

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



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

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

September 9, 2014

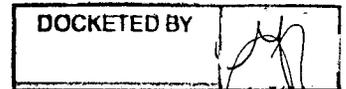
**VIA OVERNIGHT DELIVERY**

Docket Control Center  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007  
(602) 542-2237

**ORIGINAL**

Arizona Corporation Commission  
**DOCKETED**  
SEP 10 2014

T-04259A-14-0327



Re: Docket No.  
Global Connection, Inc. of America d/b/a Stand Up Wireless  
Application to Expand ETC Service Area

Dear Sir/Madam:

Enclosed please find for filing an original and thirteen (13) copies of Global Connection, Inc. of America d/b/a Stand Up Wireless' Application to Expand its Eligible Telecommunications Carrier Service Area.

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. Thank you.

Respectfully submitted,

*Kasey Chow*  
Kasey Chow  
Lance J.M. Steinhart, P.C.  
Attorneys for Global Connection, Inc. of America  
d/b/a Stand Up Wireless

Enclosures  
cc: William Moran

RECEIVED  
2014 SEP 10 P 12:49  
ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

2014 SEP 10 P 12:49

IN THE MATTER OF THE APPLICATION OF  
GLOBAL CONNECTION INC. OF AMERICA DBA  
STAND UP WIRELESS FOR APPROVAL OF A  
DESIGNATION AS A WIRELESS ELIGIBLE  
TELECOMMUNICATIONS CARRIER IN THE  
STATE OF ARIZONA (LOW INCOME ONLY)

COMMISSION  
BUCKET CONTROL

**APPLICATION OF GLOBAL CONNECTION INC. OF AMERICA  
D/B/A STAND UP WIRELESS TO EXPAND ITS ELIGIBLE  
TELECOMMUNICATIONS CARRIER SERVICE AREA**

Kasey Chow  
Lance J.M. Steinhart, P.C.  
Attorneys at Law  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: [kchow@telecomcounsel.com](mailto:kchow@telecomcounsel.com)

*Attorneys for Global Connection Inc. of America  
d/b/a Stand Up Wireless*

September 9, 2014

**BEFORE THE ARIZONA CORPORATION COMMISSION**

---

IN THE MATTER OF THE APPLICATION OF )  
GLOBAL CONNECTION INC. OF AMERICA DBA )  
STAND UP WIRELESS FOR APPROVAL OF A )  
DESIGNATION AS A WIRELESS ELIGIBLE )  
TELECOMMUNICATIONS CARRIER IN THE )  
STATE OF ARIZONA (LOW INCOME ONLY) )

---

Docket No. T-04259A-11-0392

**APPLICATION OF GLOBAL CONNECTION INC. OF AMERICA  
D/B/A STAND UP WIRELESS TO EXPAND ITS ELIGIBLE  
TELECOMMUNICATIONS CARRIER SERVICE AREA**

**I. INTRODUCTION**

Global Connection Inc. of America d/b/a Stand Up Wireless (“Stand Up Wireless” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Arizona Corporation Commission (“Commission”), hereby files this application to expand Stand Up Wireless’ Eligible Telecommunications Carrier (“ETC”) service area in the State of Arizona (“Application”). Stand Up Wireless was designated as a Lifeline-only ETC by Commission Order (“ETC Designation Order”) on October 17, 2012.

**II. DESIGNATED SERVICE AREA**

In the ETC Designation Order, the Commission designated Stand Up Wireless as an ETC in certain zip codes, excluding tribal lands, set forth in Attachment 1 attached thereto. Stand Up Wireless has since become aware that there are additional zip codes where its underlying carriers, Sprint Nextel (“Sprint”) and Verizon Wireless (“Verizon”) have sufficient (i.e. greater

---

<sup>1</sup> 47 U.S.C. § 214(e)(2)

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

than 60 per cent) or substantial coverage. Stand Up Wireless performed an analysis comparing Sprint and Verizon's coverage with areas where Stand Up Wireless is not currently designated as an ETC. Stand Up Wireless hereby requests ETC designation in the resulting zip codes, identified in Exhibit 2 attached hereto. For those zip codes that encompass tribal lands, Stand Up Wireless requests to serve only the non-tribal areas of the zip code.

### **III. STAND UP WIRELESS MEETS APPLICABLE COMMISSION REQUIREMENTS**

FCC rules 47 C.F.R. §§ 54.201-54.202 (the "FCC ETC Rules") set forth the information that must be contained in a petition for designation as an ETC. In its initial Application for Designation as an Eligible Telecommunications Carrier, ("ETC Application") filed in this docket, Stand Up Wireless provided all of the information required by FCC ETC Rules.<sup>3</sup> Stand Up Wireless incorporates those filings herein. The Commission found in its ETC Designation Order that Stand Up Wireless met the requirements for designation as an ETC. Furthermore, Stand Up Wireless has complied with the conditions of its ETC designation and will continue to do so.

### **IV. PUBLIC INTEREST BENEFITS**

In its ETC Designation Order, the Commission found that designation of Stand Up Wireless as an ETC would serve the public interest. Stand Up Wireless' prepaid wireless plans enable consumers to enjoy the benefits of wireless telecommunication without being subject to extensive credit reviews and long-term service commitments, which historically have prevented many low-income Americans, including many Arizona residents, from reaping the full benefits of the intensely competitive wireless market. Stand Up Wireless' Lifeline offerings compare

---

<sup>3</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

favorably with those of other competitive ETCs. Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing Stand Up Wireless with the authority necessary to offer discounted Lifeline services to eligible residents in additional areas of Georgia where its underlying carriers have sufficient coverage undoubtedly promotes the public interest.

## **V. CONCLUSION**

Stand Up Wireless submits that the information contained herein, together with the Company's initial ETC Application, which information is incorporated herein by this reference, demonstrates that Stand Up Wireless meets the requirements for ETC designation and that designation of Stand Up Wireless as an ETC in the proposed additional service areas in Arizona will serve the public interest.

WHEREFORE, Stand Up Wireless respectfully requests that the Commission promptly grant this Application and expand Stand Up Wireless' Lifeline-only ETC designation to include the additional service areas requested herein.

Respectfully submitted,



---

Kasey Chow, Esq.  
Lance J.M. Steinhart, P.C.  
Attorneys at Law  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200 (Phone)  
(770) 232-9208 (Fax)  
E-Mail: [kchow@telecomcounsel.com](mailto:kchow@telecomcounsel.com)

*Attorneys for Global Connection Inc. of America  
d/b/a Stand Up Wireless*

September 9, 2014

**EXHIBIT 1**

**Certification**

State of Georgia )  
 )  
County of Gwinnett )

Certification

Personally appeared before the undersigned, an officer duly authorized to administer oaths, I, Dave Skogen, first being duly sworn, depose and state that I am the Chief Executive Officer of Global Connection Inc. of America dba STAND UP WIRELESS, Applicant in this Application, and have read the same and knows the contents thereof, and confirm that the statements made herein are true and correct to the best of and within my personal knowledge.

Dated: 9-8-14

*Dave Skogen*

\_\_\_\_\_  
Dave Skogen, Chief Executive Officer  
Global Connection Inc. of America  
dba STAND UP WIRELESS

Subscribed and sworn to before me this 8<sup>th</sup> day of September 2014.



*M Bush*

\_\_\_\_\_  
(Signature of person authorized to administer oath)

My commission expires: 06/4/2018

**EXHIBIT 2**

**Proposed Additional Service Areas**

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
<b>ADDITIONAL</b>			
85039	PHOENIX	AZ	
85073	PHOENIX	AZ	
85077	PHOENIX	AZ	
85235	HAYDEN	AZ	
85237	KEARNY	AZ	
85256	SCOTTSDALE	AZ	
85262	SCOTTSDALE	AZ	
85264	FORT MCDOWELL	AZ	
85273	SUPERIOR	AZ	
85279	FLORENCE	AZ	
85289	TEMPE	AZ	
85290	TORTILLA FLAT	AZ	
85292	WINKELMAN	AZ	
85313	GLENDALE	AZ	
85320	AGUILA	AZ	
85321	AJO	AZ	
85324	BLACK CANYON CITY	AZ	
85325	BOUSE	AZ	
85332	CONGRESS	AZ	
85341	LUKEVILLE	AZ	
85344	PARKER	AZ	
85347	ROLL	AZ	
85348	SALOME	AZ	
85356	WELLTON	AZ	
85357	WENDEN	AZ	
85362	YARNELL	AZ	
85371	POSTON	AZ	
85390	WICKENBURG	AZ	
85501	GLOBE	AZ	
85530	BYLAS	AZ	
85531	CENTRAL	AZ	
85533	CLIFTON	AZ	
85534	DUNCAN	AZ	
85535	EDEN	AZ	
85536	FORT THOMAS	AZ	
85539	MIAMI	AZ	
85540	MORENCI	AZ	
85541	PAYSON	AZ	
85542	PERIDOT	AZ	
85543	PIMA	AZ	
85544	PINE	AZ	
85545	ROOSEVELT	AZ	
85546	SAFFORD	AZ	
85548	SAFFORD	AZ	
85550	SAN CARLOS	AZ	
85551	SOLOMON	AZ	
85552	THATCHER	AZ	
85554	YOUNG	AZ	
85601	ARIVACA	AZ	
85602	BENSON	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
85607	DOUGLAS	AZ	
85610	ELFRIDA	AZ	
85611	ELGIN	AZ	
85615	HEREFORD	AZ	
85621	NOGALES	AZ	
85624	PATAGONIA	AZ	
85625	PEARCE	AZ	
85633	SASABE	AZ	
85634	SELLS	AZ	
85637	SONOITA	AZ	
85638	TOMBSTONE	AZ	
85639	TOPAWA	AZ	
85643	WILLCOX	AZ	
85671	SIERRA VISTA	AZ	
85720	TUCSON	AZ	
85736	TUCSON	AZ	
85775	TUCSON	AZ	
85777	TUCSON	AZ	
85901	SHOW LOW	AZ	
85902	SHOW LOW	AZ	
85911	CIBECUE	AZ	
85912	WHITE MOUNTAIN LAKE	AZ	
85920	ALPINE	AZ	
85922	BLUE	AZ	
85923	CLAY SPRINGS	AZ	
85924	CONCHO	AZ	
85925	EAGAR	AZ	
85926	FORT APACHE	AZ	
85927	GREER	AZ	
85928	HEBER	AZ	
85929	LAKESIDE	AZ	
85930	M McNARY	AZ	
85931	FOREST LAKES	AZ	
85932	NUTRIOSO	AZ	
85933	OVERGAARD	AZ	
85934	PINEDALE	AZ	
85935	PINETOP	AZ	
85936	SAINT JOHNS	AZ	
85937	SNOWFLAKE	AZ	
85938	SPRINGERVILLE	AZ	
85939	TAYLOR	AZ	
85940	VERNON	AZ	
85941	WHITERIVER	AZ	
86001	FLAGSTAFF	AZ	
86016	GRAY MOUNTAIN	AZ	
86020	CAMERON	AZ	
86021	COLORADO CITY	AZ	
86022	FREDONIA	AZ	
86024	HAPPY JACK	AZ	
86030	HOTEVILLA	AZ	
86031	INDIAN WELLS	AZ	

Zipcode	Zip_Postal_City	State	Tribal Lands Covered
86033	KAYENTA	AZ	
86034	KEAMS CANYON	AZ	
86035	LEUPP	AZ	
86036	MARBLE CANYON	AZ	
86038	MORMON LAKE	AZ	
86039	KYKOTSMOVI VILLAGE	AZ	
86040	PAGE	AZ	
86042	POLACCA	AZ	
86043	SECOND MESA	AZ	
86044	TONALEA	AZ	
86045	TUBA CITY	AZ	
86046	WILLIAMS	AZ	
86047	WINSLOW	AZ	
86052	NORTH RIM	AZ	
86053	KAIBETO	AZ	
86054	SHONTO	AZ	
86303	PRESCOTT	AZ	
86305	PRESCOTT	AZ	
86321	BAGDAD	AZ	
86323	CHINO VALLEY	AZ	
86324	CLARKDALE	AZ	
86332	KIRKLAND	AZ	
86334	PAULDEN	AZ	
86336	SEDONA	AZ	
86337	SELIGMAN	AZ	
86338	SKULL VALLEY	AZ	
86343	CROWN KING	AZ	
86401	KINGMAN	AZ	
86406	LAKE HAVASU CITY	AZ	
86411	HACKBERRY	AZ	
86432	LITTLEFIELD	AZ	
86433	OATMAN	AZ	
86434	PEACH SPRINGS	AZ	
86435	SUPAI	AZ	
86437	VALENTINE	AZ	
86441	DOLAN SPRINGS	AZ	
86442	BULLHEAD CITY	AZ	
86443	TEMPLE BAR MARINA	AZ	
86444	MEADVIEW	AZ	
86445	WILLOW BEACH	AZ	
86502	CHAMBERS	AZ	
86503	CHINLE	AZ	
86504	FORT DEFIANCE	AZ	
86505	GANADO	AZ	
86507	LUKACHUKAI	AZ	
86508	LUPTON	AZ	
86510	PINON	AZ	
86514	TEEC NOS POS	AZ	
86515	WINDOW ROCK	AZ	
86520	BLUE GAP	AZ	
86535	DENNEHOTSO	AZ	

<b>Zipcode</b>	<b>Zip_Postal_City</b>	<b>State</b>	<b>Tribal Lands Covered</b>
86538	MANY FARMS	AZ	
86540	NAZLINI	AZ	
86544	RED VALLEY	AZ	
86545	ROCK POINT	AZ	
86547	ROUND ROCK	AZ	
86556	TSAILE	AZ	