURYTEL OF OREGON, INC.	DEPOE BAY
GLNNORXA	CENTURYTEL OF OREGON, INC.	GLENEDEN BEACH
KNPPORXA	CENTURYTEL OF OREGON, INC.	KNAPPA
LBNNORXB	CENTURYTEL OF OREGON, INC.	LEBANON
SCPPORXA	CENTURYTEL OF OREGON, INC.	SCAPPOOSE
SWTHORXX	CENTURYTEL OF OREGON, INC.	SWEET HOME
YNCLORXA	CENTURYTEL OF OREGON, INC.	YONCALLA
RDL DORXX	CLEAR CREEK MUTUAL TEL. CO.	REDLAND
COTNORXA	COLTON TELEPHONE CO.	COLTON
ALOHARXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	ALOHA
AMTYORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	AMITY
AMVLORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	AUMSVILLE
BKNGORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	BROOKINGS
BNDNORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	BANDON
BNKSORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	BANKS
BVTNORXB	FRONTIER COMMUNICATIONS NORTHWEST, INC.	BEAVERTON
CLTSORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	CLATSKANIE
COVEORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	COVE
CQLLORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	COQUILLE
CSBYORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	COOS BAY
DYTNORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	DAYTON

EMPRORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	EMPIRE
FRGVORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	FOREST GROVE
GDISORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	GRAND ISLAND
GLBHORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	GOLD BEACH
GRHMORXB	FRONTIER COMMUNICATIONS NORTHWEST, INC.	GRESHAM
GSTNORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	GASTON
HDLDORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	HOOD LAND
HLBOORXB	FRONTIER COMMUNICATIONS NORTHWEST, INC.	HILLSBORO
LAGRORXB	FRONTIER COMMUNICATIONS NORTHWEST, INC.	LA GRANDE
LKSDORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	LAKESIDE
LNGLORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	LANGLOIS
MMVLORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	MCMINNVILLE
MRPHORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	MURPHY
MYPNORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	MYRTLE POINT
NBNDORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	NORTH BEND
NWBRORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	NEWBERG
ORNTORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	ORIENT
PTORORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	PORT ORFORD
RDPTORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	REEDSPORT
SCHLORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	SCHOLLS
SHWDORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	SHERWOOD
SLTNORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	SILVERTON
SMRWORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	SOMERSET
SNDYORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	WEST SANDY
SNSDORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	SUNNYSIDE
STFRORXX	FRONTIER COMMUNICATIONS NORTHWEST, INC.	STAFFORD
TGRDORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	TIGARD
TGRDORXC	FRONTIER COMMUNICATIONS NORTHWEST, INC.	BULL MOUNTAIN
TRNRORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	TURNER
TULTORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	TUALATIN
UNINORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	UNION
VYVWORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	VALLEY VIEW
WMLORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	WILSONVILLE
YMHORXA	FRONTIER COMMUNICATIONS NORTHWEST, INC.	YAMHILL
GRVSORXX	GERVAIS TELEPHONE CO. DBA DATAVISION COM	GERVAIS
HELXORXA	HELIX TELEPHONE CO.	HELIX
MCHMORXB	HELIX TELEPHONE CO,	MEACHAM
CNDNORXB	HOME TELEPHONE CO. OR	CONDON
MLLLORXA	MOLALLA TELEPHONE CO.	MOLALLA
MNTRORXA	MONITOR COOPERATIVE TELEPHONE CO,	MONITOR
MONRORXB	MONROE TELEPHONE CO.	MONROE
MTANORXA	MT. ANGEL TELEPHONE CO.	MT ANGEL
NHLMORXA	NEHALEM TELECOMS, INC. DBA NEHALEM	NEHALEM
DUFUORXA	NORTH - STATE TELEPHONE CO	DUFUR
LYNSORXA	PEOPLES TEL CO	LYONS
ADAROR21	QWEST CORPORATION	ADAIR
ALBYOR63	QWEST CORPORATION	ALBANY
ASLDOR	QWEST CORPORATION	ASHLAND
ASTROR64	QWEST CORPORATION	ASTORIA
ATHNOR56	QWEST CORPORATION	ATHENA-WESTON
BENDOR24	QWEST CORPORATION	BEND
BLBTOR01	QWEST CORPORATION	BLACK BUTTE

BURLOR62	QWEST CORPORATION	BURLINGTON
CLVROR01	QWEST CORPORATION	CULVER
CNBHOR64	QWEST CORPORATION	CANNON BEACH
CNPNOR29	QWEST CORPORATION	CENTRAL POINT
CRVSR	QWEST CORPORATION	CORVALLIS
CTGVOR53	QWEST CORPORATION	COTTAGE GROVE
DLLSOR58	QWEST CORPORATION	DALLAS
EUGNOR28	QWEST CORPORATION	EUGENE-RIVER ROAD
EUGNOR53	QWEST CORPORATION	EUGENE-10TH AVENUE
FLCYOR58	QWEST CORPORATION	FALLS CITY
FLRNOR53	QWEST CORPORATION	FLORENCE
GLHLOR55	QWEST CORPORATION	GOLD HILL
GRPSOR29	QWEST CORPORATION	GRANTS PASS
HMTNOR56	QWEST CORPORATION	HERMISTON
INDPOR58	QWEST CORPORATION	INDEPENDENCE
JCVLOR56	QWEST CORPORATION	JACKSONVILLE
JFSNOR63	QWEST CORPORATION	JEFFERSON
JNCYOR51	QWEST CORPORATION	JUNCTION CITY
KLFLOR54	QWEST CORPORATION	KLAMATH FALLS
LAPIOR52	QWEST CORPORATION	LAPINE
LKOSOR62	QWEST CORPORATION	LAKE OSWEGO
LWLLOR53	QWEST CORPORATION	LOW ELL
MDFDOR33	QWEST CORPORATION	MEDFORD
MDRSOR52	QWEST CORPORATION	MADRAS
MLTNOR56	QWEST CORPORATION	MILTON-FREEWATER
MLWKOR17	QWEST CORPORATION	MILWAUKIE
NPLNOR62	QWEST CORPORATION	NORTH PLAINS
NW PTO R35	QWEST CORPORATION	NEWPORT
NYSSORXC	QWEST CORPORATION	NYSSA
ONTRORXC	QWEST CORPORATION	ONTARIO
ORCYOR18	QWEST CORPORATION	OREGON CITY
ORSLORXC	QWEST CORPORATION	OREGON SLOPE
PHNXOR55	QWEST CORPORATION	PHOENIX
PNTNOR	QWEST CORPORATION	PENDLETON
PRVLOR53	QWEST CORPORATION	PRINEVILLE
PTLDOR02	QWEST CORPORATION	PORTLAND-CYPRESS
PTLDOR08	QWEST CORPORATION	PORTLAND – HAROLD
PTLDOR11	QWEST CORPORATION	PORTLAND – ALPINE
PTLDOR12	QWEST CORPORATION	PORTLAND - ATLANTIC
PTLDOR13	QWEST CORPORATION	PORTLAND - BELMONT
PTLDOR14	QWEST CORPORATION	PORTLAND – BUTLER
PTLDOR17	QWEST CORPORATION	PORTLAND – CHERRY
PTLDOR18	QWEST CORPORATION	PORTLAND-PROSPECT
PTLDOR69	QWEST CORPORATION	PORTLAND – CAPITOL
RANROR01	QWEST CORPORATION	RAINIER
RDMDOR01	QWEST CORPORATION	REDMOND
RGRVOR55	QWEST CORPORATION	ROGUE RIVER
RSBGOR57	QWEST CORPORATION	ROSEBURG
SALMOR58	QWEST CORPORATION	SALEM
SALMOR59	QWEST CORPORATION	KEIZER
SESDOR64.	QWEST CORPORATION	SEASIDE
SLTZOR66	QWEST CORPORATION	SILETZ

SPFDOR01	QW EST CORPORATION	SPRINGFIELD
SPRVOR02	QWEST CORPORATION	SPRING RIVER
SST ROR01	QWEST CORPORATION	SISTERS
STFDOR56	QWEST CORPORATION	STANFIELD
STHNOR40	QWEST CORPORATION	SAINT HELENS
STHROR58	QWEST CORPORATION	SUTHERLIN
TOLDOR66	QWEST CORPORATION	TOLEDO
UMTLOR57	QW EST CORPORATION	UMATILLA
VALEORXC	QW EST CORPORATION	VALE
VENTOR54	QW EST CORPORATION	VENETA
W DBNOR59	QWEST CORPORATION	WOODBURN
W LW LWA	QWEST CORPORATION	WALLA WALLA (OREGON PORTION
WNTNOR57	QWEST CORPORATION	WINSTON
W RTNOR64	QWEST CORPORATION	WARRENTON
WSPTOR64	QW EST CORPORATION	WESTPORT
HLSYORXB	ROOME TELECOMMUNICATIONS, INC,	HALSEY
SCIOORXX	SCIO MUTUAL TELEPHONE ASSOCIATION	SCIO
STPLORXX	ST PAUL COOPERATIVE TELEPHONE ASSOCIATIO	ST PAUL
STTNORXA	STAYTON COOPERATIVE	STAYTON
ARTNORXA	UNITED TELEPHONE - NORTHWEST	ARLINGTON
BEVRORXA	UNITED TELEPHONE - NORTHWEST	BEAVER
BYCYORXA	UNITED TELEPHONE - NORTHWEST	BAY CITY
CODLORXA	UNITED TELEPHONE NORTHWEST	CLOVERDALE
CRTOORXA	UNITED TELEPHONE - NORTHWEST	CARLTON
CSLCORXA	UNITED TELEPHONE - NORTHWEST	CASCADE LOCKS
GRBLORXA	UNITED TELEPHONE - NORTHWEST	GARIBALDI
GRRNORXA	UNITED TELEPHONE - NORTHWEST	GRANDE RONDE
HDRVORXA	UNITED TELEPHONE • NORTHWEST	HOOD RIVER
LNCYORXX	UNITED TELEPHONE • NORTHWEST	LINCOLN CITY
MOROORXA	UNITED TELEPHONE - NORTHWEST	MORO
MOSRORXX	UNITED TELEPHONE - NORTHWEST	MOSIER
ODLLORXX	UNITED TELEPHONE - NORTHWEST	ODELL
PCCYORXX	UNITED TELEPHONE • NORTHWEST	PACIFIC CITY
RKWYORXA	UNITED TELEPHONE - NORTHWEST	ROCKAWAY
RUFSORXA	UNITED TELEPHONE - NORTHWEST	RUFUS
SHCVORXX	UNITED TELEPHONE - NORTHWEST	SHADY COVE
SHRDOR	UNITED TELEPHONE - NORTHWEST	SHERIDAN
THDLOR	UNITED TELEPHONE - NORTHWEST	THE DALLES
TLMKORXA	UNITED TELEPHONE - NORTHWEST	TILLAMOOK
WASCORXA	UNITED TELEPHONE - NORTHWEST	WASCO
WLMNORXB	UNITED TELEPHONE - NORTHWEST	WILLAMINA
WHCYOR	UNITED TELEPHONE - NORTHWEST	WHITE CITY



**Exhibit B**

**FCC IBFS - Electronic Filing**

**Submission\_id :IB2016001464**

**Successfully filed on :Jun 23 2016 5:29:25:310PM**

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Approved by OMB  
3060-0686

**INTERNATIONAL SECTION 214 AUTHORIZATIONS  
FOR ASSIGNMENT OR  
TRANSFER OF CONTROL  
FCC FORM 214TC  
FOR OFFICIAL USE ONLY**

**APPLICANT INFORMATION**

Enter a description of this application to identify it on the main menu:

i-wireless, LLC / Sprint Corporation Intl. Section 214 Transfer of Control Application

1. Legal Name of Applicant			
Name:	i-wireless, LLC	Phone Number:	513-240-9800
DBA Name:		Fax Number:	859-261-6639
Street:	1 Levee Way Suite 3104	E-Mail:	paul.mcaleese@iwirelesshome.com
City:	Newport	State:	KY
Country:	USA	Zipcode:	41071 -
Attention:	Paul McAleese		
2. Name of Contact Representative			
Name:	Joshua T. Guyan	Phone Number:	202-342-8566
Company:	Kelley Drye & Warren, LLP	Fax Number:	202-342-8451
Street:	3050 K Street, NW #400	E-Mail:	kguyan@kelleydrye.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20007-
Attention:		Relationship:	Legal Counsel

**CLASSIFICATION OF FILING**

3. Choose the button next to the classification that best describes this filing. Choose only one.

a. Assignment of Section 214 Authority  
**An Assignment of an authorization is a transaction in which the authorization, or a portion of it, is assigned from one entity to another. Following an assignment, the authorization will usually be held by an entity other than the one to which it was originally granted. (See Section 63.24(b).)**

b. Transfer of Control of Section 214 Authority  
**A Transfer of Control is a transaction in which the authorization remains held by the same entity, but there is a change in the entity or entities that control the authorization holder. (See Section 63.24(c).)**

c. Notification of Pro Forma Assignment of Section 214 Authority ( **No fee required** )

d. Notification of Pro Forma Transfer of Control of Section 214 Authority ( **No fee required** )

Date of Consummation: **Must be completed if you select c or d.**

4. File Number(s) of Section 214 Authority(ies) for Which You Seek Consent to Assign or Transfer Control.  
Note: If the Section 214 Authorization Holder whose authority is being assigned or transferred does not have an "ITC" File No. under which it is operating, contact the Help Desk for assistance before proceeding further with this application. You cannot enter an "ITC-ASG" or "ITC-T/C" File No. in response to this question. Your response must

specify one or more "ITC" File Nos. Relevant "ITC-ASG" or "ITC-T/C" File Nos. should be listed only in Attachment 1 in response to Question 10.

File Number: ITC2142006072400363	File Number:	File Number:	File Number:	File Number:	File Number:	File Number:	File Number:
----------------------------------	--------------	--------------	--------------	--------------	--------------	--------------	--------------

5. Name of Section 214 Authorization Holder

Name: i-wireless, LLC Phone Number: 513-240-9800  
 DBA Name: Fax Number: 859-261-6639  
 Street: 1 Levee Way E-Mail: paul.mcaleese@iwirelesshome.com  
 Suite 3104  
 City: Newport State: KY  
 Country: USA Zipcode: 41071 -  
 Attention: Paul McAleese

6. Name of Assignor / Transferor

Name: The Kroger Co. Phone Number: 513-762-4437  
 DBA Name: Fax Number:  
 Street: 1014 Vine Street E-Mail: dorothea.roberts@kroger.com  
 City: Cincinnati State: OH  
 Country: USA Zipcode: 45202 -  
 Attention: Mrs Dorothy D Roberts

7. Name of Assignee / Transferee

Name: Sprint Corporation Phone Number: 703-433-4000  
 DBA Name: Fax Number: 703-433-4483  
 Street: 12502 Sunrise Valley Drive E-Mail:  
 M/S  
 City: Reston State: VA  
 Country: USA Zipcode: 20196 -  
 Attention: Kyle Entz

8a. Is a fee submitted with this application?

If Yes, complete and attach FCC Form 159.

If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).

- Governmental Entity  Noncommercial educational licensee  Notification of Pro Forma (No fee required.)  
 Other (please explain):

8b. You must file a separate application for each legal entity that holds one or more Section 214 authorizations to be assigned or transferred.

Fee Classification CUT - Section 214 Authority

9. Description (Summarize the nature of the application.)

Application for consent to transfer control of i-wireless, LLC to Sprint Corporation

10. In Attachment 1, please respond to paragraphs (c) and (d) of Section 63.18 with respect to the assignor/transferor and the assignee/transferee. Label your response "Answer to Question 10".

11. Does any entity, directly or indirectly, own at least ten (10) percent of the equity of the assignee/transferee as determined by successive multiplication in the manner specified in the note to Section 63.18(h) of the rules?  Yes  No

If you answered "Yes" to this question, provide in Attachment 1, the name, address, citizenship, and principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of the assignee/transferee, and the percentage of equity owned by each of those persons or entities (to the nearest one percent). Label your response "Answer to Question 11."

12. Does the assignee/transferee have any interlocking directorates with a foreign carrier?  Yes  No

If you answered "Yes" to this question, identify each interlocking officer/director in Attachment 1. (See Section 63.09(g).) Provide the name and position/title of the individual or entity, the name of the foreign carrier, and the country in which the foreign carrier is authorized to operate. Label your response: "Answer to Question 12."

13. Provide in Attachment 1 a narrative of the means by which the proposed assignment or transfer of control will take place. In circumstances of a substantial assignment or transfer of control pursuant to Section 63.24(e), where the assignor seeks authority to assign only a portion of its U.S. international assets and/or customer base, please specify whether the assignor requests authority to continue to operate under any or all of its international Section 214 File Nos. after consummation; and, if so, please specify in Attachment 1 each File No. it seeks to retain in its own name. Label your response "Answer to Question 13."

Note: The assignor may retain any or all of its international Section 214 File Nos. In that case, the assignor will continue to hold the international section 214 authorizations that it specifies in response to this question. The ITC-ASG File No. that the Commission assigns to this application will, when granted, constitute Commission authorization of the proposed assignment of assets and /or customers from the assignor to the assignee. Unless Commission grant of the assignment application specifies otherwise, the assignee may provide the same services on the same routes as permitted under the assignor's Section 214 authorization(s), and the assignee may provide such service to any customers it may obtain in the ordinary course of business.

If this filing is not a notification of a *pro forma* assignment or *pro forma* transfer of control, please respond to Questions 14-20 below. (See Section 63.24(d).) Otherwise, you may proceed to Question 21 below.

14. Check "Yes" below if the assignee is a foreign carrier or if, upon consummation of the proposed assignment or transfer of control, the Section 214 holder would be affiliated with a foreign carrier. (See Section 63.18 (i).) The terms "foreign carrier" and "affiliated" are defined in Section 63.09 (d) & (e) of the rules respectively.  Yes  No

If you answered "Yes" to this question, please specify in Attachment 1 each foreign country in which the assignee is a foreign carrier or in which the Section 214 holder, upon consummation, would be affiliated with a foreign carrier. Label your response, "Answer to Question 14."

15. If this application is granted and the proposed assignment or transfer is consummated, would the Section 214 holder be authorized to provide service to any destination country for which any of the following statements is true?  Yes  No

- (1) The Section 214 holder is a foreign carrier in that country; or
- (2) The Section 214 holder controls a foreign carrier in that country; or
- (3) Any entity that owns more than 25 percent of the Section 214 holder, or that controls the Section 214 holder, controls a foreign carrier in that country.
- (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Section 214 holder and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

If you answered "Yes" to this question, please specify in Attachment 1 each foreign carrier and country for which any of the above statements would be true. Label your response, "Answer to Question 15."

16. If you answered "Yes" to question 14, do you request classification of the Section 214 holder as a "non-dominant" carrier, upon consummation of the proposed transaction, between  Yes  No

the United States and *any or all* countries listed in response to Question 14? See Section 63.10 of the rules.

If you answered "Yes" to this question, you must provide information in Attachment 1 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination country route where it would be a foreign carrier, or would be affiliated with a foreign carrier and for which you request non-dominant classification. Label your response, "Answer to Question 16."

17. If you answered "Yes" to question 14 and you have not provided information in response to Question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination route where it would be a foreign carrier, or be affiliated with a foreign carrier, check "Yes" below to certify that the assignee/transferee agrees to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in the provision of international service between the United States and any foreign country(ies) for which you have not provided the required information.

Yes, I certify that I agree to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in my provision of international service between the United States and the following foreign country(ies):

No, Does not apply.

18. If you answered "Yes" to question 15, and if you have not provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules in its provision of service to each of the countries identified in response to question 15, the Section 214 holder may not be eligible to provide international telecommunications service between the U.S. and each such country following consummation of the assignment or transfer. In order to determine whether the public interest would be served by authorizing service on these U.S.-destination country routes, the assignee/transferee must provide information, in Attachment 1, to satisfy one of the showings specified in Section 63.18(k) of the rules. Label your response, "Answer to Question 18."

19. *If the assignee, or the Section 214 holder that is the subject of this transfer of control application, is a provider of Commercial Mobile Radio Services, you need not answer this question.*

If any of the Section 214 authorization(s) that would be assigned or transferred, authorize the Section 214 holder to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country listed in response to question 14, and unless you have provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10(a)(3) of the rules for each country, check "Yes" below to certify that the assignee/transferee will file the quarterly traffic reports required by Section 43.61(c) of the rules; and/or state in Attachment 1 that the foreign carrier(s) for which the applicant has not made a showing under Section 63.10(c)(3) do(es) not collect settlement payments from U.S. international carriers. (See Section 63.18(l).)

Yes, I certify that I agree to comply with the quarterly traffic reporting requirements set forth in section 43.61( c ) of the rules.

20. If the applicant desires streamlined processing pursuant to Section 63.12 of the rules, provide in Attachment 1 a statement of how the application qualifies for streamlined processing. (See Section 63.18(p).) Note that, if the application is being filed in connection with a sale of assets or reorganization of a carrier or its parent pursuant to the U.S. bankruptcy laws, the application may not be eligible for streamlined processing until final bankruptcy court approval of the proposed sale or reorganization.

Applicant certifies that its responses to questions 21 through 25 are true:

21. The assignee/transferee certifies that it has not agreed to accept special concessions directly or indirectly from a foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into any such agreements in the future.

Yes  No

22. By signing this application, the undersigned certify either (1) that the authorization(s) will not be assigned or that control of the authorization(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) that prior Commission consent is not required because the transaction is subject to the notification procedures for *pro forma* transactions under Section 63.24 of the rules. The assignee/transferee also acknowledges

Yes  No

that the Commission must be notified by letter within 30 days of a consummation or of a decision not to consummate. (See Section 63.24(e)(4).)

23. If this filing is a notification of a *pro forma* assignment or transfer of control, the undersigned certify that the assignment or transfer of control was *pro forma* and that, together with all previous *pro forma* transactions, does not result in a change in the actual controlling party.  Yes  No  Not a Pro Forma

24. The undersigned certify that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.  Yes  No

25. The assignee/transferee certifies that neither it nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.  Yes  No

### CERTIFICATION

26. Printed Name of Assignor / Transferor The Kroger Co.	29. Printed Name of Assignee / Transferee Sprint Corporation
27. Title (Office Held by Person Signing) Executive Vice President & Chief Financial Officer	30. Title (Office Held by Person Signing) Vice President, Federal & State Regulatory
28. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files) Michael Schlotman	31. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files) Charles W. McKee
<b>WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</b>	

### FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 8 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0686), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to [PRA@fcc.gov](mailto:PRA@fcc.gov). PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0686.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

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

<b>In the Matter of</b>	)	
	)	
<b>i-wireless, LLC</b>	)	
<i>Licensee</i>	)	
	)	
<b>Genie Global Inc. and The Kroger Co.</b>	)	<b>IBFS File No. ITC-214-_____</b>
<i>Transferors</i>	)	
	)	
<b>and</b>	)	
	)	
<b>Sprint Corporation</b>	)	
<i>Transferee</i>	)	
	)	
<b>Application for Consent to Transfer Control</b>	)	
<b>of a Company Holding International Section</b>	)	
<b>214 Authority Pursuant to the Communications</b>	)	
<b>Act of 1934, as Amended</b>	)	

**ATTACHMENT 1 TO APPLICATION FOR TRANSFER OF CONTROL**

i-wireless, LLC (“i-wireless” or the “Company”), Genie Global, Inc. (“Genie”), The Kroger Co. (“Kroger”), and Sprint Corporation (“Sprint”), for itself and its subsidiaries, (together with i-wireless, Genie, Kroger, and Sprint, the “Applicants”) hereby respectfully request authority pursuant to section 214 of the Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214, and sections 63.24(c) and (e) of the Commission’s rules, 47 C.F.R. §§ 63.24(c)/(e), for a transaction that will result in the transfer of control of i-wireless and its international section 214 authorization from Genie and Kroger to Sprint.<sup>1</sup>

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<sup>1</sup> This transaction also will involve the *pro forma* assignment of international wireless customer accounts from Virgin Mobile USA, L.P. (“Virgin Mobile”), a wholly owned subsidiary of Sprint, to i-wireless, which will become a majority-owned subsidiary of Sprint as a result of this



i-wireless, currently jointly owned by Genie and Kroger, provides commercial mobile radio services (“CMRS”) to consumers throughout the United States. The Company also is designated as an eligible telecommunications carrier (“ETC”) to provide wireless Lifeline services in 38 states and the District of Columbia.<sup>2</sup> Sprint, through its subsidiaries, offers a comprehensive range of wireless and wireline voice and data products and services. As discussed in more detail below, the Applicants have entered into an agreement pursuant to which Sprint will acquire an indirect 70 percent interest in i-wireless (the “Transaction”). Kroger and Genie will each retain half of the remaining 30 percent interest in i-wireless.

The Applicants seek streamlined treatment for this Application pursuant to section 63.12 of the Commission’s rules. *See* 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under section 63.12(c)(1)(ii) of the Commission’s rules because the foreign carriers with which Applicants will be affiliated after closing are not monopoly providers and, specifically, lack 50 percent market share in the international transport and local access markets on the foreign end of the route. Consequently, the Applicants qualify for a presumption of non-dominance pursuant to 47 C.F.R. § 63.10(a)(3).

## **I. DESCRIPTION OF THE APPLICANTS**

### **A. i-wireless, Kroger and Genie**

i-wireless (FRN: 0015302078) is a limited liability company organized under the laws of North Carolina. Its principal place of business is 1 Levee Way, Suite 3104, Newport, KY

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Transaction. This *pro forma* assignment will be subject to the post-closing notification procedures of 47 C.F.R. § 63.24(f).

<sup>2</sup> The Applicants are aware that separate approval of the Transaction must be obtained through the Commission’s Wireline Competition Bureau in connection with i-wireless’ approved compliance plan and designation as an ETC in states which default to the Commission for wireless ETC designations.

41071. i-wireless provides domestic and international CMRS to customers in 42 states and the District of Columbia and holds international section 214 authority from the Commission.<sup>3</sup> The Company has been designated as a wireless ETC to provide Lifeline services to low-income consumers in 38 states and the District of Columbia.

i-wireless is jointly owned by Genie, a Delaware corporation, and Kroger (NYSE: KR), one of the world's largest food retailers with operations in 35 states and the District of Columbia. i-wireless has no interest-holders or subsidiaries that offer domestic or international telecommunications services. The Company is not a foreign carrier and is not affiliated with foreign carriers in any market. A diagram showing the current corporate structure of i-wireless is provided as **Exhibit A**.

## **B. Sprint**

Sprint (NYSE: S) (FRN: 0022117618) is a Delaware corporation located at 6200 Sprint Parkway, Overland Park, KS 66251. Through its subsidiaries, Sprint provides wireless and/or wireline voice and data products and services to residential, business, government and reseller consumers throughout the United States and globally. Through intermediary entities, majority ownership of Sprint and its subsidiaries is held by Softbank Group Corp., a Japanese holding company.<sup>4</sup> A diagram showing the current corporate structure of Sprint is provided as **Exhibit B**.

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<sup>3</sup> See File No. ITC-214-20060724-00363 (granting authority to provide global or limited global facilities-based and resold international services, issued on March 27, 2007). The Company also holds such authorizations and registrations as may be required by individual states to operate as a wireless reseller.

<sup>4</sup> The current ownership of Sprint and its licensee subsidiaries was approved by the Commission in July 2013 following a thorough review of the public interest merits. Full CFIUS and federal agency ("Team Telecom") reviews were conducted as well, in view of the proposed majority ownership by a foreign entity. Following these reviews, the Commission concluded that SoftBank Group Corp.'s acquisition of the Sprint companies was in the public interest and noted several benefits likely to result with respect to market growth and innovative development of service offerings. *Applications of SOFTBANK CORP., Starburst II, Inc., Sprint Nextel*

## II. DESCRIPTION OF THE TRANSACTION – ANSWER TO QUESTION 13:

Pursuant to the terms of a Formation Agreement (“Agreement”) dated April 29, 2016, Applicants intend to combine their resources in a wireless services partnership that can respond both competitively and proactively to the Commission’s vision for a modernized Lifeline program.<sup>5</sup>

At closing, Sprint will acquire 70 percent of the indirect interests in i-wireless, resulting in control of the i-wireless section 214 authorization and international service operations. The remaining 30 percent interest in i-wireless will continue to be held in equal shares by Genie and Kroger, through a newly-formed holding company. The transaction will be essentially imperceptible for i-wireless’ customers. All existing customers of i-wireless will continue to be served by i-wireless pursuant to its existing international section 214 authorization.<sup>6</sup>

A diagram of the corporate structure of i-wireless and Sprint post-closing is provided as **Exhibit C**.

## III. PUBLIC INTEREST STATEMENT

Pursuant to section 214 of the Act, the Transaction may proceed if the Commission finds that the Transaction serves the public interest, convenience, and necessity. As discussed below,

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*Corporation, and Clearwire Corporation for Consent to Transfer Control of Licenses and Authorizations; Petitions for Reconsideration of Applications of Clearwire Corporation for Pro Forma Transfer of Control, Memorandum Opinion and Order, Declaratory Ruling, and Order on Reconsideration, 28 FCC Rcd 9642 (2013). Sprint recently petitioned the Commission for an updated section 310(b) declaratory ruling under the rules adopted by the Commission in 2013 (47 C.F.R. §§ 1.990 et seq.), and that petition is pending. See Petition for Declaratory Ruling of Sprint Corporation, IBFS File No. ISP-PDR-20160411-00006 (filed April 11, 2016).*

<sup>5</sup> See *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016).

<sup>6</sup> i-wireless serves its Lifeline customers base under the brand Access Wireless.

the Transaction fully meets this standard because it will yield tangible benefits for the public without harming customers or impairing market competition.

Specifically, the Transaction will benefit consumers, particularly those who participate in the Lifeline program. Combining the resources and expertise of Sprint, a nationwide facilities-based wireless carrier, and i-wireless, an innovative Lifeline service provider, will strengthen i-wireless as a wireless carrier. Going forward, i-wireless will be positioned to compete effectively in the evolving Lifeline market, which needs pioneering service providers. Moreover, this collaboration will strengthen the Company's ability to offer competitive international service plans to its customers.

At the same time, the Transaction will have no adverse effects on customers. Current i-wireless customers will continue to receive the same high-quality services they have always received. If this transaction closes before the new standalone voice performance standard (500 minutes per month) becomes effective on or around December 1, 2016, i-wireless customers who currently receive 250 minutes on their Lifeline service plan will be upgraded to the Assurance Wireless plan, which offers existing subscribers 350 minutes per month.

In addition, the Transaction holds no risk of anticompetitive impact on the international or U.S. domestic telecommunications markets. i-wireless operates solely as a reseller, does not own any network assets that could prove competitively significant, and serves a very small percentage of U.S. wireless subscribers. Thus, Sprint's acquisition of interests in i-wireless will not materially alter the competitive landscape.

#### **IV. INFORMATION REQUIRED BY SECTION 63.24(e) OF THE COMMISSION'S RULES**

The Applicants submit the following information pursuant to section 63.24(e) of the Commission's rule, including the information requested in section 63.18:

(a) Name, address and telephone number of the Applicants:

i-wireless, LLC  
1 Levee Way, Suite 3104  
Newport, KY 41071  
Tel: (513) 478-7529

Genie Global, Inc.  
1 Levee Way, Suite 3104  
Newport, KY 41071  
Tel: (513) 240-9800

The Kroger Co.  
1014 Vine St.  
Cincinnati, OH 45202-1100  
Tel: (513) 762-4000

Sprint Corporation  
6200 Sprint Parkway  
Overland Park, KS 66251  
Tel: 855-848-3280

(b) i-wireless is a North Carolina limited liability company. Genie is a Delaware corporation. Kroger is an Ohio corporation. Sprint is a Delaware corporation.

**Answer to Question 10, responding to paragraphs (c) and (d) of Section 63.18:**

(c) Correspondence concerning this Application should be sent to:

For i-wireless, Genie, and Kroger:

John J. Heitmann  
Joshua T. Guyan  
Counsel  
KELLEY DRYE & WARREN LLP  
3050 K Street NW, Suite 400  
Washington, D.C. 20007  
Tel: (202) 342-8566  
Email: jguyan@kelleydrye.com

For Sprint:

Emily J. H. Daniels  
Counsel  
Lawler, Metzger, Keeney & Logan, LLC  
1717 K Street NW, Suite 1075  
Washington, DC 20006  
Tel: (202) 777-7700  
Email: edaniels@lawlermetzger.com

with a copy to:

Paul McAleese  
Chief Executive Officer  
i-wireless, LLC  
1 Levee Way, Suite 3104  
Newport, KY 41071  
Email: Paul.McAleese@iwirelesshome.com

with a copy to:

Norina Moy  
Director, Government Affairs  
Sprint Corporation  
900 Seventh St. NW, Suite 700  
Washington, DC 20001  
Tel: (703) 433-4503  
Email: Norina.Moy@sprint.com

- (d) i-wireless holds international section 214 authority, granted in FCC File No. ITC-214-20060724-00363, to operate as a global or limited global facilities-based and resale carrier. Neither Genie nor Kroger holds telecommunications regulatory authority except through their interests in i-wireless. While Sprint does not directly hold any section 214 authority, other Sprint subsidiaries hold over 100 section 214 authorizations to provide international service. None of these authorizations are affected by this Transaction.<sup>7</sup>

**Answer to Question 11, responding to paragraph (h) of Section 63.18:**

- (h) The following individuals or entities hold a 10 percent or greater equity interest in the Transferee:<sup>8</sup>

Starburst I, Inc.  
c/o Sprint Corporation  
900 Seventh St. NW, Suite 700  
Washington, DC 20001  
Place of Organization: United States  
Principal Business: Investment holding company  
Interest Held: 77.5 percent direct equity interest in Sprint

SoftBank Group Corp.  
c/o Sprint Corporation  
900 Seventh St. NW, Suite 700  
Washington, DC 20001  
Place of Organization: Japan  
Principal Business: Holding company  
Interest Held: 83.4 percent indirect equity interest in Sprint

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<sup>7</sup> See, e.g., Application for Transfer of Control of Sprint Communications Co., L.P., from Sprint Nextel Corporation, Transferor, to SoftBank Corp. and Starburst II, Inc., Transferees, IBFS File No. ITC-T/C-20121116-00306 (filed Nov. 16, 2012), at Exhibit 1 to Attachment 1 (providing a complete listing of the section 214 authorizations held by Sprint's subsidiaries).

<sup>8</sup> The percentages included here reflect actual interests without application of the Commission's attribution rules. See 47 C.F.R. § 63.18 note to paragraph (h).

Masayoshi Son  
 c/o Sprint Corporation  
 900 Seventh St. NW, Suite 700  
 Washington, DC 20001  
 Country of Citizenship: Japan  
 Interest Held: 19.3 percent indirect equity interest in Sprint

Additionally, in an unrelated proposed corporate reorganization,<sup>9</sup> Sprint is seeking approval for a *pro forma* transaction whereby the following entity will be inserted into the vertical ownership chain above Sprint:

SoftBank International GK (formerly named BM Holdings GK)  
 c/o Sprint Corporation  
 900 Seventh St. NW, Suite 700  
 Washington, DC 20001  
 Place of Organization: Japan  
 Principal Business: Investment holding company  
 Interest to Be Held (subject to FCC approval and completion of proposed reorganization):  
 60.5 percent indirect equity interest in Sprint

**Answer to Question 12, responding to paragraph (h) of Section 63.18:**

Interlocking directorates with foreign carriers are listed in Exhibit D.

**Answer to Question 14, responding to paragraph (i) of Section 63.18:**

- (i) Sprint certifies that it is not a foreign carrier. Sprint is affiliated, as that term is defined by section 63.09 of the Commission’s rules, with foreign carriers as noted in Exhibit E.

**Answer to Question 15, responding to paragraph (j) of Section 63.18:**

- (j) Sprint certifies that neither Sprint nor i-wireless is a foreign carrier. The above-referenced entities that control and/or own more than 25 percent of Sprint also control and/or own more than 25 percent of foreign carriers. Post-closing, Sprint (through its subsidiaries) and i-wireless will provide international telecommunications service to the following destination countries in which they are affiliated with foreign carriers:

Name of Carrier	Country	WTO Status
SoftBank Corp.	Japan	WTO Member
BBIX International, Inc.	Japan	WTO Member
BBIX HONG KONG PTE LIMITED	Hong Kong, China	WTO Member

<sup>9</sup> See Applications for *Pro Forma* Transfer of Control, IBFS File Nos. SES-T/C-20160412-00345 and SES-T/C-20160412-00360, ULS File No. 0007217516 (filed April 11, 2016).

SOFTBANK TELECOM SINGAPORE PTE LTD.	Singapore	WTO Member
BBIX SINGAPORE PTE LTD.	Singapore	WTO Member

**Answer to Question 18, responding to paragraph (k) of Section 63.18:**

- (k) Not applicable. All of the foreign carriers identified in the preceding response to (j) are associated with WTO member countries.
- (l) (Reserved)

**Answer to Question 16, responding to paragraph (m) of Section 63.18:**

- (m) Applicants request classification as a “non-dominant” carrier between the United States and any or all countries listed in response to Question 14. Applicants qualify for non-dominant status pursuant to section 63.10 of the Commission’s rules because pursuant to section 63.10(a)(3), the foreign carrier affiliates identified in the response above are not monopoly providers and, specifically, lack 50 percent market share in the international transport and local access markets on the foreign end of the route.
- (n) As confirmed by the signatures of Applicants’ representatives to this Application, Applicants certify that they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route, and they will not enter into such agreements in the future.
- (o) As confirmed by the signatures of Applicants’ representatives to this Application, Applicants certify, pursuant to sections 1.2001 through 1.2003 of the Commission’s rules, that they are not subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

**Answer to Question 20, responding to paragraph (p) of Section 63.18:**

- (p) Applicants request streamlined processing of the international portion of this Application pursuant to section 63.12 of the Commission’s rules, 47 C.F.R. § 63.12. This Application qualifies for streamlined treatment under section 63.12(c)(1)(ii) of the Commission’s rules because the foreign carriers with which Applicants will be affiliated post-closing are not monopoly providers and, specifically, lack 50 percent market share in the international transport and local access markets on the foreign end of the route. Consequently, Applicants qualify for a presumption of non-dominance pursuant to section 63.10(a)(3).



**V. CONCLUSION**

Based on the foregoing, the Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by grant of this Application.

Respectfully submitted,

**i-wireless, LLC  
Genie Global, Inc.**

*/s/ Paul McAleese*

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Paul McAleese  
1 Levee Way, Suite 3104  
Newport, KY 41071  
(513) 478-7529

**The Kroger Co.**

*/s/ Michael Schlotman*

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Michael Schlotman  
Executive Vice President and Chief Financial Officer  
1014 Vine Street  
Cincinnati, Ohio 45202  
(513) 762-4000

**Sprint Corporation**

*/s/ Charles W. McKee*

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Charles W. McKee  
Vice President, Federal and State Regulatory  
900 Seventh St. NW, Suite 700  
Washington, DC 20001  
(703) 433-3786

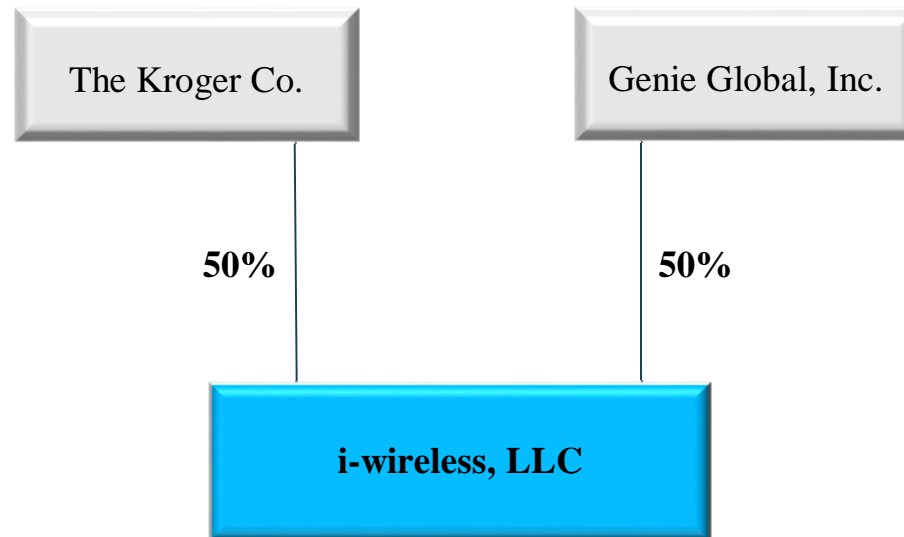
Date: June 23, 2016

**LIST OF EXHIBITS**

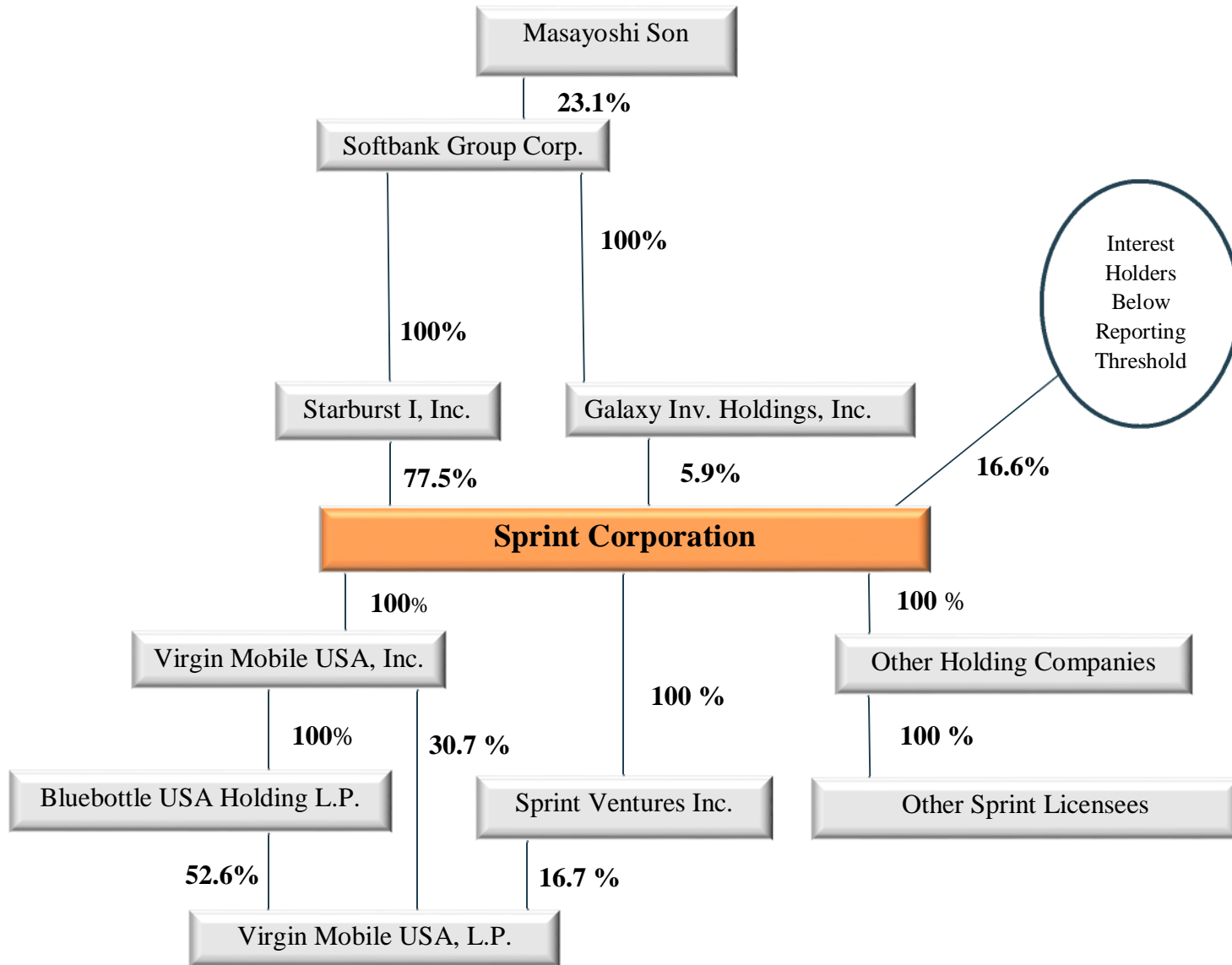
<b>EXHIBIT A</b>	<b>Pre-closing i-wireless Corporate Structure</b>
<b>EXHIBIT B</b>	<b>Pre-closing Sprint Corporate Structure</b>
<b>EXHIBIT C</b>	<b>Post-closing Sprint and i-wireless Corporate Structure</b>
<b>EXHIBIT D</b>	<b>Interlocking Directorate Information</b>
<b>EXHIBIT E</b>	<b>Sprint Foreign Affiliates</b>

## Exhibit A

### Pre-closing i-wireless Corporate Structure

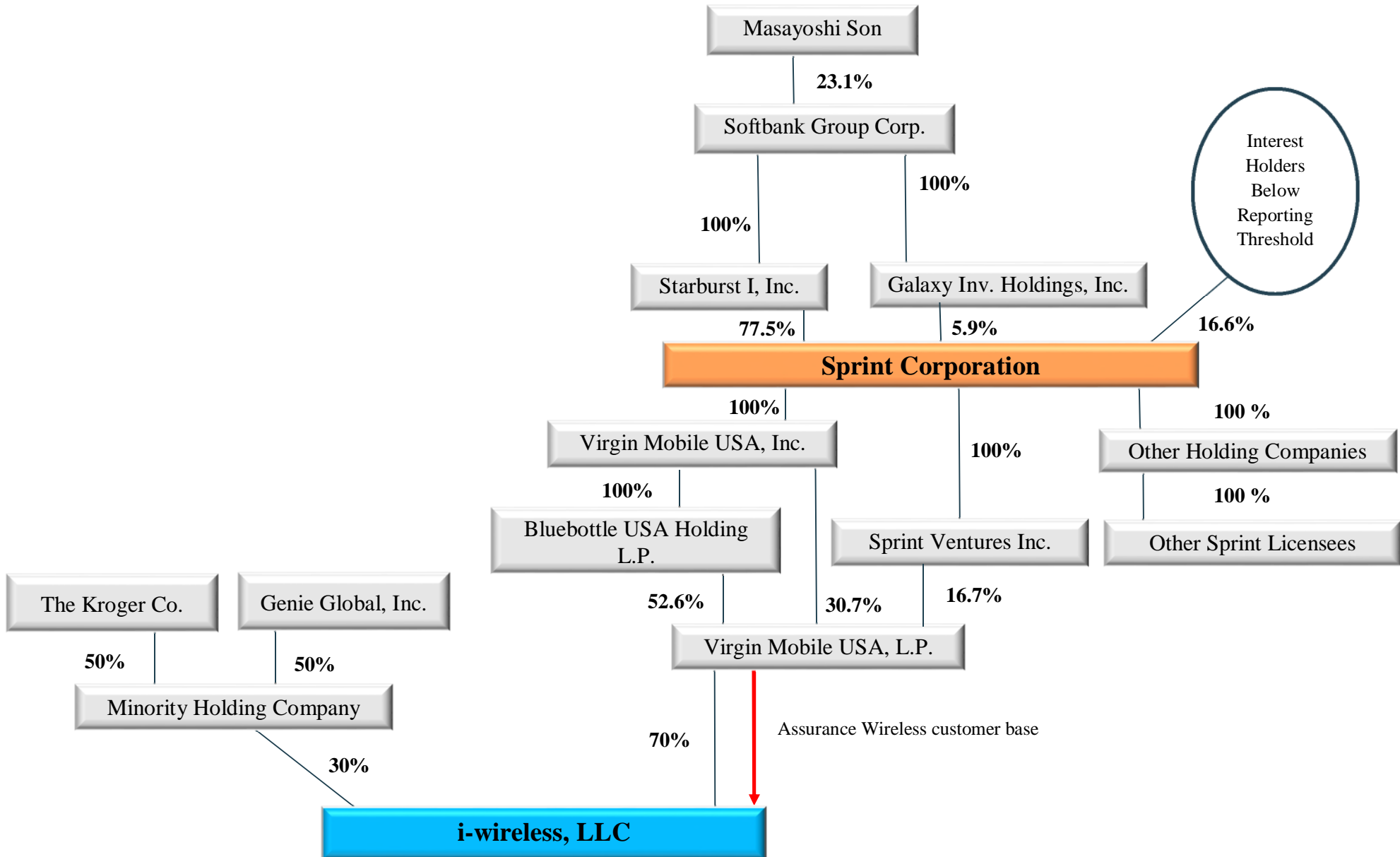


## Exhibit B Pre-Closing Sprint Corporate Structure



# Exhibit C

## Post-closing Sprint and i-wireless Corporate Structure



**Exhibit D**  
**Interlocking Directorate Information**

Answer to Question 12, responding to paragraph (h) of Section 63.18:

Timothy P. O'Grady, Vice President and Corporate Secretary of Sprint Corporation, is also an officer or director of the following foreign carriers:

- Alternate General Manager, Sprint International Colombia Ltda. (in Colombia)
- Director, SprintLink Ireland Ltd (in Ireland)
- Director, Sprint International Holding, Inc (Japanese Branch) (in Japan)

Stefan K. Schnopp, Assistant Secretary of Sprint Corporation is also an officer or director of the following foreign carriers:

- Director, Sprint International Australia Pty Ltd (in Australia)
- Director, Sprint International Austria GmbH (in Austria)
- Manager, SprintLink Belgium BVBA (in Belgium)
- Director, President and Secretary, Sprint International Communications Canada ULC (in Canada)
- Representative, Sprint International Chile Ltda (in Chile)
- General Manager, Sprint International Colombia Ltda. (in Colombia)
- Managing Director, Sprint International Czech Republic S.R.O. (in the Czech Republic)
- Director, SprintLink Denmark ApS (in Denmark)
- President, Sprintlink France SAS (in France)
- Director, SprintLink Germany GmbH (in Germany)
- Director, Sprint Hong Kong Ltd (in Hong Kong)
- Managing Director, Sprint International Hungary (in Hungary)
- Director, SprintLink Ireland Ltd (in Ireland)
- Sole Director, SprintLink Italy S.r.l. (in Italy)
- Director and Representative Director, Sprint International Japan Corporation (in Japan)
- Director, Sprint International Holding, Inc (Japanese Branch) (in Japan)
- Director, Sprint International Korea (in Korea)
- Managing Director, Sprintlink International Malaysia SDN. BHD. (in Malaysia)
- Sole Manager, SIHI Mexico S. de R.L. de C.V. (in Mexico)
- Director, SprintLink Netherlands B.V. (in the Netherlands)
- Director, Sprint International New Zealand (in New Zealand)
- Chairman, Sprint International Norway AS (in Norway)
- President of the Management Board, Sprintlink Poland sp. z o.o. (in Poland)
- Director, Sprint International Communications Singapore Pte Ltd (in Singapore)
- Sole Director, Sprint International Spain, S.L. (in Spain)
- Board Member and Chairman, SIHI Scandinavia AB (in Sweden)
- Manager-President, SprintLink International (Switzerland) GmbH (in Switzerland)
- Director, Sprint International Taiwan Ltd. (in Taiwan)

- Director, Sprint (Thailand) Limited (in Thailand)
- Director, SprintLink UK Ltd (in the United Kingdom)
- Director, Sprint International Venezuela, S.R.L. (in Venezuela)

Masayoshi Son, Chairman of the Board of Directors of Sprint Corporation. He is Chief Executive Officer and Chairman of the Board of SoftBank Group Corp. Mr. Son serves in various capacities within SoftBank's portfolio of companies, including Chairman of SoftBank Corp. (the Japan-based telecommunications operator).

Ronald D. Fisher serves on the Board of Directors of Sprint Corporation. He currently serves as a Director and President of SoftBank Holdings Inc. and serves as a Director of SoftBank Group Corp.

Nikesh Arora serves on the Board of Directors of Sprint Corporation. He also serves as President and Chief Operating Officer of SoftBank Group Corp. and CEO of SB Group US, Inc. Mr. Arora currently serves as a Representative Director of SoftBank Group Corp.

Junichi Miyakawa is an officer of Sprint Corporation. He also serves as a Director of SINGAPORE PTE LTD., BBIX HONG KONG PTE LIMITED, and BBIX International, Inc.

**Exhibit E**  
**Sprint Foreign Affiliates**

- SoftBank Corp.
- SOFTBANK TELECOM SINGAPORE PTE LTD.
- BBIX SINGAPORE PTE LTD.
- BBIX HONG KONG PTE LIMITED
- BBIX International, Inc.
- Sprint International Argentina SRL (in Argentina)
- Sprint International Australia Pty Ltd (in Australia)
- Sprint International Austria GmbH (in Austria)
- SprintLink Belgium BVBA (in Belgium)
- Sprint Brasil Servicos de Telecomunicacoes Ltda. (in Brazil)
- Sprint International Communications Canada ULC (in Canada)
- Sprint International Chile Ltda (in Chile)
- Sprint International Colombia Ltda. (in Colombia)
- Sprint International Czech Republic S.R.O. (in the Czech Republic)
- SprintLink Denmark ApS (in Denmark)
- Sprintlink France SAS (in France)
- SprintLink Germany GmbH (in Germany)
- Sprint Hong Kong Ltd (in Hong Kong)
- Sprint International Hungary (in Hungary)
- SprintLink Ireland Ltd (in Ireland)
- SprintLink Italy S.r.l. (in Italy)
- Sprint International Japan Corporation (in Japan)
- Sprint International Holding, Inc (Japanese Branch) (in Japan)
- Sprint International Korea (in Korea)
- Sprintlink International Malaysia SDN. BHD. (in Malaysia)
- SIHI Mexico S. de R.L. de C.V. (in Mexico)
- SprintLink Netherlands B.V. (in the Netherlands)
- Sprint International New Zealand (in New Zealand)
- Sprint International Norway AS (in Norway)
- Sprintlink Poland sp. z o.o. (in Poland)
- Sprint RUS LLC (Russia)
- Sprint International Communications Singapore Pte Ltd (in Singapore)
- Sprint International Spain, S.L. (in Spain)
- SIHI Scandinavia AB (in Sweden)
- SprintLink International (Switzerland) GmbH (in Switzerland)
- Sprint International Taiwan Ltd. (in Taiwan)
- Sprint (Thailand) Limited (in Thailand)
- SprintLink UK Ltd (in the United Kingdom)
- Sprint International Venezuela, S.R.L. (in Venezuela)





# PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION  
445 12th STREET S.W.  
WASHINGTON D.C. 20554

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News media information 202-418-0500  
Internet: <http://www.fcc.gov> (or <ftp.fcc.gov>)  
TTY (202) 418-2555

DA No. 16-827

Report No. TEL-01804

Thursday July 21, 2016

## International Authorizations Granted

### Section 214 Applications (47 C.F.R. § 63.18); Section 310(b) Requests

The following applications have been granted pursuant to the Commission's streamlined processing procedures set forth in Section 63.12 of the Commission's rules, 47 C.F.R. § 63.12, other provisions of the Commission's rules, or procedures set forth in an earlier public notice listing applications accepted for filing.

Unless otherwise noted, these grants authorize the applicants (1) to become a facilities-based international common carrier subject to 47 C.F.R. § 63.22; and/or (2) to become a resale-based international common carrier subject to 47 C.F.R. § 63.23; or (3) to exceed the foreign ownership benchmark applicable to common carrier radio licensees under 47 U.S.C. § 310(b).

THIS PUBLIC NOTICE SERVES AS EACH NEWLY AUTHORIZED CARRIER'S SECTION 214 CERTIFICATE. It contains general and specific conditions, which are set forth below. Newly authorized carriers should carefully review the terms and conditions of their authorizations. Failure to comply with general or specific conditions of an authorization, or with other relevant Commission rules and policies, could result in fines and forfeitures.

Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's rules in regard to the grant of any of these applications may be filed within thirty days of this public notice (see 47 CFR § 1.4(b)(2)).

For additional information, please contact the FCC Reference and Information Center, Room CY-A257, 445 12th Street SW, Washington, D.C. 20554, (202) 418-0270.

Petition for Declaratory Ruling

Grant of Authority

Date of Action: 06/30/2016

Sprint Corporation (Sprint), on behalf of its wholly-owned, U.S. subsidiaries holding common carrier wireless licenses (Joint Petitioners), has filed a petition with the Commission for a declaratory ruling (Petition) pursuant to section 310(b)(4) of the Communications Act of 1934, as amended, 47 U.S.C. § 310(b)(4), and section 1.990(a)(1) of the Commission's rules, 47 CFR § 1.990(a)(1), that it would not serve the public interest to prohibit more than 25 percent foreign ownership in the Joint Petitioners. The Petition is being filed in connection with a planned internal restructuring with respect to the intermediate holding companies through which Softbank Group Corp. (SoftBank) holds its majority (83.4%) controlling ownership interest in Sprint. Pursuant to the planned pro forma restructuring, SoftBank will introduce a new, wholly-owned subsidiary, SoftBank Group International GK (SoftBank Group Int'l), into Sprint's vertical chain of ownership. SoftBank Group Int'l is organized in Japan as a "godo kaisha," which is analogous to a limited liability company.

The Petition notes that the Commission reviewed and approved the current ownership structure of and foreign interests in Sprint and the Joint Petitioners in the Sprint/SoftBank Order, FCC 13-92, 28 FCC Rcd 9642 (2013) (Sprint/SoftBank Order). In particular, and subject to certain conditions, the Commission's foreign ownership ruling authorized Sprint, the controlling U.S.-organized parent of the Joint Petitioners, to be 100 percent owned by SoftBank (individually) and by SoftBank's shareholders (collectively, including Mr. Masayoshi Son). SoftBank is a publicly traded joint stock corporation organized in Japan. Mr. Son is a citizen of Japan and serves as SoftBank's Chief Executive Officer and Chairman of the Board of Directors. Mr. Son currently holds 23.1 percent of SoftBank's equity and voting interests. Sprint certifies in the Petition that it is in compliance with the foreign ownership ruling issued in the Sprint/SoftBank Order.

Currently, Softbank holds its 83.4 percent equity and voting interest in Sprint through two wholly-owned U.S. subsidiaries: Starburst I, Inc. (Starburst I) (77.5% direct equity and voting interest in Sprint) and Galaxy Investment Holdings, Inc. (Galaxy) (5.9% direct equity and voting interest in Sprint). The remaining 16.6 percent of Sprint's outstanding stock is widely held by diverse shareholders. The Petition states, pursuant to Sections 1.991(i) and 1.991(e)-(f) of the rules, respectively, that none of these shareholders are foreign individuals or entities holding a greater than five percent equity or voting interest in Sprint, and that none of these shareholders (U.S. or foreign) hold a 10 percent or greater equity or voting interest in Sprint.

After the planned reorganization, SoftBank Group Int'l will hold an aggregate 60.5 percent indirect equity interest in Sprint through Starburst I and Galaxy, consisting of: a direct 70.4 percent equity interest in Starburst I and, in turn, an indirect 54.6 percent equity in Sprint through Starburst I ( $70.4\% \times 77.5\% = 54.6\%$ ) plus a direct 100 percent equity interest in Galaxy and, in turn, an indirect 5.9 percent equity interest in Sprint ( $54.6\% + 5.9\% = 60.5\%$ ). SoftBank will hold directly the remaining 29.6 percent equity interest in Starburst I and, thus, an indirect 22.9 percent equity interest in Sprint through Starburst I ( $29.6\% \times 77.5\% = 22.9\%$ ). Because SoftBank wholly owns SoftBank Group Int'l, SoftBank would hold an aggregate 83.4 percent indirect equity interest in Sprint ( $60.5\% + 22.9\% = 83.4\%$ ), the same level as it holds under SoftBank's current ownership structure. Mr. Son's indirect equity interest in Sprint similarly would not change from the current 19.3% amount ( $23.1\% \times 83.4\% = 19.3\%$ ).

The post-closing indirect voting interests of SoftBank Group Int'l and SoftBank would track their indirect equity interests in Sprint (i.e., 60.5% and 83.4%, respectively). The Petition explains further that, because their respective indirect voting interests in Sprint would exceed 50%, each of SoftBank Group Int'l and SoftBank would be viewed as holding a 100 percent indirect voting interest in Sprint under Sections 1.991(f) and 1.992 of the rules. As a result, Mr. Son's post-closing indirect voting interest in Sprint (held through SoftBank and its intervening holding companies) would be calculated as 23.1% ( $23.1\% \times 100\%$ ).

Sprint states that under the rules adopted in the Foreign Ownership Second Report and Order, FCC 13-50, 28 FCC Rcd 5741 (2013), 78 Fed. Reg. 41314 (July 10, 2013), Commission approval is not required for a pro forma transaction such as the transaction related to this Petition. However, because the foreign ownership ruling granted in the Sprint/SoftBank Order was issued prior to the effective date of the rules adopted in the Foreign Ownership Second Report and Order, Sprint seeks a new foreign ownership ruling pursuant to the new rules. In doing so, Sprint notes that it will continue to be subject to the terms of a National Security Agreement (NSA) entered into as a precondition to clearance of the Sprint/SoftBank transaction by the Committee on Foreign Investment in the United States (CFIUS) (see Sprint/SoftBank Order, 28 FCC Rcd at 9693-9696, paras. 125-131). The Petition states that, once the proposed transaction closes, SoftBank Group Int'l will be automatically covered by the NSA.

In addition, pursuant to section 1.991(i) of the rules, Sprint requests that the Commission specifically approve the above-described, post-closing foreign equity and voting interests that would be held directly or indirectly in Sprint, the controlling U.S. parent of Joint Petitioners, by SoftBank Group Int'l, SoftBank Group Corp., and Mr. Masayoshi Son. Pursuant to section 1.991(k)(1) of the rules, Sprint also requests advance approval for SoftBank and SoftBank Group Int'l to increase their interests in Sprint up to and including 100 percent of Sprint's direct and/or indirect equity and/or voting interests. Pursuant to section 1.991(k)(2) of the rules, Sprint also requests advance approval for Mr. Masayoshi Son to increase his direct and/or indirect equity and/or voting interests in Sprint up to and including a non-controlling 49.99 percent.

The Petition states that the purpose of the reorganization is to separate SoftBank's global and domestic operations. It states that grant of the Petition will serve the public interest by providing greater transparency to SoftBank's shareholders, increasing efficiency in SoftBank's corporate operations, and improving SoftBank's value, which in turn will allow SoftBank to be better positioned to manage and invest in Sprint's operations over the long term.

Pursuant to the rules and policies established by the Commission's Foreign Ownership Second Report and Order, we find that the public interest would not be served by prohibiting foreign ownership of the Joint Petitioners in excess of the 25 percent benchmark in section 310(b)(4) of the Act. Specifically, this ruling permits aggregate foreign equity and voting interests in the Joint Petitioners' controlling U.S. parent company, Sprint, to exceed 25 percent of its equity and/or voting interests, subject to the terms and conditions set forth in section 1.994 of the Commission's rules, 47 CFR § 1.994, including the requirement to obtain Commission approval before its foreign ownership exceeds the terms and conditions of this ruling. In addition, this ruling specifically permits: SoftBank and SoftBank Group Int'l, individually or collectively, to increase their equity and/or voting interests, at some future time, up to and including 100 percent of the direct and/or indirect equity and/or voting interests of Sprint; and Mr. Masayoshi Son to increase his equity and/or voting interests, at some future time, up to and including a non-controlling direct and/or indirect 49.99 percent equity and/or voting interest in Sprint.

The Joint Petitioners have an affirmative duty to monitor their foreign equity and voting interests, calculate these interests consistent with the standards and criteria set forth in sections 1.992 through 1.993 of the Commission's rules, 47 CFR §§ 1.992-1.993, and otherwise ensure continuing compliance with the provisions of section 310(b) of the Act.

Grant of this declaratory ruling is without prejudice to the Commission's action on any other related pending application(s).

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**ITC-214-20160617-00173** E GoPro Communication, LLC  
International Telecommunications Certificate  
**Service(s):** Global or Limited Global Resale Service  
Grant of Authority Date of Action: 07/15/2016

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

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**ITC-214-20160622-00172** E USTelco, LLC  
International Telecommunications Certificate  
**Service(s):** Global or Limited Global Resale Service  
Grant of Authority Date of Action: 07/15/2016

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

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**ITC-214-20160623-00171** E Universal Calling Inc.  
International Telecommunications Certificate  
**Service(s):** Global or Limited Global Resale Service  
Grant of Authority Date of Action: 07/15/2016

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

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**ITC-214-20160623-00178** E Miles Cooperative Telephone Association  
International Telecommunications Certificate  
**Service(s):** Global or Limited Global Resale Service  
Grant of Authority Date of Action: 07/15/2016

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

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**ITC-214-20160629-00176** E Phillips County Telephone Company  
International Telecommunications Certificate  
**Service(s):** Global or Limited Global Resale Service  
Grant of Authority Date of Action: 07/15/2016

Application for authority to provide resale service in accordance with section 63.18(e)(2) of the Commission's rules, 47 C.F.R. § 63.18(e)(2).

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**ITC-ASG-20160426-00157** E

Everstream GLC Holding Company LLC

Assignment

Grant of Authority

Date of Action: 07/15/2016

**Current Licensee:** Great Lakes Comnet, Inc. - Debtor in Possession

**FROM:** Great Lakes Comnet, Inc. - Debtor in Possession

**TO:** Everstream GLC Holding Company LLC

Application filed for consent to the assignment of international section 214 authorization, ITC-214-19970116-00027, held by Great Lakes Comnet, Inc. - Debtor in Possession (Great Lakes Comnet), to Everstream GLC Holding Company LLC (Everstream GLC). On January 25, 2016, Great Lakes Comnet and its subsidiary, Comlink, LLC (Comlink), filed Voluntary Petitions for Reorganization under Chapter 11 of the Bankruptcy Code. See In re Great Lakes Comnet, Inc. and Comlink, LLC, Case Nos. 16-00290 and 16-00292 (Bankruptcy Court, WD Mich). On January 29, 2016, the parties entered into an Asset Purchase Agreement, pursuant to which Everstream will acquire certain assets of Great Lakes Comnet and Comlink. The Bankruptcy Court approved the sale at a hearing on May 10, 2016.

Everstream GLC is an indirect subsidiary of Everstream Holding Company, LLC (Everstream Holding). M/C Partners VII, L.P. (M/C Partners) holds 80% of the equity of Everstream Holding. Applicants state that no person or entity owns a ten percent or greater interest in M/C Partners. The following U.S. citizens are M/C Partners members: Gillis S. Cashman; Brian M. Clark; David D. Croll; Robert Savignol; James F. Wade; and John W. Watkins.

Applicants filed a request for Special Temporary Authority (STA), ITC-STA-20160426-00158, related to this transaction, which was granted on May 26, 2016.

This authorization is without prejudice to the Commission's action in any other related pending proceedings.

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**ITC-ASG-20160630-00181** E

New Cingular Wireless PCS, LLC

Assignment

Grant of Authority

Date of Action: 07/20/2016

**Current Licensee:** Centaur Acquisition Company LLC

**FROM:** Centaur Acquisition Company LLC

**TO:** New Cingular Wireless PCS, LLC

Notification filed June 30, 2016, of the pro forma assignment of international section 214 authorization, ITC-214-20150204-00027, held by Centaur Acquisition Company LLC (Centaur) to New Cingular Wireless PCS, LLC (New Cingular), effective May 31, 2016. New Cingular and Centaur were both indirect wholly owned subsidiaries of AT&T Inc. (AT&T). Pursuant to an internal reorganization, Centaur was merged into New Cingular and eliminated. New Cingular now holds, ITC-214-20150204-00027. AT&T continues to control New Cingular after the merger.

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**ITC-T/C-20150910-00220** E

Alteva Long Distance, Inc.

Transfer of Control

Grant of Authority

Date of Action: 10/23/2015

**Current Licensee:** Alteva Long Distance, Inc.

**FROM:** Alteva, Inc

**TO:** MBS Holdings, Inc.

Application filed for consent to the transfer of control of international section 214 authorization, ITC-214-19931022-00192, held by Alteva Long Distance, Inc. (Alteva-LD), a wholly-owned subsidiary of Alteva, Inc. (Alteva), a publicly held New York corporation, to MBS Holdings, Inc. (MBS), a Delaware corporation. Pursuant to a September 2, 2015, Agreement and Plan of Merger, Arrow Merger Subsidiary, Inc., a wholly-owned subsidiary of MBS Intermediate Holdings, LLC (MBS Intermediate), which in turn is a wholly-owned subsidiary of MBS, will merge with and into Alteva, with Alteva emerging as the surviving entity. Upon consummation, Alteva will become a wholly-owned direct subsidiary of MBS Intermediate, and an indirect subsidiary of MBS. Alteva-LD will remain a direct subsidiary of Alteva, and become an indirect subsidiary of MBS upon closing.

The following entities or individuals will hold ten percent or greater direct or indirect ownership interest in MBS: (1) The Estate of William W. Featheringill (Estate) will own 14.5 percent of the total preferred equity of MBS. Carolyn Featheringill, a U.S. citizen, is the Trustee of the Estate; (2) Featheringill Investment Group, LLC (Featheringill Investment), an Alabama limited liability company, will own 12.4 percent of the total preferred equity of MBS. Featheringill Investment is controlled by Carolyn Featheringill, a U.S. citizen; (3) Ramsey Management LLC (Ramsey Management), an Alabama limited liability company, will own 11.8 percent of the total preferred equity of MBS. Ramsey Management is controlled by Carolyn Featheringill, a U.S. citizen; and (4) Pharo Investment Group, LLC (Pharo), an Alabama limited liability company, will own 11.1 percent of the total preferred equity of MBS. Pharo Investment is controlled by Elizabeth Pharo, a U.S. citizen. No other entity or individual will hold a ten percent or greater direct or indirect equity or voting interest in MBS.

This authorization is without prejudice to the Commission's action in any other related pending proceedings.

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**ITC-T/C-20151221-00308** E SatCom Global, Inc.

Transfer of Control

Grant of Authority

Date of Action: 07/20/2016

**Current Licensee:** SatCom Global, Inc.

**FROM:** Broadband Satellite Services Limited

**TO:** Broadband Satellite Services Limited

Notification filed December 21, 2015, of the pro forma transfer of control of international section 214 authorization, ITC-214-20000803-00478, held by SatCom Global, Inc. (SatCom Global), effective July 2, 2015. SatCom Global is wholly-owned subsidiary of SatCom Distribution, Inc., which in turn is wholly-owned by Broadband Satellite Services Ltd. (BSS), a United Kingdom company. Ian Robinson and Robert Howes, both citizens of the United Kingdom, each held a 50% ownership in BSS. On July 2, 2015, Mr. Robinson and Mr. Howes sold a 17.3% interest in BSS to BGF Investments LP (BGF), a United Kingdom based limited partnership (Business Growth Fund plc (BGF plc), a private equity firm based in England, is the general partner of BGF) and a 2.7% interest to Michael John Butler. As a result of the transaction, the ownership interests of joint owners Ian Robinson and Robert Howes was reduced to 40% each, and they no longer hold negative control of BSS. SatCom Global continues to remain an indirect wholly-owned subsidiary of BSS.

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**ITC-T/C-20160613-00167** E 89Degree Networks LLC

Transfer of Control

Grant of Authority

Date of Action: 07/15/2016

**Current Licensee:** 89Degree Networks LLC

**FROM:** 89Degree Networks LLC

**TO:** 89Degree Networks LLC

Application filed for consent to the transfer of control of international section 214 authorization, ITC-214-20120514-00127, held by 89Degree Networks, LLC (89Degree Networks), from majority member Elaina Mangione (51%), to Robert Crinks. On December 31, 2015, without prior Commission consent, Mr. Crinks, who held a 4% membership interest in 89Degree Networks, acquired an additional 51% interest in 89Degrees from his wife, Ms. Mangione.

Mr. Crinks, a U.S. citizen, now holds a 55% controlling interest in 89Degrees. Valley Technologies Trust (VTT), a Wyoming Trust, holds the remaining 45 percent membership interest in 89Degree Networks. Mohamed Elagazy, a U.S. citizen, is the sole trustee and beneficiary of VTT.

Applicant filed a request for Special Temporary Authority (STA), ITC-STA-20160620-00169, related to this transaction, which was granted on June 30, 2016.

This authorization is without prejudice to the Commission's action in any other related pending proceedings.

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**ITC-T/C-20160623-00174** E i-wireless, LLC

Transfer of Control

Grant of Authority

Date of Action: 07/15/2016

**Current Licensee:** i-wireless, LLC

**FROM:** The Kroger Co.

**TO:** Sprint Corporation

Application filed for consent to the transfer of control of international section 214 authorization, ITC-214-20060724-00363, held by i-wireless, LLC (i-wireless), from joint owners Genie Global Inc. (Genie) and The Kroger Co (Kroger), to Sprint Corporation (Sprint). Pursuant to the terms of a formation agreement dated April 29, 2016, applicants propose to combine their resources in a wireless services partnership to accomplish a modernized Lifeline program. Upon closing, Sprint will acquire 70 percent of the indirect interests in i-wireless, and control of the international service operations of i-wireless. The remaining 30 percent interest in i-wireless will continue to be held in equal shares by Genie and Kroger, through a newly formed holding company.

The following individuals or entities hold 10 percent or greater direct and indirect ownership interests in Sprint: Direct - Starburst I, Inc. (Starburst I), a U.S. entity (77.5 percent equity in Sprint). Indirect - SoftBank Group Corp. (SoftBank Group), a Japanese corporation that holds 100 percent ownership in Starburst I (83.4 percent equity in Sprint); Masayoshi Son, a Japanese citizen holding 23.1 percent ownership in SoftBank Group (19.3 percent indirect equity interest in Sprint).

This authorization is without prejudice to the Commission's action in any other related pending proceedings.

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**INFORMATIVE**

**ITC-214-19990824-00529**

Farmers Telecommunications Corporation

By letter dated June 3, 2016, Applicant notified the Commission that Farmers Telecommunications Corporation will be discontinuing certain voice services in portions of Jackson and Marshall counties in northeastern Alabama on or around August 31, 2016.

**SURRENDER**

**ITC-214-19981023-00745**

MTS COMMUNICATIONS INC.

Applicant notified the Commission of the Surrender of its international section 214 authorization effective May 31, 2016.

## CONDITIONS APPLICABLE TO INTERNATIONAL SECTION 214 AUTHORIZATIONS

- (1) These authorizations are subject to the Exclusion List for International Section 214 Authorizations, which identifies restrictions on providing service to particular countries or using particular facilities. The most recent Exclusion List is at the end of this Public Notice. The list applies to all U.S. international carriers, including those that have previously received global or limited global Section 214 authority, whether by Public Notice or specific written order. Carriers are advised that the attached Exclusion List is subject to amendment at any time pursuant to the procedures set forth in Streamlining the International Section 214 Authorization Process and Tariff Requirements, IB Docket No. 95-118, 11 FCC Rcd 12884 (1996), para. 18. A copy of the current Exclusion List will be maintained in the FCC Reference and Information Center and will be available at <http://transition.fcc.gov/ib/pd/pf/exclusionlist.html>. It also will be attached to each Public Notice that grants international Section 214 authority.
- (2) The export of telecommunications services and related payments to countries that are subject to economic sanctions may be restricted. For information concerning current restrictions, call the Office of Foreign Assets Control, U.S. Department of the Treasury, (202) 622-2520.
- (3) Carriers shall comply with the requirements of Section 63.11 of the Commission's rules, which requires notification by, and in certain circumstances prior notification by, U.S. carriers acquiring an affiliation with foreign carriers. A carrier that acquires an affiliation with a foreign carrier will be subject to possible reclassification as a dominant carrier on an affiliated route pursuant to the provisions of Section 63.10 of the rules.
- (4) A carrier may provide switched services over its authorized resold private lines in the circumstances specified in Section 63.23(d) of the rules, 47 C.F. R. § 63.23(d).
- (5) Carriers shall comply with the "No Special Concessions" rule, Section 63.14, 47 C.F.R. § 63.14.
- (6) Carriers regulated as dominant for the provision of a particular communications service on a particular route for any reason other than a foreign carrier affiliation under Section 63.10 of the rules shall file tariffs pursuant to Section 203 of the Communications Act, as amended, 47 U.S.C. § 203, and Part 61 of the Commission's Rules, 47 C.F.R. Part 61. Carriers shall not otherwise file tariffs except as permitted by Section 61.19 of the rules, 47 C.F.R. § 61.19. Except as specified in Section 20.15 with respect to commercial mobile radio service providers, carriers regulated as non-dominant, as defined in Section 61.3, and providing detariffed international services pursuant to Section 61.19, must comply with all applicable public disclosure and maintenance of information requirements in Sections 42.10 and 42.11.
- (7) Carriers shall file the annual traffic and revenue reports required by Section 43.62(b). See <http://www.fcc.gov/encyclopedia/international-traffic-and-revenue-report>.
- (8) Carriers shall file annual circuit capacity reports required by Section 43.62(a). See <http://www.fcc.gov/encyclopedia/circuit-capacity-report>.
- (9) Carriers should consult Section 63.19 of the rules when contemplating a discontinuance, reduction or impairment of service.
- (10) If any carrier is reselling service obtained pursuant to a contract with another carrier, the services obtained by contract shall be made generally available by the underlying carrier to similarly situated customers at the same terms, conditions and rates. 47 U.S.C. § 203.
- (11) To the extent the applicant is, or is affiliated with, an incumbent independent local exchange carrier, as those terms are defined in Section 64.1902 of the rules, it shall provide the authorized services in compliance with the requirements of Section 64.1903.
- (12) Except as otherwise ordered by the Commission, a carrier authorized here to provide facilities-based service that (i) is classified as dominant under Section 63.10 of the rules for the provision of such service on a particular route and (ii) is affiliated with a carrier that collects settlement payments for terminating U.S. international switched traffic at the foreign end of that route may not provide facilities-based switched service on that route unless the current rates the affiliate charges U.S. international carriers to terminate traffic are at or below the Commission's relevant benchmark adopted in International Settlement Rates, IB Docket No. 96-261, Report and Order, 12 FCC Rcd 19806 (1997). See also Report and Order on Reconsideration and Order Lifting Stay in IB Docket No. 96-261, FCC 99-124 (rel. June 11, 1999). For the purposes of this rule, "affiliated" and "foreign carrier" are defined in Section 63.09.

(13) Carriers shall comply with the Communications Assistance for Law Enforcement Act (CALEA), see 47 C.F.R. §§ 1.20000 et seq.

(14) Every carrier must designate an agent for service in the District of Columbia. See 47 U.S.C. § 413, 47 C.F.R. §§ 1.47(h), 64.1195.

#### Exclusion List for International Section 214 Authorizations

The following is a list of countries and facilities not covered by grant of global Section 214 authority under Section 63.18(e)(1) of the Commission's Rules, 47 C.F.R. § 63.18(e)(1). Carriers desiring to serve countries or use facilities listed as excluded hereon shall file a separate Section 214 application pursuant to Section 63.18(e)(3) of the Commission's Rules. See 47 C.F.R. § 63.22(c).

Countries:

None.

Facilities:

Any non-U.S.-licensed space station that has not received Commission approval to operate in the U.S. market pursuant to the procedures adopted in the Commission's DISCO II Order, IB Docket No. 96-111, Report and Order, FCC 97-399, 12 FCC Rcd 24094, 24107-72 paragraphs 30-182 (1997) (DISCO II Order). Information regarding non-U.S.-licensed space stations approved to operate in the U.S. market pursuant to the Commission's DISCO II procedures is maintained at [http://transition.fcc.gov/bureaus/ib/sd/se/market\\_access.html](http://transition.fcc.gov/bureaus/ib/sd/se/market_access.html).

This list is subject to change by the Commission when the public interest requires. The most current version of the list is maintained at <http://transition.fcc.gov/ib/pd/pf/exclusionlist.html>.

For additional information, contact the International Bureau's Telecommunications and Analysis Division, (202) 418-1480.



**Exhibit C**

**SMS Copy:**

ASWFreeMSG: Important notice about a change to your Lifeline service provider. Click for details: <http://msg4u.us/xxxxx> or call FREE **1-877-631-0858**

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**Content viewed when customer clicks link within SMS:**



To listen to a message please call FREE **1-877-631-0858** from this phone.

**Change in Service Provider Notification**

Sprint and its Virgin Mobile subsidiary have entered into a partnership to merge the Lifeline operations of Assurance Wireless and Access Wireless, a major provider of wireless services to Lifeline customers in 39 states and the District of Columbia.

Beginning on or after October 3, 2016, and once regulatory approval is obtained, your Assurance Wireless Lifeline phone service will be provided by Access Wireless using the Sprint Nationwide Network. No action on your part is required to continue receiving Lifeline service.

You will continue to use your same phone and have the same telephone number.

Access Wireless will provide you with as many or more free minutes and texts as you currently receive. No fees will be applied in connection with the transfer of your service to Access Wireless. You will continue to receive basic Lifeline services that meet or exceed the services currently provided to you. Access Wireless will provide notice of any future changes to rates or terms and conditions of service, as required by law.

More information will be provided to you soon. Access Wireless looks forward to serving you.

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## **IVR Script: Change in Service Provider Notification**

Hello. Please listen to this important message.

Thank you for being an Assurance Wireless customer. This message is to let you know that Assurance Wireless will soon be part of Access Wireless, another major provider of Lifeline services.

Beginning on or after October 3, 2016, Access Wireless will provide your wireless Lifeline phone service. Just like Assurance Wireless, Access uses the Sprint Nationwide Network.

What's important to know is that you do NOT need to take any action. With Access Wireless, you will continue to use your SAME phone with the SAME telephone number. And, you will receive as many or more free minutes, texts and data.

There's no need to call. More information will be provided to you soon so watch your phone for more messages. In the meantime, you can also visit Access Wireless online at [www.accesswireless.com](http://www.accesswireless.com).

Although our name is changing, as Assurance Wireless becomes part of Access Wireless, we look forward to serving you. Thank you and have a great day.

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## **Web Page: Change in Service Provider Notification**

Thank you for being an Assurance Wireless customer. Assurance Wireless will soon be part of Access Wireless, another major provider of Lifeline services.

Beginning on or after October 3, 2016, and once regulatory approval is obtained, Access Wireless will provide your wireless Lifeline phone service. Just like Assurance Wireless, Access uses the Sprint® Nationwide Network.

What's important to know is that you do NOT need to take any action to stay with Access Wireless. You will continue to use your SAME phone with the SAME telephone number. And, you will receive as many or more free minutes, texts and data.

As with Assurance, you will not have a contract with Access Wireless, and have the right to change Lifeline providers.

There's no need to call Assurance Wireless. More information will be provided to you soon so watch your phone for more messages.

Although our name is changing, as Assurance Wireless becomes part of Access Wireless, we look forward to serving you.

**Exhibit D**

**KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

**WASHINGTON HARBOUR, SUITE 400**

**3050 K STREET, NW**

**WASHINGTON, DC 20007**

(202) 342-8400

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AFFILIATE OFFICE  
MUMBAI, INDIA

June 24, 2016

**VIA ECFS**

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

Re: i-wireless, LLC Amended Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On September 9, 2011, i-wireless, LLC (i-wireless or Company) submitted its final proposed Compliance Plan for wireless Lifeline services, outlining the measures it would take to comply with the Commission's Lifeline rules.<sup>1</sup> The Commission approved the Company's Compliance Plan on October 21, 2011.<sup>2</sup>

Enclosed, on behalf of i-wireless, is the Company's Amended Compliance Plan. i-wireless is revising its approved Compliance Plan in order to (i) reflect a transaction, described in more detail in the introduction to the Amended Compliance Plan, whereby Sprint Corporation will acquire 70 percent ownership and control of i-wireless; (ii) confirm the Company's commitment to meeting applicable minimum service standards, including for broadband,

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<sup>1</sup> See 47 C.F.R. §54.400 et seq.

<sup>2</sup> Federal-State Joint Board on Universal Service; Telecommunications Carriers Eligible for Universal Service Support; i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A), Order, DA 11-1763 (Rel. Oct. 21, 2011).

KELLEY DRYE & WARREN LLP

June 24, 2016  
Page Two

pursuant to the Commission's Lifeline Modernization Order<sup>3</sup>; and (iii) update the entirety of the Company's Compliance Plan to reflect current Lifeline rules and requirements.

This letter and amended Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann  
Joshua T. Guyan

*Counsel to i-wireless, LLC*

cc: Ryan Palmer  
Jodie Griffin  
Christian Hoefly  
Nathan Eagan

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<sup>3</sup> See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶¶ 167-216 (rel. Apr. 27, 2016) (Lifeline Modernization Order).

**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	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
i-wireless, LLC	)	

**I-WIRELESS, LLC’S AMENDED COMPLIANCE PLAN**

i-wireless, LLC (i-wireless or the Company), by its attorneys, hereby files its Amended Compliance Plan outlining the measures it takes to implement the conditions imposed by the Federal Communications Commission (Commission) in its Lifeline rules, 47 C.F.R. Part 54, Subpart E, and orders, for purposes of Wireline Competition Bureau (Bureau) approval of the change in ownership and control of this approved Compliance Plan.<sup>1</sup> i-wireless began providing wireless Lifeline service in May, 2011. The Company’s most recently revised Compliance Plan was submitted on September 9, 2011 and approved by the Bureau on October 21, 2011.

On April 29, 2016, i-wireless entered into an agreement with Sprint Corporation (Sprint) and its subsidiary Virgin Mobile USA, LP (Virgin Mobile) whereby 70 percent ownership and control of i-wireless will be acquired by Sprint through its Virgin Mobile subsidiary upon receipt of regulatory approvals. Given that both i-wireless and Virgin Mobile have Lifeline compliance plans that have been approved by the Bureau, i-wireless respectfully requests expeditious approval of this Amended Compliance Plan so that the Company may close the transaction. i-wireless will also

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<sup>1</sup> See *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirement for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 11-42, 09-197, Public Notice, DA 14-1052 (2014).



acquire and provide Lifeline service to the qualified low-income customers currently served by Virgin Mobile and its Assurance Wireless brand pursuant to this Compliance Plan. i-wireless will continue to provide Lifeline services under the brand name “Access Wireless” and intends to provide both mobile voice and broadband Lifeline services that meet the applicable minimum services standards to be reflected in the Commission’s rules.<sup>2</sup>

### **BACKGROUND**

The Commission’s i-wireless Forbearance Order<sup>3</sup> conditionally granted the i-wireless request for forbearance from the section 214(e)(1)(A) requirement that a carrier designated as an eligible telecommunications carrier (ETC) for purposes of federal universal service support provide services, at least in part, over its own facilities, stating “i-wireless may seek ETC designation to offer discounted services to qualified low-income consumers through the universal service Lifeline program.”<sup>4</sup>

The Commission found that a conditional grant of forbearance for i-wireless from the facilities requirement of section 214(e) for the purpose of seeking ETC designation to provide Lifeline support only “will further the statutory goal of providing low-income subscribers access to telecommunications and emergency services, while protecting the universal service fund against waste, fraud and abuse.”<sup>5</sup> The Commission’s grant of forbearance was subject to the following

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<sup>2</sup> See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶¶ 69-113 (rel. Apr. 27, 2016) (Lifeline Modernization Order).

<sup>3</sup> See *Federal-State Joint Board on Universal Service; In the Matter of i-wireless, LLC Petition for Forbearance from 47 U.S.C. § 214(e)(1)(A)*, Order, FCC 10-117, released June 25, 2010 (i-wireless Forbearance Order).

<sup>4</sup> i-wireless Forbearance Order ¶ 1.

<sup>5</sup> *Id.* ¶ 20.

conditions: (a) i-wireless providing its Lifeline customers with 911 and Enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (b) i-wireless providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) i-wireless complying with conditions (a) and (b) as of the date it provides Lifeline service; and (d) i-wireless obtaining a certification from each PSAP where the carrier seeks to provide Lifeline service confirming that the carrier provides its customers with 911 and E911 access or self-certifying that it does so if certain conditions are met; (e) i-wireless requiring each customer to self-certify at the time of service activation and annually thereafter that he or she is the head of household and receives Lifeline-supported service only from i-wireless; (f) i-wireless establishing safeguards to prevent its customers from receiving multiple Lifeline subsidies from i-wireless at the same address; and (g) i-wireless dealing directly with the customer to certify and verify the customer's Lifeline eligibility.<sup>6</sup> The Commission required i-wireless to submit a plan describing the measures it would take to implement each one of these conditions within thirty days of the release of the Order.<sup>7</sup> i-wireless did not seek support for Link-up, as the Commission denied that portion of i-wireless' request for forbearance.<sup>8</sup> Many of these requirements were superseded or incorporated into the rules adopted pursuant to the 2012 Lifeline Reform Order<sup>9</sup> and this Amended Compliance Plan describes i-wireless' compliance with the current Lifeline rules and orders.

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<sup>6</sup> See i-wireless Forbearance Order ¶¶ 11, 16.

<sup>7</sup> See *id.*

<sup>8</sup> See i-wireless Forbearance Order ¶ 1.

<sup>9</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, 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 (Feb. 6, 2012) (2012 Lifeline Reform Order).

## COMPLIANCE PLAN

i-wireless commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers.<sup>10</sup> i-wireless will comply with all conditions set forth in the i-wireless Forbearance Order, the provisions of this Compliance Plan, all laws and regulations governing its provision of Lifeline-supported prepaid wireless service to customers throughout the United States and in addition take the steps set forth herein.

### **I. Access to 911 and E911 Services**

In the i-wireless Forbearance Order, the Commission required i-wireless to provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service, and stated that, in order to demonstrate compliance with the condition, i-wireless must obtain certification from each PSAP where it provides Lifeline service confirming that its customers receive 911 and E911 services. If within 90 days of i-wireless' request, a PSAP had neither provided the certification nor made an affirmative finding that the Company did not provide its customers with 911 and E911 services within the applicable service area, the Order allowed i-wireless to self-certify that it meets the requirements.<sup>11</sup> The Commission and consumers are hereby assured that all i-wireless customers have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 accesses are available from i-wireless handsets, even if the account associated with the handset has no minutes remaining.

i-wireless can assure the Commission that all Lifeline customers have meaningful access to emergency calling services at the time the customer activates Lifeline service, and that such access

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<sup>10</sup> See i-wireless Forbearance Order ¶ 12.

<sup>11</sup> See *id.* ¶ 13.

continues regardless of the customer's account status or the availability of prepaid minutes. The Company's existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying carrier, Sprint, which is acquiring a 70 percent stake in the combined entity. i-wireless also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, the Company transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

To satisfy the conditions of the i-wireless Forbearance Order regarding 911 and E911 services, i-wireless implements the following measures prior to deploying Lifeline services in a given area. Initially, the Company confirms that its underlying carrier has deployed E911 services in a specific PSAP territory. i-wireless obtains the requisite certification from each PSAP where it provides Lifeline service confirming that its customers receive 911 and E911 services. If within 90 days of receiving the Company's request, a PSAP has neither provided such certification nor made an affirmative finding that the Company does not provide its customers with 911 and E911 services within the applicable service area, i-wireless self-certifies that it meets the basic 911 and E911 requirements.

## **II. E911-Compliant Handsets**

The Commission also conditioned its grant of forbearance determination on i-wireless providing only E911-compliant handsets to its Lifeline customers.<sup>12</sup> All i-wireless handsets used in connection with the Lifeline service offering are E911-compliant. In fact, i-wireless' phones have always been and will continue to be 911 and E911-compliant. i-wireless uses phones from Sprint that have been through a stringent certification process in Sprint's handset certification lab, which

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<sup>12</sup> See i-wireless Forbearance Order ¶ 11.

ensures that the handset models used meet all 911 and E911 requirements. Any existing customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Furthermore, in the event that an existing customer does not have an E911-compliant handset, the Company will replace it with a new 911 and 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 and E911-compliant handset as well.

### **III. Certification of Lifeline Customers' Eligibility**

To safeguard against misuse of the Lifeline service plan, the i-wireless Forbearance Order required i-wireless to deal directly with the customer and require each customer to self-certify under penalty of perjury at the time of service activation and annually thereafter that they are the head of household and receive Lifeline-supported service only from i-wireless.<sup>13</sup> These requirements have been supplanted by the rules adopted in the 2012 Lifeline Reform Order setting forth the disclosure and certification requirements for all Lifeline enrollments, with which i-wireless complies.<sup>14</sup> The Commission also required i-wireless to establish safeguards to prohibit more than one supported i-wireless service at each residential address.<sup>15</sup> While i-wireless maintains measures to combat duplicate enrollments, the National Lifeline Accountability Database (NLAD) is in place to detect and guard against intra-carrier and inter-carrier duplicate enrollments.

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<sup>13</sup> See i-wireless Forbearance Order at 16.

<sup>14</sup> See 47 C.F.R. § 54.410(d).

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

**A. Policy**

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

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135 percent of the Federal Poverty Guidelines for a household of that size;<sup>16</sup> or (2) the household's participation in one of the federal assistance programs listed in sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the NLAD, the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

**B. Certification Procedures**

i-wireless has implemented certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting i-wireless in person or via telephone, facsimile, or the internet. At the point of sale, consumers are provided with printed information describing i-wireless' Lifeline program, including eligibility requirements, and with instructions for enrolling. Consumers are signed up in person or directed, via company literature, collateral or advertising, to a toll-free telephone number and to i-wireless' website, which contains a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and eligibility criteria. i-wireless' application form for its Access Wireless service identifies that it is a "Lifeline" application. i-wireless understands and accepts the Commission's requirement that the

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<sup>16</sup> Some states currently set the household income threshold higher. i-wireless will adhere to the standard set in each state until such state differences are eliminated.

Company have direct contact with all customers applying for participation in the Lifeline program.<sup>17</sup> i-wireless will have direct contact with all customers applying for Lifeline service, either in person through its employees or agents or via the telephone (including facsimile) or mail. i-wireless will provide Lifeline-specific training to all personnel, whether employees or agents, who interact with actual or prospective consumers with respect to obtaining, changing or terminating their Lifeline services.

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because “the Commission has consistently found that ‘[I]censees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.’”<sup>18</sup> Because i-wireless is responsible for the actions of all of its employees and agents, including those enrolling customers in any retail locations, and an i-wireless 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.

Consumers who do not complete the application process in person must return the signed application and supporting documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws. Processing of consumers’ applications, including review of all application forms and relevant documentation, will be performed under i-wireless’ supervision by managers

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<sup>17</sup> See i-wireless Forbearance Order ¶ 16.

<sup>18</sup> 2012 Lifeline Reform Order ¶ 110.

experienced in the administration of the Lifeline program.

i-wireless will ensure that all required documentation is taken care of properly by using state-specific compliance checklists. For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify a program in which they participate, and to furnish proof that they currently participate in such program. For applicants demonstrating eligibility for Lifeline based on income, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (e.g., 135% of the Federal Poverty Guidelines) and will be required to provide proof of income-based eligibility. The Company also complies with the requirement to retain and protect proof of eligibility.<sup>19</sup>

Notwithstanding the foregoing with respect to program or income eligibility, for states that require i-wireless to enroll subscribers identified by the state or as eligible in a state database, i-wireless may continue to rely on the state identification or database. In addition, the Lifeline application form will include a certification section where the applicant must attest and sign under penalty of perjury that the applicant's representations are true and correct. Applicants will also be required to certify under penalty of perjury that the applicant's household will receive only one Lifeline service. Penalties for perjury will be clearly-stated on the certification form, as required by the i-wireless Forbearance Order.<sup>20</sup> Copies of the i-wireless application/certification forms are included as **Exhibit A**. Finally, the application forms will collect the following information from the applicant: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box

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<sup>19</sup> See Order on Reconsideration ¶ 221 *supra* n. 3; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

<sup>20</sup> See i-wireless Forbearance Order ¶ 17.



is not sufficient<sup>21</sup>); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>22</sup>

i-wireless will incorporate this information into its customer information database. Prior to initiating service for a customer, the Company will check the address of each Lifeline applicant against its database to determine whether or not it is associated with a customer who already receives i-wireless Lifeline service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with the household.<sup>23</sup> i-wireless will deny the Lifeline application of any such individual and advise the applicant of the basis for the denial. In addition, prior to requesting a subsidy, i-wireless will process and validate i-wireless' subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies ("Double Dip," *i.e.*, any household that is already receiving a Lifeline subsidy from i-wireless will be automatically prevented from receiving a second Lifeline subsidy in that same month); and (2) Inactive Lines Receiving Subsidy (*i.e.*, systems compare all subsidy requests to

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<sup>21</sup> See 2012 Lifeline Reform Order ¶ 87.

<sup>22</sup> See 47 C.F.R. §§ 54.410(d)(2), (f).

<sup>23</sup> i-wireless will utilize the National Lifeline Accountability Database and the Independent Economic Household Worksheet in this process.

underlying network status to ensure that subsidies are requested only for active lines). i-wireless shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent i-wireless customers from engaging in such abuse of the program, inadvertently or intentionally.

### **C. Annual Verification Procedures**

i-wireless annually re-certifies all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and sections 54.410(d) and (f) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.<sup>24</sup> Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.<sup>25</sup>

Verification De-Enrollment. i-wireless de-enrolls subscribers who do not respond to the annual verification or fail to provide the required certification.<sup>26</sup> The Company sends 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 the 30 days, the Company de-enrolls the subscriber within five business days.<sup>27</sup>

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<sup>24</sup> See 2012 Lifeline Reform Order ¶ 120.

<sup>25</sup> See *id.* ¶ 145.

<sup>26</sup> See *id.* ¶ 142; 47 C.F.R. § 54.405(e)(4).

<sup>27</sup> i-wireless also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the recertification requirements in their Lifeline outreach materials. By taking these actions, ETCs and

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

##### **A. Activation and Non-usage Policies**

i-wireless complies with the activation and non-usage policies in sections 54.407 and 54.405(e)(3) of the Commission's rules. After service activation, the Company provides a de-enrollment notice to wireless subscribers who have not used their service for 60 days. After 60 days of non-use, the Company provides notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.<sup>28</sup> If the subscriber does not respond to the notice, the subscriber will be de-enrolled and the Company will not request further Lifeline reimbursement for the subscriber. i-wireless will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.<sup>29</sup>

##### **B. Customer Education with Respect to Duplicates**

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

Database. The Company complies with the requirements of the NLAD and section 54.404 of the Commission's rules. As such, the Company queries the NLAD for every enrollment<sup>30</sup> to determine whether a prospective subscriber is currently receiving a Lifeline

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states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules.” 2012 Lifeline Reform Order ¶ 145.

<sup>28</sup> See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.405(e)(3).

<sup>29</sup> See *id.*

<sup>30</sup> With the limited exception of states that have opted out of the NLAD. In those states, i-

service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.<sup>31</sup>

In addition to checking the NLAD, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline service per household, and the need to ensure that the customer is informed of this restriction.

One-Per-Household Certification. i-wireless has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household<sup>32</sup> through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.<sup>33</sup> If so, and the applicant lives at an address with multiple households, the Company will require the

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wireless queries the state duplicates database.

<sup>31</sup> See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber's information in the NLAD within ten business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

<sup>32</sup> A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. See 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

<sup>33</sup> See 2012 Lifeline Reform Order ¶ 78.

applicant to complete and submit a 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).<sup>34</sup>

In addition, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and facilitate the applicant's understanding of what constitutes "Lifeline-supported services," and the ability to determine whether he or she is already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that documentation is necessary for enrollment; and (7) i-wireless' name (the ETC).<sup>35</sup> These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.<sup>36</sup> This specifically includes the Company's

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<sup>34</sup> *Id.* The USAC Household Worksheet is available at <http://www.lifelinesupport.org/ls/eligibility/default.aspx#household>.

<sup>35</sup> *See* 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

<sup>36</sup> *See id.*

website for its wireless service (<https://www.accesswireless.com/>) as well as outdoor signage.<sup>37</sup>

Samples of the Company's marketing materials are included as **Exhibit B**. In addition, the Company's application/certification forms 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.

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

i-wireless has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Providing state commissions (PUC), the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, i-wireless agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if i-wireless' investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that i-wireless' Lifeline service should be discontinued such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and Order (Section III, B.).

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<sup>37</sup> *See id.*

## **V. Included Usage**

i-wireless currently offers Lifeline subscribers 250 anytime voice minutes, unlimited text messaging and a wireless handset at no cost to the consumer. However, current customers will be upgraded to 350 anytime voice minutes and unlimited texts after closing of the transaction with Sprint. Further, i-wireless intends to provide both mobile voice and broadband Lifeline services that meet the applicable minimum services standards in the Commission's rules, including providing Wi-Fi-capable and hotspot-capable devices consistent with the requirements of the Lifeline Modernization Order.<sup>38</sup>

## **VI. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation**

Section 54.202(a)(4) of the Commission's rules, 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.<sup>39</sup> The Compliance Plan Public Notice requires that a carrier's compliance plan include this demonstration.<sup>40</sup> i-wireless has been offering non-Lifeline wireless service since September, 2006 and Lifeline wireless service since May, 2011. The Company continues to generate revenues from non-Lifeline services and its owner upon closing of the transaction will be one of the nation's major facilities-based wireless carriers. Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state.

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<sup>38</sup> See Lifeline Modernization Order ¶¶ 69-113, 367-78.

<sup>39</sup> See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

<sup>40</sup> See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

## CONCLUSION

i-wireless submits that its Compliance Plan, as amended, fully satisfies the conditions set forth in the Commission's 2012 Lifeline Reform Order, the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this Compliance Plan is essential to allow i-wireless and Sprint to close the transaction described herein and i-wireless to continue to provide important communications services to qualified low-income subscribers, which will include broadband service as contemplated by the Commission's Lifeline Modernization Order.

Respectfully submitted,



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John J. Heitmann  
Joshua T. Guyan  
Kelley Drye & Warren LLP  
3050 K Street, NW  
Suite 400  
Washington, D.C. 20007  
(202) 342-8544

*Its Counsel*

Dated June 24, 2016



**Exhibit A**

Sample Lifeline Application/Certification Forms  
(North Carolina)

## APPLICANT INFORMATION

First Name: \_\_\_\_\_ MI: \_\_\_\_\_ Last Name: \_\_\_\_\_

Residential Address: \_\_\_\_\_ Apt/Floor/Other \_\_\_\_\_  
(NO P.O. BOXES, MUST BE YOUR PRINCIPAL ADDRESS)

This address is:  Permanent  Temporary  Multi-Household

Mailing Address: \_\_\_\_\_ Apt/Floor/Other \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_

Contact Telephone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Last Four Digits of Social Security Number (or full Tribal ID Number): XXX-XX- \_\_\_\_\_

I am a Tribal Resident:  Yes  No

### QUALIFYING INCOME ELIGIBILITY INFORMATION

You are eligible to apply if your household income is at or below 135% of the Federal Poverty Guidelines (FPG). You must submit proof of total household income for income-based qualification. Proof can include last year's income tax return, Social Security, retirement/pension, Unemployment/Workers' Compensation statement of benefits, divorce decree, child support award, three months' consecutive pay stubs, letter from employer verifying income, or other official documents containing income information. Please do not provide original documents – copies ONLY.

# of Household Members	Annual Income	Check Box that Applies
1	\$16,038	<input type="checkbox"/>
2	\$21,627	<input type="checkbox"/>
3	\$27,216	<input type="checkbox"/>
4	\$32,805	<input type="checkbox"/>
5	\$38,394	<input type="checkbox"/>
6	\$43,983	<input type="checkbox"/>
7	\$49,586	<input type="checkbox"/>
8	\$55,202	<input type="checkbox"/>

*For each additional household member above 8, add \$5,616.*

### Important Information About the Lifeline Program

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless, LLC, d/b/a Access Wireless, which is an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount may be received per household. A household is defined, for the 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 benefits from multiple providers. Violation of the one-per-household rule constitutes a violation of the FCC's rules and will result in the customer's de-enrollment from Lifeline and potentially prosecution from the United States government. Only eligible customers may enroll in the program. 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. Customers must present proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records and any discrepancies could result in delays in your approval or rejection of service.

### Activation & Usage Requirements

This service is a prepaid service and you must activate it by dialing 611 from your Access Wireless 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 Access Wireless, answering an inbound call from someone other than Access Wireless, or by responding to a direct contact from Access Wireless confirming that you want to continue receiving Lifeline service from them. 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 Access Wireless Customer Care center) subject to a 30-day cure period during which you may use the service (as described above) or contact Access Wireless to confirm that you want to continue receiving your Lifeline service from them.

I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements and important information on the Lifeline program.

**I hereby certify, under penalty of perjury, that:** (INITIAL BY EACH LINE)

- \_\_\_\_\_ (1) I meet the program-based eligibility criteria for receiving Lifeline service with an annual household income at or below 135% FPG, and have provided documentation of eligibility if required.
- \_\_\_\_\_ (2) I will notify Access Wireless 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.
- \_\_\_\_\_ (3) I am not listed as a dependent on another person's tax return (unless over the age of 60).
- \_\_\_\_\_ (4) I attest, to the best of my knowledge, that no one in my household, including myself, is receiving a Lifeline-supported service from any other landline or wireless company such as Bellsouth Telecommunications Inc., Safelink Wireless, or Assurance Wireless.
- \_\_\_\_\_ (5) The residential address listed above is my primary residence, not a second home or business.
- \_\_\_\_\_ (6) If I move to a new address, I will provide that new address to Access Wireless within 30 days.
- \_\_\_\_\_ (7) If I provided a temporary residential address to Access Wireless, I will verify my temporary residential address as required by law.
- \_\_\_\_\_ (8) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- \_\_\_\_\_ (9) 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.
- \_\_\_\_\_ (10) The information included in this certification form is true and correct to the best of my knowledge.
- \_\_\_\_\_ (11) If Access Wireless finds that I am already receiving a Lifeline discount benefit from another provider, I agree that I want to transfer my Lifeline discount benefit from that Lifeline provider to Access Wireless. I understand that once the transfer is complete, I will lose my Lifeline Program benefit with any other Lifeline provider from which I am currently receiving a Lifeline discount. Access Wireless has explained to me and I understand that I may not have multiple Lifeline Program benefits with the same or different providers.
- \_\_\_\_\_ (12) I certify that the individual named on the documentation used to demonstrate program participation or income eligibility is part of my household.
- \_\_\_\_\_ (13) *If Applicable:* I reside on Federally recognized Tribal Lands.

**AUTHORIZATION & CERTIFICATIONS** (INITIAL BY EACH LINE)

- \_\_\_\_\_ (1) I hereby authorize Access Wireless to access any records to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize Access Wireless to release any records required for the administration of the Lifeline program, including name, telephone number, address, date of birth, Social Security Number as required by state, amount of support being sought, means of qualification for support, and dates of service initiation and termination 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.
- \_\_\_\_\_ (2) I understand that I have the right to enroll in the Lifeline service using non-electronic methods. I further understand that I have the right to withdraw this consent at any time prior to activation of my service. Access Wireless has advised me that I may request a paper copy of my contract and associated fees by calling 611 from my mobile handset.
- \_\_\_\_\_ (3) I hereby authorize Access Wireless to send text messages to my Access Wireless phone number about my Lifeline benefit. Text messages sent by Access Wireless will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than Access Wireless.

**Mail application to:**  
Access Wireless  
One Levee Way, Suite 3106  
Newport, KY 41071

**For faster processing fax to:**  
1-888-594-4473

**You can also apply online at:**  
[www.accesswireless.com](http://www.accesswireless.com)

APPLICANT'S SIGNATURE *Please use blue or black ink*

DATE

This signed authorization is required in order to enroll you in the Lifeline Program in your state and is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Access Wireless.

**If you have any questions  
CALL 1-888-450-1838**

  
**access WIRELESS**<sup>®</sup>  
A government-funded Lifeline Assistance Program.

## NORTH CAROLINA APPLICANT INFORMATION

First Name: \_\_\_\_\_ MI: \_\_\_\_\_ Last Name: \_\_\_\_\_

Residential Address: \_\_\_\_\_ Apt/Floor/Other \_\_\_\_\_  
(NO P.O. BOXES, MUST BE YOUR PRINCIPAL ADDRESS)

This address is:  Permanent  Temporary  Multi-Household

Mailing Address: \_\_\_\_\_ Apt/Floor/Other \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_

Contact Telephone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Last 4-digits of Social Security Number (or full Tribal ID Number): XXX-XX-\_\_\_\_\_

I am a Tribal Resident:  Yes  No

### QUALIFYING PROGRAM INFORMATION

**Applicant must provide** documented proof of participation in the program indicated below or proof of income.

- Bureau of Indian Affairs General Assistance
- Federal Public Housing Assistance (FPHA)/Section 8
- Food Distribution Program on Indian Reservations
- Headstart (meeting income qualifying standards)
- Low Income Heat and Energy Assistance Program (LIHEAP)
- Tribally Administered Temporary Assistance for Needy Families (TANF)
- Supplemental Nutrition Assistance Program (SNAP)/Food Stamps/  
Food Assistance/Food and Nutrition Services
- National School Lunch Program's Free Lunch Program (NSLP)
- Supplemental Security Income (SSI)
- Work First/Temporary Assistance to Needy Families (TANF)
- Carolina Access/Medicaid

### Important Information About the Lifeline Program

Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline service is provided by i-wireless, LLC, d/b/a Access Wireless, which is an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount may be received per household. A household is defined, for the 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 benefits from multiple providers. Violation of the one-per-household rule constitutes a violation of the FCC's rules and will result in the customer's de-enrollment from Lifeline and potentially prosecution from the United States government. Only eligible customers may enroll in the program. 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. Customers must present proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records and any discrepancies could result in delays in your approval or rejection of service.

### Activation & Usage Requirements

This service is a prepaid service and you must activate it by dialing 611 from your Access Wireless 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 Access Wireless, answering an inbound call from someone other than Access Wireless, or by responding to a direct contact from Access Wireless confirming that you want to continue receiving Lifeline service from them. 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 Access Wireless Customer Care center) subject to a 30-day cure period during which you may use the service (as described above) or contact Access Wireless to confirm that you want to continue receiving your Lifeline service from them.

- I hereby certify that I have read and understood the disclosures listed above regarding activation and usage requirements and important information on the Lifeline program.**

**I hereby certify, under penalty of perjury, that:** (INITIAL BY EACH LINE)

- \_\_\_\_\_ (1) I meet the program-based eligibility criteria for receiving Lifeline service with an annual household income at or below 135% FPG, and have provided documentation of eligibility if required.
- \_\_\_\_\_ (2) I will notify Access Wireless 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.
- \_\_\_\_\_ (3) I am not listed as a dependent on another person's tax return (unless over the age of 60).
- \_\_\_\_\_ (4) I attest, to the best of my knowledge, that no one in my household, including myself, is receiving a Lifeline-supported service from any other landline or wireless company such as Century Link, Safelink Wireless, or Assurance Wireless.
- \_\_\_\_\_ (5) The residential address listed above is my primary residence, not a second home or business.
- \_\_\_\_\_ (6) If I move to a new address, I will provide that new address to Access Wireless within 30 days.
- \_\_\_\_\_ (7) If I provided a temporary residential address to Access Wireless, I will verify my temporary residential address as required by law.
- \_\_\_\_\_ (8) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- \_\_\_\_\_ (9) 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.
- \_\_\_\_\_ (10) The information included in this certification form is true and correct to the best of my knowledge.
- \_\_\_\_\_ (11) If Access Wireless finds that I am already receiving a Lifeline discount benefit from another provider, I agree that I want to transfer my Lifeline discount benefit from that Lifeline provider to Access Wireless. I understand that once the transfer is complete, I will lose my Lifeline Program benefit with any other Lifeline provider from which I am currently receiving a Lifeline discount. Access Wireless has explained to me and I understand that I may not have multiple Lifeline Program benefits with the same or different providers.
- \_\_\_\_\_ (12) I certify that the individual named on the documentation used to demonstrate program participation or income eligibility is part of my household.
- \_\_\_\_\_ (13) *If Applicable:* I reside on Federally recognized Tribal Lands.

**AUTHORIZATION & CERTIFICATIONS** (INITIAL BY EACH LINE)

- \_\_\_\_\_ (1) I hereby authorize Access Wireless to access any records to verify my statements on this form and to confirm my eligibility for the Lifeline program. I also authorize Access Wireless to release any records required for the administration of the Lifeline program, including name, telephone number, address, date of birth, Social Security Number as required by state, amount of support being sought, means of qualification for support, and dates of service initiation and termination 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.
- \_\_\_\_\_ (2) I understand that I have the right to enroll in the Lifeline service using non-electronic methods. I further understand that I have the right to withdraw this consent at any time prior to activation of my service. Access Wireless has advised me that I may request a paper copy of my contract and associated fees by calling 611 from my mobile handset.
- \_\_\_\_\_ (3) I hereby authorize Access Wireless to send text messages to my Access Wireless phone number about my Lifeline benefit. Text messages sent by Access Wireless will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than Access Wireless.

**Mail application to:**

Access Wireless  
One Levee Way, Suite 3106  
Newport, KY 41071

**For faster processing fax to:**

1-888-594-4473

**You can also apply online at:**

[www.accesswireless.com](http://www.accesswireless.com)

\_\_\_\_\_  
APPLICANT'S SIGNATURE *Please use blue or black ink*

\_\_\_\_\_  
DATE

This signed authorization is required in order to enroll you in the Lifeline Program in your state and is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by Access Wireless.

**If you have any questions  
CALL 1-888-450-1838**

  
**access WIRELESS**<sup>®</sup>  
A government-funded Lifeline Assistance Program.

**Exhibit B**

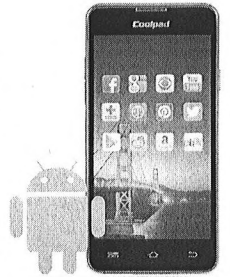
Sample Marketing Materials

# Free Phone + 250 Minutes & Unlimited Text every month!

North Carolina residents who participate in SNAP, Carolina Access/Medicaid, LIHEAP, NSLP, Federal Public Housing Assistance/Section 8, Supplemental Security Income, Work First/TANF, Tribal TANF, Bureau of Indian Affairs General Assistance, Food Distribution on Indian Reservations, and Headstart may **PRE-QUALIFY!**

To apply, visit [www.enroll.accesswireless.com](http://www.enroll.accesswireless.com)

access **WIRELESS.**  
A government-funded LifeLine Assistance Program.



\*Free phone is provided by Access Wireless. Phone models based on inventory availability. Access Wireless is a service provider for the government-funded Lifeline Assistance Program. Lifeline Assistance is provided by I-wireless LLC, d/b/a Access Wireless, an eligible telecommunications carrier. Lifeline service is non-transferable. Only one Lifeline discount, whether wireline or wireless, may be received per household. A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household rule constitutes a violation of the FCC rules and will result in the customer's de-enrollment from Lifeline. Only eligible consumers may enroll in the program. 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. Customers must demonstrate proper documentation confirming eligibility for the Lifeline program. Your information will be validated against public records and any discrepancies could result in delays in your approval or rejection of service.



# FREE Lifeline Service

## Available for Income-Eligible Residents

If you participate in public assistance programs or meet monthly income level guidelines, you may qualify for a free phone\* + 250 Minutes & Unlimited Texts.

**To apply visit [www.enroll.accesswireless.com](http://www.enroll.accesswireless.com)**

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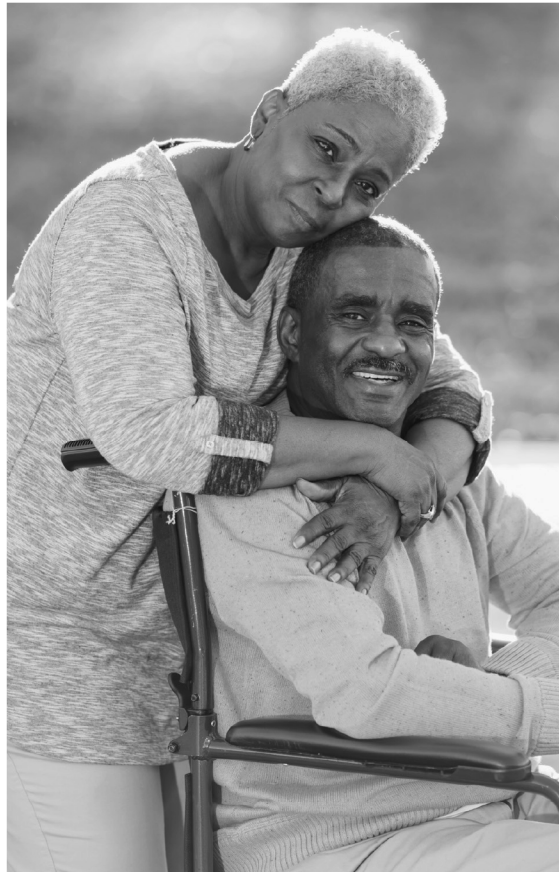
A government-funded Lifeline Assistance Program.



# What's Included?



Upon approval of your application for Lifeline service, you'll receive a free mobile phone provided by Access Wireless. On the same date each month, a free allotment of 250 minutes and unlimited text messaging will automatically be applied to your Access Wireless account.



# Need More Airtime?

**It's easy to add money to your account.** Purchase an Access Wireless or i-wireless airtime card at Kroger-owned stores or redeem a PIN at convenience stores nationwide. You can also use a debit or credit card to add airtime.

		<b>\$10</b>	<b>250 Minutes Unlimited Text Messaging 250 MB Data</b>
		<b>\$25</b>	<b>500 Minutes Unlimited Text Messaging 750 MB Data</b>
		<b>\$35</b>	<b>Unlimited Talk for 30 days Unlimited Text Messaging 1 GB Data</b>
		<b>\$50</b>	<b>Unlimited Talk for 30 days Unlimited Text Messaging 2 GB Data</b>
		<b>\$5</b>	<b>100 Minutes 100 MB Data</b> <i>Electronic PIN; at select locations</i>

Unlimited does not mean unreasonable. Monthly Lifeline credit of 250 voice minutes and unlimited text messaging is applied on the same date each month. Unused minutes, texts, data or picture messages will automatically carry forward to the next month when a user adds a minimum of \$10 to their account within the previous 60 days or has earned a FREE Wireless Reward in the prior 45 days. If no additional funds beyond the free monthly Lifeline credit are applied to the account within 60 days or FREE Wireless Rewards have not been earned in the prior 45 days, any unused minutes, texts, data or picture mail will automatically be removed from the account balance. Expiration dates for any funds added to an Access Wireless account will adhere to the standard business rules associated with card/PIN denomination. Access Wireless users must be registered for the FREE Wireless Rewards program in order to be eligible to receive FREE Wireless Rewards. Rewards will be applied in 20-minute increments for every 100 points earned in-store on qualifying purchases. Some restrictions apply.

\*\* FREE Wireless Rewards are earned on qualifying purchases only. SNAP/Food Stamp purchases may be eligible for loyalty rewards program. Access Wireless users must be registered for the FREE Wireless Rewards program in order to receive rewards. Some restrictions apply. For details on the FREE Wireless Rewards program, visit [www.accesswireless.com/rewards](http://www.accesswireless.com/rewards).

# Earn FREE Wireless Rewards.



You can earn FREE Wireless Rewards in the checkout line when you shop at participating Kroger-owned stores and use your Shopper's or Rewards Card. For every 100 points you earn, you'll receive a FREE Wireless Reward.\*\*



Call 611 from your Access Wireless phone to register.

# Manage Your Account 24/7.

View your account details using the **My Account** feature online at [www.accesswireless.com](http://www.accesswireless.com) or dial 611 directly from your Access Wireless phone. You can check your balance, add airtime, upgrade your phone or view your account activity any time day or night.



# What is Access Wireless?

Access Wireless provides mobile phone service to income-eligible residents as part of the government-funded Lifeline Assistance Program.

## How do I qualify?

You may automatically qualify for Access Wireless service if you participate in one of these public assistance programs:

- **SNAP/Food Stamps**
- **Carolina Access/Medicaid**
- **Federal Public Housing Assistance/Section 8**
- **Low Income Home Energy Assistance Program**
- **National School Lunch Program's Free School Lunch**
- **Supplemental Security Income\***
- **Work First/Temporary Assistance for Needy Families**
- **Bureau of Indian Affairs General Assistance**
- **Food Distribution on Indian Reservations**
- **Headstart (meeting income-qualifying standards)**
- **Tribally Administered Temporary Assistance for Needy Families**

You may also qualify for Access Wireless service based on your household income.

\* Not the same as Social Security benefits.

# Important Account Information

- **You must use your Lifeline phone to make a phone call at least one time per month to keep your service active.**
- **You must annually verify your eligibility for Lifeline Assistance by completing the recertification process.**
- **Lifeline Assistance is limited to one benefit per household consisting of either wireline or wireless service, but not both.**

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Free phone provided by Access Wireless. Phones may vary by handset manufacturer and model and are dependent on inventory availability. Pricing listed includes domestic calling only. Access Wireless is not available in all areas. For coverage availability, visit [www.accesswireless.com](http://www.accesswireless.com).

Access Wireless network services are provided on the Nationwide Sprint Network. Although Sprint provides Access Wireless subscribers usage of its network, and to its wireless services, Access Wireless is responsible for their service. For questions about Access Wireless service, visit [www.accesswireless.com/support](http://www.accesswireless.com/support).

Sprint is a trademark of Sprint Nextel.



Free  
Smartphone  
+ 250 Minutes &  
Unlimited Text  
every month

To determine if you qualify, visit  
[www.accesswireless.com](http://www.accesswireless.com)



You may qualify for Lifeline Assistance provided by Access Wireless\* if you participate in public assistance programs such as SNAP/Food Stamps, Medicaid or Supplemental Security Income.

To apply, visit [www.accesswireless.com](http://www.accesswireless.com)

  
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