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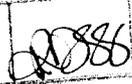
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January 7, 2011

VIA OVERNIGHT DELIVERY

Lori Morrison, Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007
(602) 542-0664

Arizona Corporation Commission
DOCKETED
JAN 10 2011

DOCKETED BY 

Re: i-wireless, LLC
Docket No.T-20538A-10-0332

Dear Ms. Morrison:

Enclosed please find for filing an original and thirteen (13) copies of i-wireless, LLC's responses to Staff's First Set of Data Requests in the above referenced matter. Responses have also been sent to you via email at lmorrison@azcc.gov.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

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

Respectfully submitted,

Lance J.M. Steinhart
Attorney for i-wireless, LLC

cc: Patrick McDonough
Kimberly A. Ruht, Legal Division
via e-mail: kruht@azcc.gov

Attached Service List

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AZ CORP COMMISSION
DOCKET CONTROL

SERVICE LIST FOR: I-WIRELESS, LLC
DOCKET NO.: T-20538A-10-0332

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
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LM 1.1: Please identify by wire center and serving incumbent local telephone company ("ILEC"), the authorized service area that i-wireless' service covers. In addition, please identify each serving ILEC as either rural or non-rural.

RESPONSE: i-wireless' service area covers the authorized service areas of the Arizona ILECs listed in Exhibit 1, attached hereto, which replaces Exhibit 5 of i-wireless' Petition. i-wireless is still gathering information to identify its service area by wire center, and will submit more detailed geographic information to the Commission at a later date.

All Contacts Providing Information/Response for the above question:

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LM 1.2: Provide a map showing the coverage area of the carrier that i-wireless is reselling.

RESPONSE: Due to the limitations of licensing agreements, i-wireless' underlying carrier is unable to provide its more detailed maps. However, i-wireless has attached as Exhibit 2 general coverage area maps that are available.

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LM 1.3: Please provide an overlay of the map requested in LM 1.2 with each of the ILEC service areas.

RESPONSE: See attached Exhibit 3. i-wireless has created an overlay that approximates its coverage area with respect to the State of Arizona Telephone With Lata map, which consolidates the ILEC service area boundaries, and has also provided a map indicating tribal areas.

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LM 1.4: On page 1 of its Petition, i-wireless indicates it is seeking designation as an ETC in Arizona. Exhibit 5 of i-wireless' Petition contains a list of ILECs authorized to provide service in Arizona.

- a. Does i-wireless intend to provide Lifeline service to all qualified households located within the State of Arizona? If not, please explain in detail why not.

RESPONSE: Yes, to the extent that its underlying carrier has coverage.

- b. I-wireless' list of ILECs is incomplete. Specifically, none of the Tribal owned ILECs located in the State of Arizona are listed. Please provide an updated and corrected list of all ILECs in the State of Arizona whose service territory i-wireless seeks to be designated as an ETC.

RESPONSE: Please see attached Exhibit 1.

- c. Will i-wireless be providing Lifeline services on Native American Land to qualified households? If not, please explain in detail why not? If so, why were the tribal owned ILECs excluded from Exhibit 5?

RESPONSE: Yes. i-wireless excluded tribal owned ILECs from its Petition because the Company did not initially intend to target tribal customers.

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LM 1.4 (Cont'd):

- d. On August 25, 2010, in WC Docket No. 09-197, i-wireless petitioned the FCC for designation as an ETC in the States of Alabama; Connecticut; Delaware; New Hampshire; North Carolina; New York; Tennessee; the Commonwealth of Virginia; and the District of Columbia. On page 9 of the FCC petition, Section IV, i-wireless specifies that its proposed service area excludes any Tribal Areas.
1. Please explain in detail why i-wireless limited its ETC designation to exclude Tribal Areas in its WC Docket No. 09-197 Petition.
 2. Since i-wireless has not explicitly stated in its Arizona petition (ACC Docket No. T-20538A-10-0332) that its proposed service area in Arizona excludes Tribal Areas, is it correct to conclude that i-wireless intends to include Tribal Areas in this petition? If the above conclusion is not correct, please explain in detail why i-wireless would exclude Tribal Areas from its service area in Arizona.

RESPONSE: i-wireless limited its FCC ETC designation request to exclude tribal areas because the Company's initial business plan did not include a separate offering for tribal customers. i-wireless has since decided to expand its Lifeline offering to encompass Tribal Areas in certain states, including Arizona.

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LM 1.5: With respect to i-wireless' response to LM 1.4(b), please update Exhibit 5 to include the SAC ("Study Area Code") for each referenced ILEC (Incumbent Local Exchange Carrier).

RESPONSE: Please see attached Exhibit 1.

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LM 1.6: For each SAC for which i-wireless seeks ETC status, please provide the following in tabular form:

- a. SAC number;
- b. Lifeline support dollars per handset per month;
- c. Number of minutes of free minutes service per month; and
- d. Any other universal service funds not included above (on a per handset/per month basis).

RESPONSE: Please see attached Exhibit 1. i-wireless will only provide Lifeline support; no other universal service funds are included.

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LM 1.7: Are there areas of Arizona where i-wireless' underlying carrier(s) does not have facilities and rely upon roaming agreements with other carriers in order to provide service? If yes, do i-wireless' agreements with its carrier(s) allow i-wireless to resell service where service can only be provided via a roaming agreement?

RESPONSE: i-wireless' carrier agreement(s) does not rely on roaming. i-wireless provides exceptional nationwide digital coverage on the Nationwide Sprint PCS Network.

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LM 1.8: Please describe in detail i-wireless' commitment and ability to provide the supported services throughout the designated service area.

RESPONSE: In its Petition, i-wireless details its ability to offer, upon designation as an ETC in Arizona, all of the services and functionalities required by Section 54.101(a)(1)-(9) and Section 54.202(a) of the FCC's Rules (47 C.F.R. §§ 54.101(a) and 47 C.F.R. § 54.202(a)). As a reseller, i-wireless' service is of the same quality and reliability as that of its underlying carrier(s).

i-wireless is committed to Arizona residents. i-wireless foresees that the implementation of its Lifeline program will create the need for more i-wireless employees in Arizona. i-wireless currently employs one Arizona resident as a field sales representative who travels to work with store locations throughout the state. i-wireless intends to expand its number of Arizona sales representatives once its Lifeline program is underway, and believes that Kroger may need to hire more Arizona residents as well.

i-wireless has partnered with companies that have long standing commitments to Arizona residents, such as Sprint and Kroger. Kroger has 118 stores in the state of Arizona, through which i-wireless distributes and advertises its product. This footprint of stores will give i-wireless a broader reach than typical Lifeline providers. Typical Lifeline providers advertise and focus their efforts on major metropolitan areas such as Pheonix. i-wireless, however, will reach customers through its presence in small cities and towns such as Buckeye, Casa Grande, Fountain Hills and Sierra Vista, Arizona.

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LM 1.9: Provide the date when i-wireless started providing service in Arizona.

RESPONSE: i-wireless activated its first Arizona customer in February of 2007.

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LM 1.10: If i-wireless provides service to qualified households on tribal lands and intends to offer free service, please explain in detail how i-wireless intends to comply with FCC requirement that a discount cannot bring the subscriber's cost for basic local service to less than \$1.

RESPONSE: Please see attached Exhibit 4 for a description of i-wireless' tribal Lifeline offering. i-wireless commits that its tribal offering will not bring the subscriber's cost to less than \$1.00. The Company is still exploring the most efficient and effective method to use in collecting the monthly fee for service.

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LM 1.11: If i-wireless provides service to qualified households on tribal lands, please explain in detail any differences in price/features/usage between on-reservation and off-reservation plans and why there is a difference.

RESPONSE: The tribal offering is required to involve a cost to the customer of at least \$1.00, and will involve a greater subsidy amount passed along to the customer, since i-wireless will have access to Tier IV reimbursement from the federal universal service fund for on-reservation customers.

Tribal customers will receive access to all of the same features as non-tribal customers. Instead of receiving 150 minutes for free per month (equal to \$15 in subsidy), tribal customers will receive unlimited voice minutes for just \$1 per month (equal to \$39 in subsidy).

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LM 1.12: Referencing pages 12-13 of the Petition and i-wireless' advertising of its Lifeline program, will there be advertisements in any Native American dialects? If so, please list the dialects to be used.

RESPONSE: Not at this time.

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LM 1.13: What differentiates i-wireless' Lifeline offering from that of other wireless ETCs?

RESPONSE: i-wireless offers a unique benefit through its affiliation with The Kroger Co., the nation's largest grocery retail chain and second largest retailer overall, which allows customers to earn Free Minutes simply by shopping at select Kroger-owned store locations using their Kroger loyalty card. Because i-wireless and Kroger are committed to lower-income individuals, customers can participate in the Free Minutes program even when using food stamps for payment.

Many i-wireless customers are from lower-income backgrounds and did not previously have access to high quality wireless services because of financial constraints or poor credit history. Unlike many traditional wireless ETCs, i-wireless does not impose burdensome credit checks, long-term service contracts, activation fees or roaming charges. i-wireless customers are able to choose a prepaid plan in which they are charged only for the minutes they use, and i-wireless will offer Lifeline customers a certain amount of voice usage free of charge. Unlike some wireless ETCs, including its prepaid wireless competitors, i-wireless does not charge for incoming text messages, balance inquiries, or calls to i-wireless customer service, and unused minutes carry over from one month to the next.

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LM 1.14: What differentiates i-wireless' Lifeline offering from that of landline based ETCs?

RESPONSE: In general, there are major differences between wireline ILEC services and wireless services provided by i-wireless and other CMRS providers. On the one hand, ILECs typically provide a basic package of unlimited local calling with no calling features, such as Caller ID, call waiting and voice mail. Toll or long distance calls (both intrastate and interstate), and calling features, are subject to additional charges. On the other hand, i-wireless provides a basic package of a flat rate for a fixed number of minutes of air time, which can be used to make local calls and long distance calls, and to send texts, with no geographic limitation, other than the coverage area of underlying carrier's network.

Furthermore, i-wireless does not impose burdensome credit checks, long-term service contracts or activation fees. i-wireless customers are able to choose a prepaid plan in which they are charged only for the minutes they use, and i-wireless will offer Lifeline customers a certain amount of voice usage free of charge. In addition to voice services, i-wireless will provide Lifeline customers with access to a variety of other features at no cost, including voice mail, caller I.D., call waiting services and E911 capabilities. i-wireless will also provide its customers with free handsets that are 911 capable. Finally, i-wireless offers the unique benefit of the Free Minutes program mentioned in LM 1.13 above.

While the unlimited calling plan of the ILEC certainly will appeal to some consumers, the ability to make local and long distance calls, and the ability to send texts for a flat rate, will be more appealing to some consumers. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

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LM 1.15: For service areas where i-wireless is seeking ETC designation, and another wireless carrier is currently designated as an ETC, please explain in detail why the public interest would be served by having multiple wireless carriers designated as an ETC.

RESPONSE: Introducing i-wireless as an additional wireless ETC provider into the market will afford low income Arizona residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN. As noted in i-wireless' ETC Application, only between 20-50% of Lifeline-eligible consumers in Arizona were being provided such services as of December 31, 2008. As of December 31, 2009, the Lifeline participation rate in Arizona fell to between 10-20% (*see <http://www.usac.org/li/about/participation-rate-information.aspx#2009>*).

i-wireless believes that it is uniquely positioned to help increase awareness of and participation in the Lifeline program.

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LM 1.16: How do the prices for i-wireless' current voice service offerings compare with the prices of wireline offerings for the ILEC(s) and other competitive ETCs in whose service area i-wireless is requesting ETC designation?

RESPONSE: Per Qwest's Exchange and Network Services Price Cap tariff, a Lifeline customer can access flat rate basic residential service for \$13.18 per month plus taxes and fees. An i-wireless Lifeline customer can access unlimited nationwide calling, unlimited texting and unlimited data for \$25.00 per month plus taxes and fees, with voicemail, caller ID and call waiting included at no extra charge.

i-wireless' Lifeline offering compares favorably with other competitive ETCs. For example, i-wireless' offer of 150 free minutes is competitive with Tracfone's proposed Safelink service of 125 or 250 minutes, given i-wireless does not charge customers for customer care calls or incoming text messages and allows minutes to rollover. Customers are offered the flexibility of taking a dollar credit of \$15, in lieu of the minutes, and applying it towards any retail plan (except a text only plan). With this credit customers can put \$10 (approximately \$11.15 with tax) on their account and receive 200 minutes, unlimited texting and unlimited data. Alternatively they can put \$25 (approximately \$27.88 with tax) towards their account and receive unlimited nationwide calling, unlimited texting and unlimited data.

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LM 1.17: How does the local calling area of i-wireless' current voice service offerings compare with the local calling area of the landline offerings for the ILEC(s) and other competitive ETCs in whose service area i-wireless is requesting ETC designation?

RESPONSE: As mentioned in LM 1.14, i-wireless, as a provider of wireless telecommunications services, does not impose a local calling area restriction like landline carriers. Domestic "long distance" calls are treated the same as "local" calls, thus the local calling area of i-wireless is exponentially greater than that of a landline carrier.

As a wireless reseller, i-wireless offers service wherever its underlying carrier, Sprint, has coverage.

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LM 1.18: Does i-wireless anticipate that it will offer a “basic local exchange service” in addition to its current service offerings should ETC status be granted? If yes, please describe. If no, please explain why not. (Basic local exchange service in the context of this question may be considered as a service offering that approximates the local calling area of the ILEC, excludes optional features such as voice mail and may include additional minutes or unlimited minutes of local calling (i.e., equivalent to an ILEC residential flat rate line)).

RESPONSE: The term “basic local exchange service” is essentially a landline term. Wireless carriers such as i-wireless do not differentiate between local and domestic long distance calling areas, nor do they charge for additional features such as voicemail or caller ID.

i-wireless will allow a Lifeline customer to apply the Lifeline discount to any of the Company’s retail plans; so customers will have the choice of pay-per-use plans, minute-specific plans, or unlimited voice plans. Customers have the option to buy additional minutes at any time.

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LM 1.19: Please describe with specificity any unique advantages or disadvantages i-wireless' voice service offerings may have in relation to those of a) an ILEC or other landline carrier and b) other wireless ETC carriers providing service in i-wireless' requested ETC service area.

RESPONSE: Please see answer to LM 1.16 above.

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- LM 1.20: As there is no mention of it in the application, please specify if i-wireless intends to provide qualified Lifeline customers with a free handset.
- a. If i-wireless will be providing qualified Lifeline customers a free handset, please specify the possible handset models that will be provided and specify if these will be new handsets or refurbished handsets; and
 - b. If i-wireless will not be providing free handsets to qualified Lifeline customers in Arizona, please explain in detail why i-wireless has indicated it will provide free handsets to qualified Lifeline customers in Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, the Commonwealth of Virginia and the District of Columbia, as shown in Exhibit A of its WC Docket No. 09-197 Petition but not to Arizona's qualified Lifeline customers.

RESPONSE: i-wireless will provide qualified Lifeline customers with a free handset. These handsets will generally be refurbished handsets, though some will be new. By way of example, the first group of phones will be refurbished LG145s, a quality data capable flip phone. Understanding this market, we believe that customers would prefer a higher end refurbished phone than a low-end, new phone. While keeping cost down, we will endeavor to source up-to-date phones that are data capable and desirable.

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LM 1.21: Would a Lifeline customer be able to use a non-i-wireless branded handset for Lifeline service? For example, if a customer had a handset that was not being used but had another cell service name on the handset, such as AT&T, Cingular, T-Mobile, Sprint or Verizon, would that handset be compatible for use with i-wireless' Lifeline service? If not, please explain in detail why not.

RESPONSE: i-wireless' phones have been through extensive testing in Sprint's handset lab to ensure proper network performance, 911 reliability, and to make sure the handset does not cause network interference. Therefore, the Company cannot allow non-i-wireless branded handsets on the network. Testing these phones one at a time would be cost prohibitive.

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LM 1.22: If the cost of a handset ranges from \$30 to \$90 per unit, how is i-wireless able to recover the full cost of a handset that it provides at no charge to the customer?

RESPONSE: i-wireless anticipates an average cost of \$25, though some handsets will be in the \$30+ range. i-wireless will make a slight monthly margin which will recoup the upfront costs over time.

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January 7, 2011**

LM 1.23: Please explain i-wireless' policy and procedures for handsets as follows:

a. Replacing lost handsets;

RESPONSE: Customers call the customer care toll free number to get a replacement phone.

b. Deactivating stolen handsets;

RESPONSE: Customers call customer care toll free number to suspend their account, to prevent unauthorized usage, and to deactivate the phone.

c. Replacing stolen handsets;

RESPONSE: Customers call the customer care toll free number to get a replacement phone.

d. Replacing handsets that malfunction but have no physical or water damage;

RESPONSE: Customers call the customer care toll free number to get a replacement phone.

e. Replacing handsets that malfunction due to physical and/or water damage;

RESPONSE: Customers call the customer care toll free number to get a replacement phone.

All Contacts Providing Information/Response for the above question:

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LM 1.23 (Cont'd):

- f. Does i-wireless provide an insurance option for handsets? And

RESPONSE: i-wireless' experience is that insurance programs are not cost effective, so this option is not available.

- g. Is there a limit as to how many "free" replacement handsets will be issued to a LifeLine customer? If so, what is that limit?

RESPONSE: Lifeline customers will be provided one free phone per year, unless the phone has malfunctioned for reasons other than customer mistreatment.

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LM 1.24: What is the amount of free usage to be offered to Arizona qualified households and is that usage for local, long distance or both? In addition, please specify if any unused free minutes will expire, roll over to the next month and if the unused free minutes will continue to accumulate until used.

RESPONSE: Please see a detailed description of i-wireless' Lifeline rate plans, including free usage and rollover minutes, attached hereto as Exhibit 4. All minutes may be used for local or domestic long distance calling. Taking the 150-Minute plan as an example, customers will receive 150 free minutes per month and up to 150 unused minutes may be rolled over to the following month. The following scenario would occur if a customer used 50 minutes in months one and two, and no minutes in month three:

Month 1 = 150 free minutes
- 50 minutes used
100 minutes remaining

Month 2 = 150 free minutes
+100 rollover minutes from month 1
- 50 minutes used
200 minutes remaining

Month 3 = 150 free minutes
+150 rollover minutes (the max) from month 2
300 minutes remaining

Month 4 = 150 free minutes
+150 rollover minutes (the max) from month 3

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LM 1.25: If the Company's response to LM 1.24 above states the amount of free usage will vary by ILEC service area, in tabular form by ILEC, please provide the amount of support dollars and resulting minutes of free usage that will be offered. To the extent applicable, separately identify the information for qualified customers on Tribal Lands.

RESPONSE: The amount of free usage does not vary by ILEC service area; it will only vary by non-tribal and tribal lands.

	Support Dollars	Free Minutes
Non-Tribal ILEC	\$15.00	150
Tribal ILEC	\$39.00	Unlimited

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LM 1.26: Please describe with specificity the Lifeline offering(s) that would be provided by i-wireless. In particular, provide any features that would be included, minutes of local use that would be included, scope of the local calling area, specifics about any types of free calls that might be included, how any local usage above that included with the service offering(s) would be priced and the price of each and every Lifeline offering i-wireless intends to offer to Arizona qualified households.

RESPONSE: Please see attached Exhibit 4.

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LM 1.27: Are there any class of calls for which usage does not accrue, such as calls to 911, 611 (i-wireless customer service), government agencies, hospitals, schools, etc?

RESPONSE: i-wireless does not charge for calls to 911 or 611 (exception: if a customer chooses the 250-minute plan option they forego the free calls to 611). The Company is considering free calls to and from certain agencies under special programs to ensure call availability, but has no set plans as of yet.

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LM 1.28: With respect to i-wireless' customer service, operator service and directory assistance services, will assistance be provided in any languages other than English? If yes, please list the languages.

RESPONSE: i-wireless has English and Spanish customer service and directory assistance service available.

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LM 1.29: If i-wireless intends to obtain operator or directory assistance services from other carriers, please list these carriers and their capabilities to provide assistance in languages other than English.

RESPONSE: i-wireless' directory assistance is provided by Sprint, who provides this service in Spanish as well as English.

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LM 1.30: Please describe with specificity additional services [e.g., text messaging, broadband (specify speed), etc.] offered by i-wireless in the requested ETC service area.

RESPONSE: i-wireless provides incoming text messaging for free. Outgoing text messages are 10 or 20 cents each, depending on the plan (10 cents on the basic Lifeline offering). Caller ID, call waiting, voice mail and data access for self service care (such as balance inquiries) are always free. Web browsing is also available.

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LM 1.31: Are there any additional services offered by i-wireless where it is licensed as a CMRS reseller that would not be offered in Arizona should the Company receive ETC designation? If yes, please explain.

RESPONSE: No. Arizona customers will have access to all products, services and rate plans.

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LM 1.32: What is the specific timeframe anticipated in setting up the implementation procedures and internal systems to offer Lifeline programs?

RESPONSE: i-wireless anticipates that it will need up to 30 days to implement its processes and procedures for its Lifeline program in Arizona.

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LM 1.33: How will Lifeline customers know in advance the number of free minutes they will have and when more will be added under the proposed offering(s)? How will such customers know how many minutes they have left to use before the next month's minutes will be added?

RESPONSE: Lifeline customers will have detailed materials in the box with their phone that describe the number of minutes/credit they receive and when the minutes/credit will be replenished. Additionally, a text message will be sent (free of charge) notifying them when their account is refilled. i-wireless customers can check the balance of their minutes for free at anytime, either online, by calling #LEFT (#5338) from their i-wireless phone or by accessing the WAP deck via their phone, on data capable phones.

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LM 1.34: Please specify the increments in which Lifeline customers may purchase additional minutes, starting with the lowest increment.

RESPONSE: Customers may purchase additional minutes in denominations of \$10, \$20 or \$50.

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LM 1.35: i-wireless' prepaid cards and prepaid minutes purchased from the website or by phone are, in effect, a deposit from its customers. What is i-wireless' position with respect to a requirement to obtain a bond to protect i-wireless' customers in the event i-wireless ceases operations?

RESPONSE: Due to federal support dollars, Lifeline customers are able to attain wireless service for free and thus are not required to make any prepayments or deposits.

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LM 1.36: Will i-wireless' Lifeline customers billed for any minutes of use for text messages originated by i-wireless?

RESPONSE: No; all text messages originating from i-wireless to the customer are free of charge. This is even the case if a customer elects the 250-Minute plan and thereby foregoes the "perks", such as free incoming text messages. All system generated, customer notification text messages are free.

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LM 1.37: How will i-wireless, through its various sales channels (including its website), make customers aware of their eligibility to receive Lifeline and Link Up support?

RESPONSE: i-wireless will market to Lifeline customers via a number of different methods. Printed cash register receipt notices will be printed for customers using forms of payment that qualify for the program in stores that have that capability and with whom i-wireless has entered into an agreement (currently 118 separate, physical locations). i-wireless will also utilize radio, in-store signage, bus/public transit signage and print advertising. i-wireless is discussing with a number of companies that provide social services the possibility of marketing through their programs in order to reach more customers.

i-wireless is not eligible to receive reimbursement for, and will not advertise, Link Up support.

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LM 1.38: How will i-wireless apply such support to the cost of its various service packages?

RESPONSE: In the spirit of universal service, i-wireless credits a Lifeline discount of \$15.00 towards any of its service plans (excluding a text-only plan) in any state. i-wireless applies USF-reimbursed Lifeline support dollars towards the \$15.00 credit, and then the Company funds the remainder of the discount out-of-pocket. The credit is applied to a customer's account at the time of Lifeline activation, and then automatically thereafter on a monthly (30-day) cycle.

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LM 1.39: Please describe in detail and provide representative samples of how i-wireless advertising of its Lifeline offerings.

RESPONSE: i-wireless currently markets its retail services, and will likewise market its Lifeline product, through 118 Kroger-owned stores across the state of Arizona. This marketing will include signage and instructional materials on end caps in each store. To reach customers who qualify for the program, cash register receipt information will be printed for those customers who use a program-qualifying method of payment. i-wireless will also utilize direct mail, conventional advertising (e.g., radio) and non-conventional advertising (e.g., bus wraps/signage) to reach qualified customers. In addition, i-wireless plans to distribute brochures at various state and local social service agencies, and intends to partner with nonprofit assistance organizations (such as Habitat for Humanity), in order to inform customers of the availability of its Lifeline services.

i-wireless has branded its Lifeline offering as "Access Mobile brought to you by i-wireless." The Company is currently developing its marketing collateral through an advertising agency, and has provided a Lifeline Creative Brief which is attached as Exhibit 5, along with a sample cash register receipt advertisement.

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LM 1.40: In reference to advertising, will i-wireless be coordinating with the Arizona Department of Economic Security or any Community Action Agencies? If yes, please explain in detail those coordinating activities.

RESPONSE: i-wireless does not have specific plans with these agencies, but is open to cooperative programs of this nature.

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LM 1.41: Referencing page 12 of the Petition and i-wireless' advertising of its Lifeline programs:

- a. Describe the frequency of such advertising by media type; and

RESPONSE: i-wireless has not established the frequency of our advertising. The Company will track success for each advertising medium and will repeat those with good response rates.

- b. What languages will be used in the advertising?

RESPONSE: Advertising will be in English and, where it makes sense based on demographics, Spanish.

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LM 1.42: Referencing page 13 of the Petition, provide a copy of the form that i-wireless uses for customers to self-certify they are Lifeline eligible.

RESPONSE: See attached Exhibit 6.

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LM 1.43: Describe in detail what process i-wireless will employ to ensure that a) a customer is eligible for Lifeline support; and b) a customer is not receiving supported services from an ILEC, another Competitive ETC or i-wireless at the customer's service address.

RESPONSE: During the enrollment process, applicants will be directed to a toll-free telephone number and to i-wireless' website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. Applicants must complete an enrollment form which will include a place where applicants must attest and certify under penalty of perjury that they satisfy the requisite eligibility criteria. For program-based eligibility, the form will list each of the qualifying programs, and the applicant must indicate the program(s) in which he/she participates. For income-based eligibility, the applicant is 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 for federal default states) and will be required to provide proof of income-based eligibility.

In addition, each applicant is required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from i-wireless. The applicant must return the signed enrollment form and all supporting documentation to the address provided by i-wireless. Processing of consumers' applications, including review of all application forms and relevant documentation, will be processed by an experienced reviewer to ensure that the application and any supporting documentation meet the requirements of the program.

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LM 1.43 (Cont'd):

i-wireless Lifeline application forms will require each applicant to provide their name, primary residential address and an alternate telephone number (if any). i-wireless will incorporate this information into its customer information database. The Company will check the name and address of each Lifeline applicant against its database to determine whether or not it is associated with a customer that 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 address. i-wireless will deny the Lifeline application of any such individual and advise the applicant of the basis for the denial. As mentioned above, applicants must self-certify, under penalty of perjury, at the time of service activation and annually thereafter, that they remain head of household and receive Lifeline-supported service only from i-wireless. In addition, where Commissions have databases and procedures in place, i-wireless will work with them to verify eligibility and that the names and addresses of i-wireless applicants are not already receiving Lifeline support from any other carrier.

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LM 1.44: How will i-wireless verify that a subscriber meets one or more of the Universal Service Administrative Company's or Arizona's Low Income eligibility criteria?

RESPONSE: Please see answer to LM 1.43 above. In addition, i-wireless has contracted with a company, Solix, that is very experienced in Lifeline program rules and regulations and the application approval and storage process, to ensure that i-wireless is in compliance at all times.

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LM 1.45: Describe in detail i-wireless' procedures for handling customer complaints.

RESPONSE: i-wireless Lifeline customers will have access to i-wireless' customer care (the same customer care as regular retail customers) by calling 611 from their i-wireless Lifeline phone or the company's toll-free number. i-wireless contracts with a high quality, U.S. domestic customer care group, and has recently implemented a "call back" feature for customer convenience. Customers can also contact customer care on the i-wireless website. Furthermore, there are 118 retail locations in Arizona where customers can ask questions or buy additional airtime, should they wish to do so. i-wireless is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.

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LM 1.46: How will i-wireless respond to consumer complaints/inquiries for supported services that are received by the ACC and forwarded to i-wireless for a response and/or resolution?

RESPONSE: Once i-wireless is made aware of consumer complaints/inquiries, i-wireless will respond by a trained customer care supervisor or manager within 24-48 hours. Where a phone number is associated with the complaint, the customer will be contacted by telephone (minutes will not count against the customer). Otherwise, i-wireless will use e-mail or regular mail, depending on the customer's preference or the information available to i-wireless.

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LM 1.47: Please affirm that i-wireless is not seeking Arizona Universal Service funds as part of its Petition to be designated as an ETC.

RESPONSE: i-wireless is not seeking Arizona Universal Service funds as part of its Petition to be designated as an ETC.

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LM 1.48: Please certify that i-wireless will comply with all requirements for expanded eligibility criteria, certification, verification and recordkeeping requirements in ACC Decision No. 67941.

RESPONSE: i-wireless will comply with all requirements for expanded eligibility criteria, certification, verification and recordkeeping requirements in ACC Decision No. 67941.

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LM 1.49: Please describe with specificity the full range of benefits i-wireless believes its Lifeline offering(s) will bring to Arizona consumers.

RESPONSE: With its Lifeline wireless offering, i-wireless provides mobility and convenience in addition to subsidized service. i-wireless customers can make nationwide calls at no additional charge. i-wireless provides Arizona Lifeline customers with choices, such as the option of applying the Lifeline discount toward its retail plans. i-wireless also provides a quality service, such as its premium customer care service. Customer care calls are answered by a personal representative, on average, in about 2 minutes while some of the Company's competitors may take 20 minutes before allowing a customer to talk to a live person. i-wireless Lifeline customers will receive a data-capable handset for free, and will be able to call 911 even if there are no minutes remaining on their account.

Furthermore, i-wireless customers can earn additional free minutes (or dollar credits toward their account, if on an unlimited voice plan) simply by purchasing their groceries at Kroger.

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LM 1.50: Has i-wireless prepared an informational tariff to file with the Commission describing the terms, conditions and content of i-wireless' universal service offering(s)? If yes, please provide a copy of the proposed tariff. If no, please prepare and submit a proposed tariff.

RESPONSE: i-wireless is in the process of preparing an informational tariff.

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E-mail: pat.mcdonough@iwirelesshome.com

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.51: Has i-wireless reviewed the informational tariffs provided to the ACC by other Arizona wireless competitive ETCs? Does i-wireless commit to providing an informational tariff of comparable information content?

RESPONSE: i-wireless commits to providing an informational tariff of comparable information content to that of other wireless competitive ETCs.

All Contacts Providing Information/Response for the above question:

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i-wireless, LLC
1 Levee Way, Suite 3104
Newport, Kentucky 41071
Telephone: (513) 378-1731
E-mail: pat.mcdonough@iwirelesshome.com

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.52: Identify all states in which i-wireless or any of its affiliates has a pending Petition or Application for ETC status. For each pending Petition or Application, please provide the following:

- a) Identify whether the Petition or Application is before the FCC or the state commission;
- b) Provide the date the Petition or Application was filed;
- c) Whether the Petition or Application is for rural, non-rural or both;
- d) Whether the Petition or Application includes Tribal Lands; and
- e) A summary of the current status of the Petition or Application.

RESPONSE:

State	Commission	Date Filed	Service Area	Tribal	Status
AL	FCC	8/25/10	Both	No	Pending
AZ	Arizona	8/6/10	Both	Yes	Pending Procedural Schedule
CA	California	10/7/10	Non-rural	No	Pending
CO	Colorado	12/9/10	Non-rural	No	Pending
CT	FCC	8/25/10	Both	No	Pending
D.C.	FCC	8/25/10	Both	No	Pending
DE	FCC	8/25/10	Both	No	Pending
GA	Georgia	8/6/10	Both	No	Pending
IN	Indiana	8/25/10	Both	No	Hearing 1/11/10
KS	Kansas	9/28/10	Both	No	Pending
KY	Kentucky	12/3/10	Non-rural	No	Pending
MI	Michigan	10/5/10	Both	No	Pending
NH	FCC	8/25/10	Both	No	Pending
NY	FCC	8/25/10	Both	No	Pending
NC	FCC	8/25/10	Both	No	Pending
OR	Oregon	11/22/10	Non-rural	Yes	Pending Procedural Schedule
TN	FCC	8/25/10	Both	No	Pending
UT	Utah	8/12/10	Both	No	Pending Procedural Schedule
VA	FCC	8/25/10	Both	No	Pending
WA	Washington	9/30/10	Both	Yes	Pending Data Request

All Contacts Providing Information/Response for the above question:

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E-mail: pat.mcdonough@iwirelesshome.com

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.53: On an ongoing basis, provide updates to i-wireless' response to LM 1.52, should changes in status occur.

RESPONSE: i-wireless commits to provide updates to its responses to LM 1.52 above should changes in status occur.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.54: Should i-wireless file any new Petitions or Applications in additional states or be granted ETC status, on a going forward basis, a copy of said Petition or Application or Order or Decision shall be provided to ACC Staff. Any updates should also be provided on an ongoing basis.

RESPONSE: i-wireless agrees to provide copies of said Petitions or Applications or Orders or Decisions to ACC Staff on an ongoing basis.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.55: In any of the states or at the FCC in which i-wireless has petitioned or applied for ETC designation, have any ILECs, competitive ETCs or other Interveners objected? If yes, please identify on what was the basis of the objection.

RESPONSE: i-wireless applied for ETC designation in CO in August 2010. The CO 911 Authority Boards intervened to ensure that i-wireless, as a prepaid carrier offering free service, would collect and remit the emergency telephone charge. i-wireless currently remits the charge for its retail customers and was prepared to certify that it would do so for its Lifeline customers. i-wireless withdrew its CO application in October 2010 and filed an updated application on December 9, 2010.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.56: Please explain in detail how i-wireless will certify that Lifeline 911 calls will route to the correct PSAP and that the PSAP is capable of accepting such calls.

RESPONSE: i-wireless' 911 service works the same way that Sprint's does. i-wireless' service is on Sprint's network, utilizing all of the same network elements and systems. All of i-wireless' handsets are approved by Sprint's handset lab, which focuses first and foremost on 911 capability.

As required in its grant of forbearance from the FCC, i-wireless plans to send letters, upon approval as an ETC in Arizona, to all applicable PSAPs requesting certification that i-wireless' customers receive 911 and E911 services. i-wireless plans to consult with the Arizona 911 Coordinator prior to requesting PSAP certifications in Arizona.

All Contacts Providing Information/Response for the above question:

Patrick McDonough
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1 Levee Way, Suite 3104
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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.57: Please provide a declaration from i-wireless' underlying carrier verifying that it will treat 911 calls from i-wireless' customers on the underlying carrier's network in the same manner as 911 calls from the underlying carrier's own retail customers.

RESPONSE: Please see attached Exhibit 7. i-wireless has requested a formal declaration from Sprint as well, and will forward it to the Commission upon receipt.

All Contacts Providing Information/Response for the above question:

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i-wireless, LLC
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E-mail: pat.mcdonough@iwirelesshome.com

**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.58: Does i-wireless provide support or make the necessary monthly payments for the Arizona Universal Service Fund ("AUSF") as required in A.A.C. R14-2-1204(A) and (B)? If not, please explain in detail why not and the response must include, and is not limited to, any and all supporting documentation as to why i-wireless does not provide support or make payments for the AUSF.

RESPONSE: Yes, i-wireless makes the necessary monthly payments for the AUSF as required in A.A.C. R14-2-1204(A) and (B). The Company also makes the necessary payments for the Arizona Transaction Privilege Tax (State, County and local).

All Contacts Providing Information/Response for the above question:

Patrick McDonough
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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.59: Does i-wireless provide support or make the necessary payments for the Arizona Telecommunications Relay Services Fund ("ATRSF") as required in A.R.S. §§ 42-5252(B) and 42-5253(B)(2)? If not, please explain in detail why not and the response must include, and is not limited to, any and all supporting documentation as to why i-wireless does not provide support or make payments for the ATRSF.

RESPONSE: i-wireless has not historically paid ATRSF. The Company has been strictly a prepaid carrier, until just recently, and has interpreted ATRSF as a postpaid fee. i-wireless has recently moved into the postpaid market and remitted its first ATRSF payment with its November payment.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

LM 1.60: Does i-wireless provide support or make the necessary payments for the AETSRF as required in A.R.S. §§ 42-5252(A) and 42-5253(A)? If not, please explain in detail why not and the response must include, and is not limited to, any and all supporting documentation as to why i-wireless does not provide support or make payments for the AETSRF.

RESPONSE: i-wireless has not historically paid AETRSF. The Company has been strictly a prepaid carrier, until just recently, and has interpreted AETRSF as a postpaid fee. i-wireless has recently moved into the postpaid market and remitted its first AETRSF payment with its November payment.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
i-wireless, LLC
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January 7, 2011**

LM 1.61: Does i-wireless provide support or make the necessary payments for the Federal Universal Service Fund ("USF")? If not, please explain in detail why not and the response must include, and is not limited to, any and all supporting documentation as to why i-wireless does not provide support or make payments for the Federal USF.

RESPONSE: Yes, i-wireless makes the necessary payments for the federal USF.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
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i-wireless, LLC
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LM 1.62: If i-wireless' position to any and/or all the questions above that it is a pure reseller and that its underlying carriers pay into any and/or all of the above funds, please provide all supporting documentation, such as portions of its contracts with the underlying carriers that demonstrates the underlying carriers' agreement or obligation to submit such support on behalf of i-wireless.

RESPONSE: Not applicable.

All Contacts Providing Information/Response for the above question:

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**ARIZONA CORPORATION COMMISSION
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i-wireless, LLC
Docket No. T-20538A-10-0332
January 7, 2011**

Additional Information

In an effort to address the issues regarding prevention of waste, fraud and abuse of the federal USF mechanism, i-wireless commits to the following:

- Provide the Commission with data that will enable the state to track 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, for the purpose of permitting the Commission to determine whether an existing Lifeline customer receives Lifeline service from another carrier;
- Promptly investigate any notification that it receives from the Commission 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 concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations;
- Implement the following 60-day non-usage policy: If no usage appears on an i-wireless Lifeline customer's account during any continuous 60-day period, i-wireless will promptly notify the customer that the customer is no longer eligible for i-wireless Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but i-wireless will engage in outreach efforts to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, receiving or sending a text message, downloading data or adding money to the account), i-wireless will deactivate Lifeline services for that customer and cease to seek reimbursement from the federal USF at the end of the 30-day grace period.

All Contacts Providing Information/Response for the above question:

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January 7, 2011**

Additional Information (Cont'd)

Furthermore, i-wireless monitors for fraud and abuse with respect to credit card billing, usage and other potential areas of misuse. i-wireless is aware that some providers have been targeted by individuals who have resold the Lifeline product on the open market. i-wireless will monitor activities and thoroughly investigate any abuses of the program. Any inappropriate findings will result in discontinuing service for individual accounts/phones and/or terminating partnerships. The Company will cooperate with the FCC and/or state commissions regarding any questionable activity.

i-wireless believes that the first line of defense against fraud and abuse is to partner with high quality channels and organizations. By emphasizing the social benefits of the program and partnering with those focused on the benefits to their constituents, the Company believes that it can avoid potential misuse of the program. To further protect the integrity of the USF, i-wireless has contracted with: (a) Solix, a well-known, experienced and reputable firm in the USF industry, to assist in reviewing customer applications and verifying eligibility, and to ensure that i-wireless is in compliance with federal and state regulations at all times; and (b) CGM, LLC of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate i-wireless' subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address 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: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, i-wireless ensures that it does not over-request from support funds.

All Contacts Providing Information/Response for the above question:

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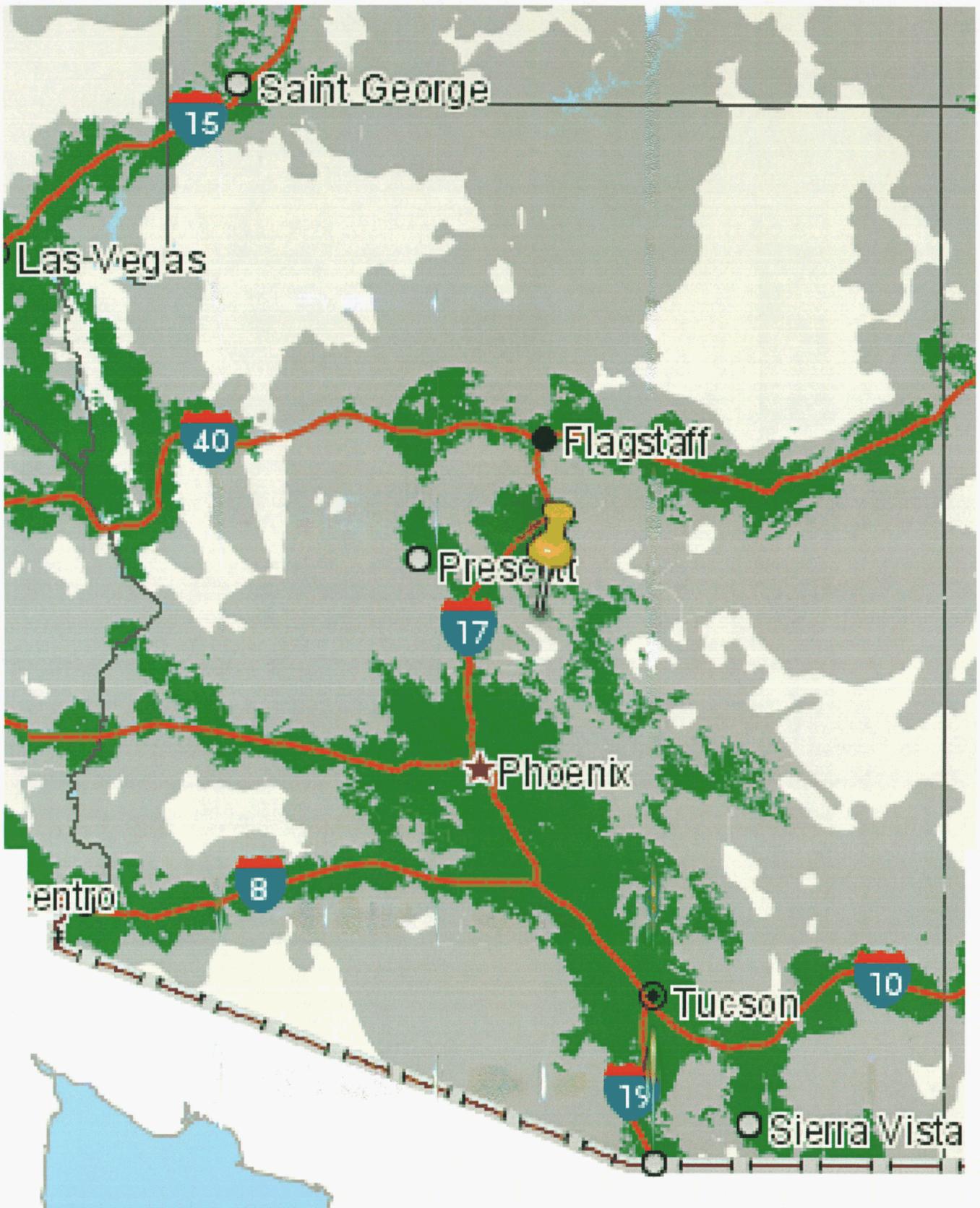
EXHIBIT 1

Arizona ILECs

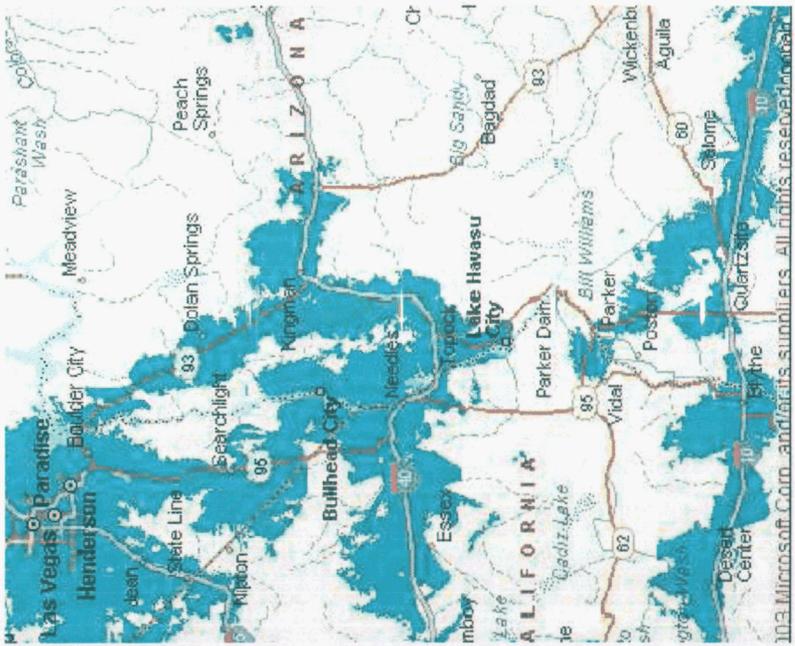
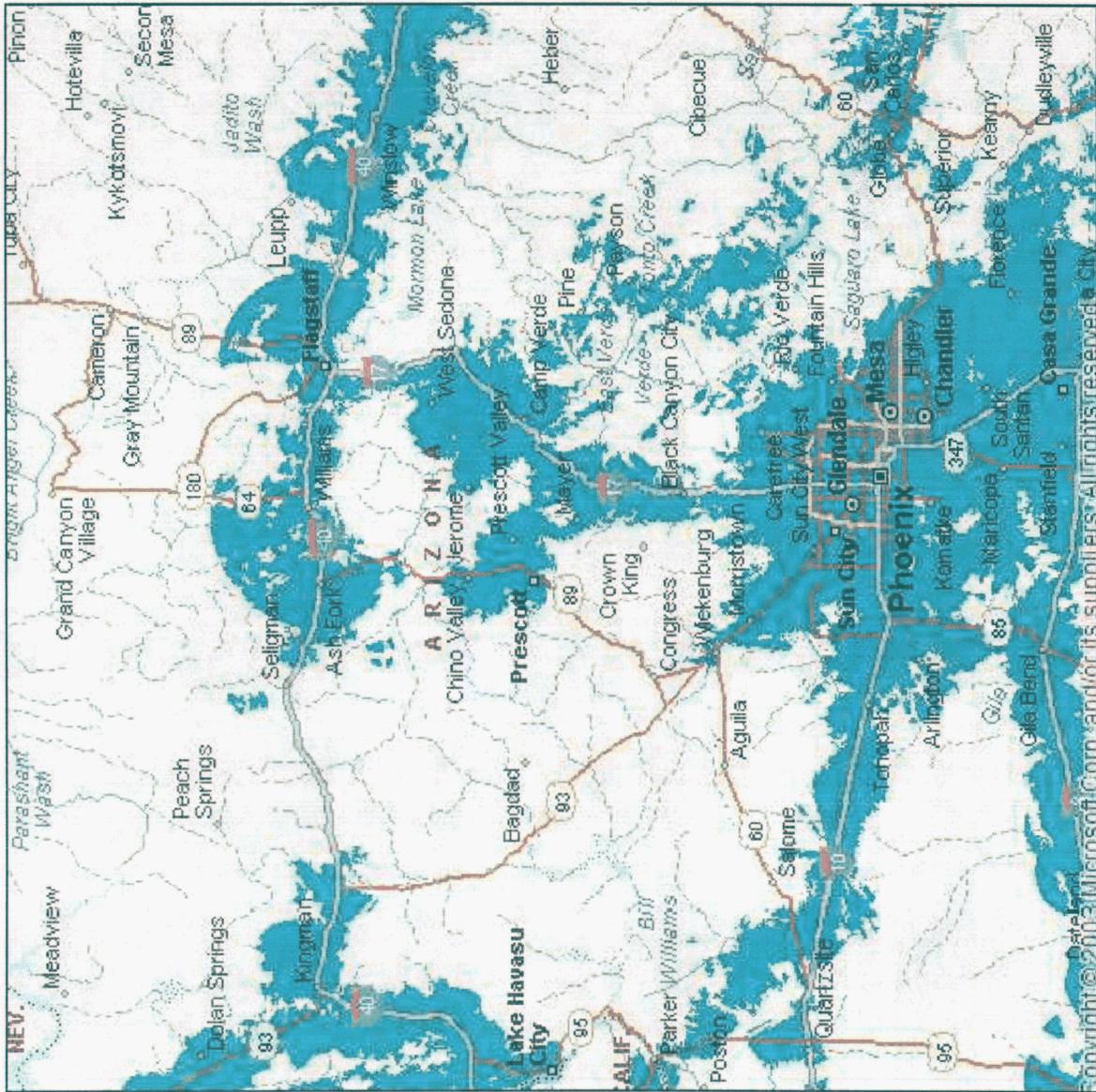
SAC	Legal Name of ILEC	Type	Monthly Support \$ Per Customer	Monthly Free Minutes Per Customer
452191	Accipiter Communications, Inc.	Rural	\$15.00	150
452171	Arizona Telephone Company	Rural	\$15.00	150
454426	Citizens Telecommunications Co. of the White Mountains, Inc.	Rural	\$15.00	150
452172	Citizens Utilities Rural Telephone Company, Inc.	Rural	\$15.00	150
452176	Copper Valley Telephone, Inc	Rural	\$15.00	150
452200	Fort Mojave Telecommunications, Inc	Rural/Tribal	\$39.00	Unlimited Voice
452179	Gila River Telecommunications, Inc.	Rural/Tribal	\$39.00	Unlimited Voice
450815	Hopi Telecommunications, Inc.	Rural/Tribal	\$39.00	Unlimited Voice
452226	Midvale Telephone Exchange, Inc.	Rural	\$15.00	150
454449	Navajo Communications Company, Inc.	Rural	\$15.00	150
455101	Qwest Corporation	Non-Rural	\$15.00	150
552356	Rio Virgin Telephone Co. Inc.	Rural	\$15.00	150
457991	Saddleback Communications	Rural/Tribal	\$39.00	Unlimited Voice
452169	San Carlos Apache Telecommunications Utility, Inc.	Rural/Tribal	\$39.00	Unlimited Voice
502286	South Central Utah Tel. Assn. Inc.	Rural	\$15.00	150
452174	Southwestern Telephone Company	Rural	\$15.00	150
453334	Table Top Telephone Co., Inc	Rural	\$15.00	150
452173	Tohono O'Odham Utility Authority	Rural/Tribal	\$39.00	Unlimited Voice
452176	Valley Telephone Cooperative, Inc.	Rural	\$15.00	150
452302	Verizon California, Inc.	Rural	\$15.00	150

EXHIBIT 2

Coverage Area Maps

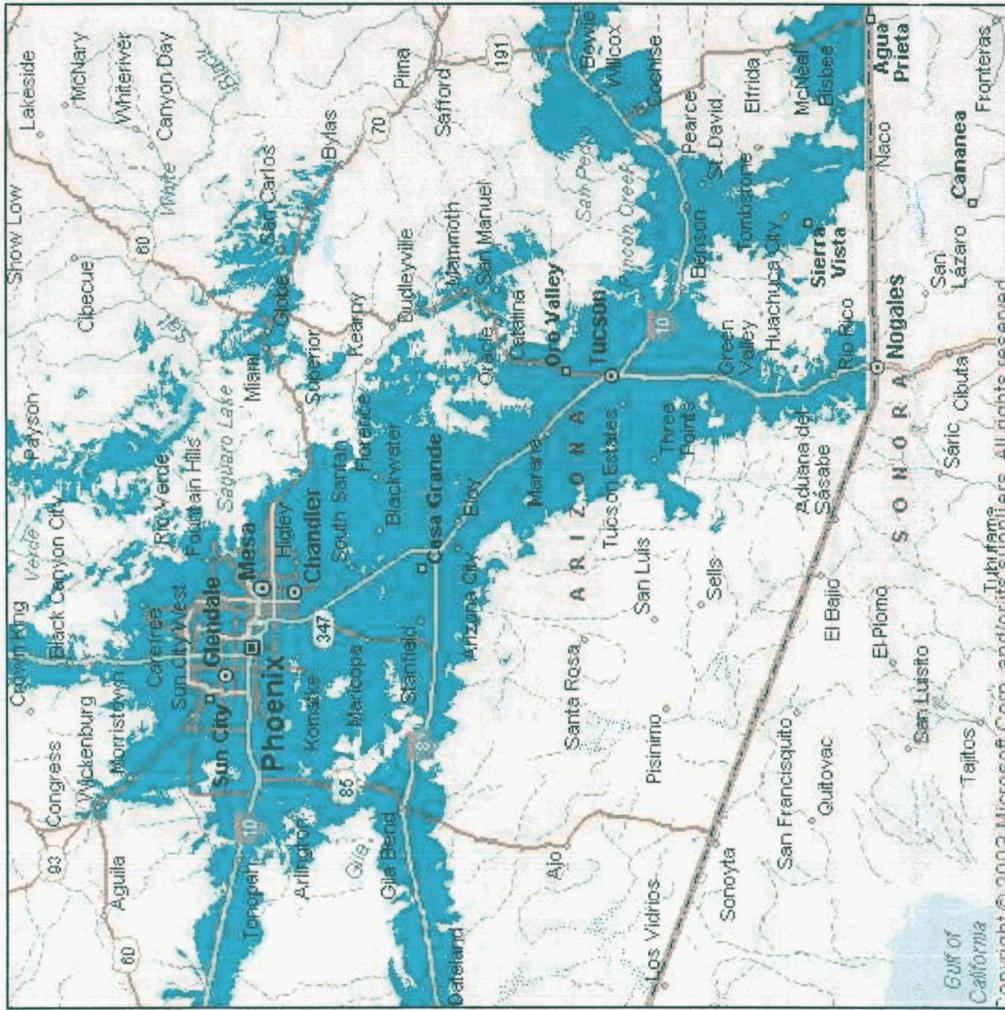
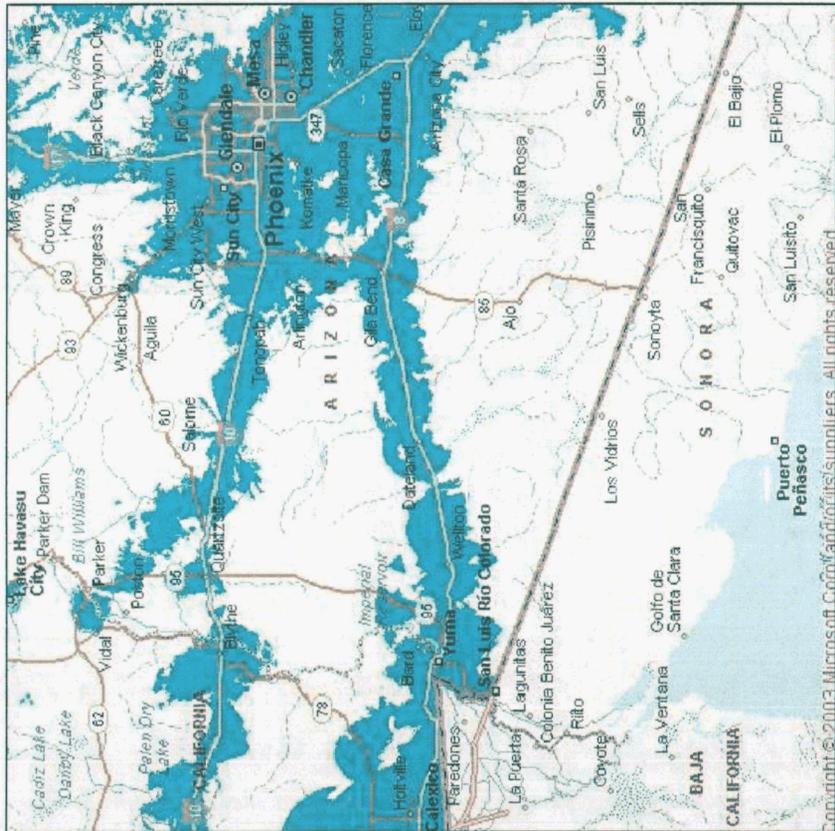


 i-wireless coverage Area




i-wireless
coverage area

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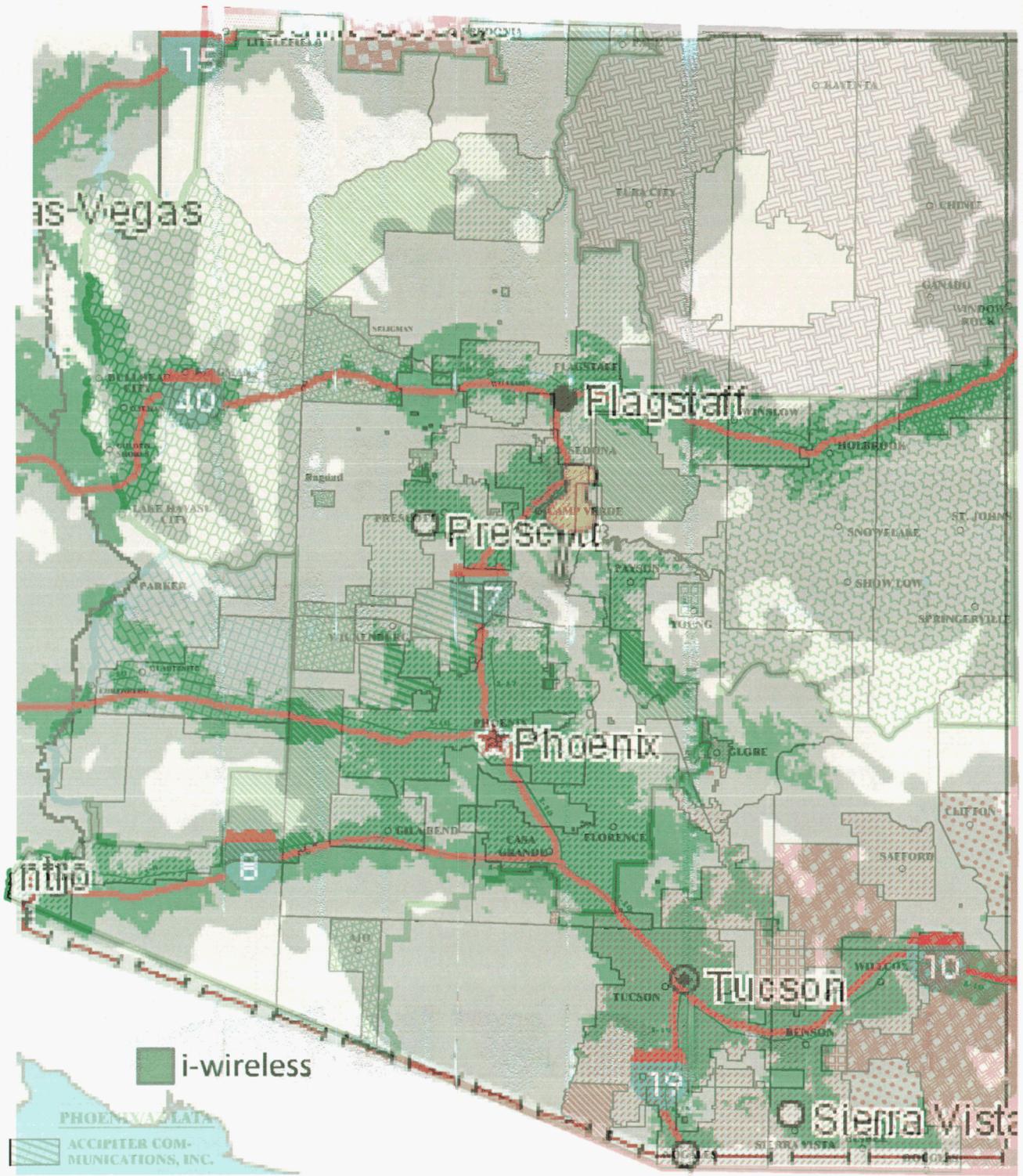


 i-wireless coverage area

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EXHIBIT 3

ILEC service area map & map of Tribal lands



i-wireless

PHOENIX/AZ LATA

- ACCIPITER COMMUNICATIONS, INC.
- ARIZONA TELEPHONE COMPANY
- CLINTON CITIZEN TELEPHONE RURAL
- FRONTIER COMMUNICATIONS OF THE WHITE MOUNTAINS
- MIDVALE TELEPHONE EXCHANGE, INC.
- TABLE TOP TELEPHONE COMPANY, INC.
- QWEST COMMUNICATIONS, INC.

TUCSON/AZ LATA

- ARIZONA TELEPHONE COMPANY
- COPPER VALLEY TELEPHONE, INC.
- MIDVALE TELEPHONE EXCHANGE, INC.
- QWEST COMMUNICATIONS, INC.
- VALLEY TELEPHONE COOPERATIVE, INC.

INDEPENDENT MARKET AREA

- NAVAJO COMMUNICATIONS COMPANY, INC.
- LOS ANGELES/CA LATA
- VERIZON CALIFORNIA, INC.
- SOUTHWESTERN TELEPHONE CO.

UTAH/UT LATA

- RIO VIRGIN TELEPHONE COMPANY
- SOUTH CENTRAL UTAH TELEPHONE ASSOC., INC.

Revised June 27, 2007

STATE OF ARIZONA TELEPHONE WITH LATA

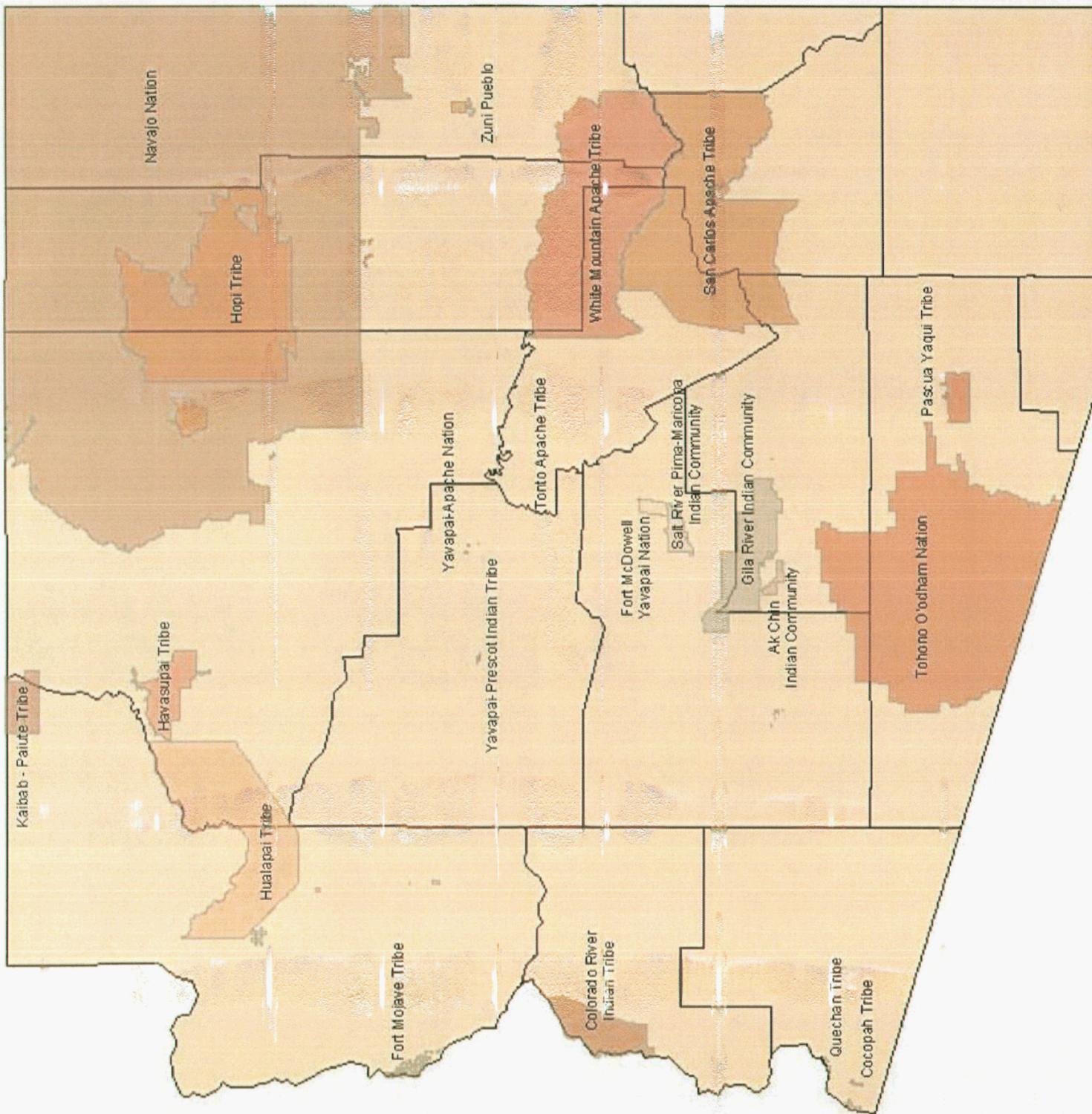


EXHIBIT 4

i-wireless, LLC's Lifeline Rates (Non-Tribal)

Option 1: Lifeline 150 Minutes Plan*

150 anytime minutes per month

(additional usage priced at 10 cent minutes and 10 cent text messages)

Net cost to Lifeline customer: **\$0 (free)**

**includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 150 minutes can be rolled over to following month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

Option 2: Lifeline 250 Minutes Plan*

250 anytime minutes per month

(additional usage priced at 10 cent minutes and 10 cent text messages)

Net cost to Lifeline customer: **\$0 (free)**

**includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to 911 emergency services
- Free balance inquiries

***additional charges apply for:*

- incoming text messages (charge per text: 10 cents; one text message decrements one minute of use)
- calls to Customer Service (minutes decrement from customers 250 minutes)

****additional restrictions:*

- Minutes cannot be rolled over to next month
- Customer not eligible to earn additional minutes through the Kroger Free Minute Loyalty Program

i-wireless, LLC's Lifeline Rates (Non-Tribal) - Continued

Option 3: Lifeline \$15 Retail Discount Plan*

Lifeline eligible customers may choose any i-wireless monthly retail plan (excluding text only plans) at a \$15 discount. Current retail monthly plans are:

Talk Plans (monthly)

- 200 anytime minutes, unlimited text messages, unlimited data (web browsing and email) (additional usage priced at 10 cent minutes)
Net cost to Lifeline customer: **\$10** (plus applicable taxes and fees)
- Unlimited talk, unlimited text messages and unlimited data (web browsing and email)
Net cost to Lifeline customer: **\$40** (plus applicable taxes and fees)

****includes:***

- Free handset
- Free Voicemail, Caller-ID and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 1500 minutes can be rolled over to next month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

i-wireless, LLC's Lifeline Rates (Tribal)

Option 1: Lifeline Unlimited Talk*

Unlimited monthly voice usage

(outgoing text messages priced at 10 cents per message, data usage priced at \$1.00 per megabyte and billed in 500 kilobyte increments)

Net cost to Tribal Lifeline customer: **\$1**

Option 2: \$39 Retail Discount Plan*

Lifeline eligible tribal customers may choose any i-wireless monthly retail plan (excluding text only plans) at a \$39 discount. Current retail monthly plans are:

Talk Plans (monthly)

- 200 anytime minutes, unlimited text messages, unlimited data (web browsing and email) (additional usage priced at 10 cent minutes)
Net cost to Tribal Lifeline customer: **\$1** (plus applicable taxes and fees)
- Unlimited talk, unlimited text messages and unlimited data (web browsing and email)
Net cost to Tribal Lifeline customer: **\$16** (plus applicable taxes and fees)

**Both Options includes:*

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free incoming text messages
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- Up to 1500 minutes can be rolled over to following month
- Customer can earn additional free minutes through Kroger Free Minute Loyalty Program

EXHIBIT 5

Lifeline Creative Brief & Sample Advertisement

Lifeline Creative Brief (Non-Tribal)

About Access Mobile

Access Mobile is brought to you by i-wireless, LLC and is a Lifeline Assistance program supported by the federal Universal Service Fund for income eligible households. In order to qualify to receive an Access Mobile phone, persons must meet certain eligibility criteria determined by each individual State where the service is to be provided. These requirements are based on a person's participation in a state or Federal support programs or by meeting the Income Poverty Guidelines as defined by the United States government. Lifeline Assistance may only be provided to one phone line per household.

Program Overview

By qualifying to receive an Access Mobile phone, you will receive:

-A free phone with 911 access.

Offer:

Option 1 – Receive 150 Anytime Minutes per month for free. These minutes can be used to make/receive voice calls and send text messages. Calls to customer care are free. All incoming text messages are free. Unused minutes can carry over to the following month. Eligible for Free Minutes rewards program.

Option 2– Receive 250 Anytime Minutes per month for free. These minutes can be used to make/receive voice calls and send text messages. Calls to customer care are not free. Incoming text messages are not free. Minutes cannot carry over to the following month. Not eligible for Free Minutes rewards program.

Option 3 – Apply a \$15 credit toward any current i-wireless monthly rate plan, excluding text only plans. A \$15 credit will be applied to a customer's account every 30 days. Calls to customer care are free. All incoming text messages are free. Unused minutes can carry over to the following month. Eligible for Free Minutes rewards program.

Additional Payment Options

Access Mobile users can add value to their account by purchasing i-wireless airtime cards available at the Kroger family of stores or by using a debit or credit card over the phone or online.

FREE MINUTES Eligibility

Access Mobile users are eligible to participate in the FREE MINUTES rewards program and will adhere to the same business rules as i-wireless customers.

(No more than 30 FREE MINUTES can be earned for every \$100 in qualifying spending and a maximum of 1,000 minutes can be earned in a 30-day period. Unlimited rate plans will receive a dollar credit applied to the account in lieu of minutes. The dollar credit will not exceed thirty dollars in value within a 30-day period. FREE MINUTES are usually applied within 48 hours after the \$100 threshold for qualifying purchases is met. Customers qualify for the \$100 spent, regardless of their method of payment, e.g., food stamps/SNAP card.)

How to Qualify for an Access Mobile Phone

Eligibility to participate in the Lifeline Assistance program varies by state.

You may qualify for an Access Mobile phone if you currently participate in any of government-sponsored programs below:

- Medicaid
- Food Stamps
- Supplemental Security Income
- Temporary Assistance for Needy Families (TANF)
- Federal Public Housing Assistance (FPHA) or Section 8
- Low Income High Energy Assistance Program (LIHEAP)
- National School Lunch Program
- State Children's Health Insurance Programs (SCHIP) or Kids Care

or

- Your household income is at or below 150% of the federal poverty guidelines.

MANUFACTURERS COUPON



You qualify for a
FREE Cell Phone
& Airtime!

MANUFACTURERS COUPON

To find out how to
receive your **FREE** phone,
call **1-800-XXX-XXXX**

ACCESSMOBILE!
Brought to you by verizon

EXHIBIT 6

Customer Self-Certification Form

12348567



Arizona Lifeline Application

#1. PERSONAL INFORMATION

The person below **MUST BE** the same person applying for the discount. Please do not forget to sign the application below in Section #4.

First Name _____

Last Name _____

Home Address _____

City _____ **State** _____

#2. PROGRAM-BASED ELIGIBILITY

Check all current program(s) the person in Section A is enrolled. For the National School Lunch and Head Start programs, a household dependant enrolled in the program satisfies the enrollment requirement.

Please do not send	supporting documentation
<input type="checkbox"/> Food Stamps	<input type="checkbox"/> Medicaid
<input type="checkbox"/> National School Lunch Program's Free Lunch Program	<input type="checkbox"/> Temporary Assistance to Needy Families (TANF)
<input type="checkbox"/> Supplemental Security Income (SSI) (Not the same as Social Security Benefits)	<input type="checkbox"/> Federal Public Housing Assistance (FPHA)
<input type="checkbox"/> Supplemental State Children's Health Insurance Plan (SCHIP) or KidsCare	<input type="checkbox"/> Low-Income Energy Assistance Program (LIHEAP)

#3. INCOME-BASED ELIGIBILITY-

If qualifying by income: Make sure you list the income for ALL household members and provide ALL of your income documentation. If your household size is greater than 7, write the number and add \$5,610 to \$49,905 for each additional person.

Household Size:	1	2	3	4	5	6	7	Other
Check off the box which applies	<input type="checkbox"/>							
Maximum annual household income	\$16,245	\$21,855	\$27,465	\$33,075	\$38,685	\$44,295	\$49,905	\$ _____

You must attach proof of income for each household member as reported above, examples include:

- Prior year's State or Federal tax return
OR
Most recent type of current statement from the income source(s) noted below:
- Prior year's State or Federal tax return
 - **Three consecutive months** worth of your most current pay stubs
 - Social Security benefits statement
 - Veterans Administration benefits statement
 - Retirement/Pension benefit statement
 - Divorce decree or child support document
 - Unemployment/Workers Compensation benefits statement (Supporting documentation will NOT be returned)

In order to apply successfully you must:

1. Complete Sections #1, #2, #3(if not eligible via program) and sign section #4.
2. Attach documents to support proof of household income or program eligibility (if required)
3. Return application to:

Access Mobile
420 Progressive Drive
Mattoon, IL 61938

Phone Number: 1- (800) 464-6010
Assistance is available: 8:00am to 10:00pm CST

Fax Number: 1-877- to be determined
Website: www.accessmobil.com (TBD)

Disclosure Statement: BY SIGNING BELOW, I CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED WITHIN THIS APPLICATION IS TRUE AND CORRECT. I ACKNOWLEDGE THAT PROVIDING FALSE OR FRAUDULENT DOCUMENTATION IN ORDER TO RECEIVE ASSISTANCE IS PUNISHABLE BY LAW. I UNDERSTAND THAT LIFELINE IS ONLY AVAILABLE FOR ONE LANDLINE OR WIRELESS PHONE LINE PER HOUSEHOLD.

#4. SIGNATURE (Required) _____ **Date** _____



EXHIBIT 7

Declaration from Underlying Carrier

From: Cote, Steve A [WLS]
Sent: Friday, December 03, 2010 12:33 AM
To: Patrick McDonough
Subject: 911 Call Routing

Pat:

Sprint routes 911 calls from i-wireless' customers in the same manner as 911 calls from Sprint's own retail customers.

Stephen Cote
Sprint Wholesale Services
913.762.5488

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