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April 7, 2015

**Via Email and Regular Mail**

Luly E. Massaro, Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: *American Broadband and Telecommunications Company  
Petition for Limited Designation as an Eligible Telecommunications Carrier*

Notice: ***INCLUDES CLAIM OF PRIVILEGE***

Dear Ms. Massaro:

Enclosed for filing on behalf of American Broadband and Telecommunications Company are an original and six copies of a Petition for Limited ETC Designation, and accompanying documents. Also enclosed is a check payable to the State of Rhode Island in the amount of \$300.

As you will note, Exhibit B to the Statement of Business Operations is in an envelope marked "*Financial Information – Confidential – Do Not Release.*" It contains the petitioner's confidential financial information and is to be filed under seal pursuant to Rule 1.2(g) of the Rules of Practice and Procedure and G.L. 1956, § 38-2-2(4)(B), which exempts a business entity's confidential financial information from the Public Records Act.

Please do not hesitate to contact us should you have any questions or need further information.

Very truly,

Jeffrey Biolchini

JMB:et  
Enclosures  
cc: Jeffrey Ansted (via email)

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

In RE:

Petition of American Broadband and  
Telecommunications Company For  
Limited ETC Designation

Docket No.:

**ENTRY OF APPEARANCE**

The undersigned counsel, J. Richard Ratcliffe and Jeffrey Biolchini, hereby enter their appearances in the above-captioned matter on behalf of the Petitioner, American Broadband and Telecommunications Co.

Date: April 7, 2015

  
\_\_\_\_\_  
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Date: April 7, 2015

  
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*Attorneys for American Broadband and  
Telecommunications Company*

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

In RE:	:	
	:	
Petition of American Broadband and	:	
Telecommunications Company For	:	Docket No.:
Limited ETC Designation	:	
	:	

**AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY'S  
RIPUC RULE 1.9 STATEMENT**

Legal Name of Applicant .....American Broadband and Telecommunications Company

State of Organization ..... Delaware

Principal Place of Business..... 1 Seagate, Suite 600, Toledo, OH 43699

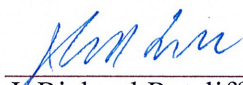
States Wherein Authorized to do Business..... Alabama, Arizona, Arkansas, California, Colorado,  
Connecticut, Delaware, the District of Columbia, Florida, Georgia, Hawaii, Illinois, Indiana,  
Kentucky, Maryland, Massachusetts, Michigan, Minnesota, Missouri, New Hampshire, New  
Mexico, Nevada, New York, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island,  
South Carolina, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, and Wisconsin

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RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of April, 2015  
Counsel for American Broadband and Telecommunications Co.

RATCLIFFE HARTEN BURKE & GALAMAGA, LLP

By

  
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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

In RE:	:	
	:	
Petition of American Broadband and	:	Docket No.:
Telecommunications Company For	:	
Limited ETC Designation	:	
	:	

**PETITION OF  
AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY  
FOR LIMITED ETC DESIGNATION**

American Broadband and Telecommunications Company (“American Broadband” or the “Company”) submits this Petition for Limited Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), Section 54.201 *et seq.* of the Rules of the Federal Communications Commission (“FCC”), Sections 42-35-1 *et seq.* and 39-2-5(9)(i) of the Rhode Island General Laws, and Section 4.0 of the Rules and Regulations Governing the Certification and Verification Procedures for Telecommunications Carriers Eligible to Receive Payments from the Federal Universal Service Fund (the “Commission Rules”).<sup>1</sup> American Broadband does not request ETC status for the purpose of receiving support from any of the other Universal Service Funds (“USF”), including high-cost and Link Up support and state USF. In support of this Petition, American Broadband provides the following information.

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<sup>1</sup> Rules and Regulations Governing the Certification and Verification Procedures for Telecommunications Carriers Eligible to Receive Payments from the Federal Universal Service Fund, effective August 30, 2012.

## **I. OVERVIEW OF PETITIONER AND SERVICE OFFERINGS.**

American Broadband is a Delaware corporation with principal offices at One Seagate, Toledo, Ohio 43604. The Company is registered with the Rhode Island Secretary of State as a foreign limited liability company operating in Rhode Island, effective February 9, 2015,<sup>2</sup> and is filling concurrently an application for certification as an authorized telecommunications carrier under the laws of the State of Rhode Island pursuant to section 4.1 of the Commission Rules. American Broadband does not presently provide service to customers in Rhode Island.

American Broadband currently operates as a common carrier, providing wireless mobile phone services to consumers in Georgia, Illinois, Indiana, Kentucky, Maryland, Michigan, Missouri, New York, Ohio, Pennsylvania, West Virginia and Wisconsin, and plans to operate as a common carrier in many other states, including Rhode Island. It is already designated as an ETC in Illinois, Indiana, Kentucky, Maryland, Michigan, Minnesota, Missouri, Ohio, West Virginia, and Wisconsin, and has applications pending in Alabama,<sup>3</sup> California, Connecticut,<sup>2</sup> Delaware,<sup>2</sup> the District of Columbia,<sup>2</sup> Florida,<sup>2</sup> New Hampshire,<sup>2</sup> New York,<sup>2</sup> North Carolina,<sup>2</sup> Pennsylvania, Tennessee,<sup>2</sup> Texas,<sup>2</sup> Utah, and Virginia.<sup>2</sup> None of the Company's petitions for ETC designation have been denied.

As a reseller of wireless services, American Broadband will purchase wireless network infrastructure and wireless transmission facilities from T-Mobile USA ("T-Mobile"), and SprintCom Wireless and Nextel West Corp. (jointly "Sprint").<sup>4</sup> The Company's products and plans will be specially geared toward serving lower income communities. Its prepaid, budget-friendly pricing will give many low-income consumers the option of having basic mobile phone

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<sup>2</sup> See Exhibit A.

<sup>3</sup> American Broadband's petition for these states are pending with the FCC.

<sup>4</sup> American Broadband will purchase the services of Sprint and T-Mobile through an intermediary such as Prepaid Wireless Group.

service without the burden of hidden costs, varying monthly charges, or contractual commitments, and customers will be able to customize and supplement their service to suit their needs with American Broadband's available bundles of minutes and text packages. By providing affordable service without credit checks, deposits or contractual commitments, American Broadband can reach out to those who are often ignored by traditional carriers and contribute to the expansion of mobile wireless services for low-income consumers in Rhode Island.

## **II. AMERICAN BROADBAND SATISFIES THE COMMISSION'S AND THE FCC'S REQUIREMENTS FOR ETC DESIGNATION.**

Per the Commission Rules, § 4.0, petitioners seeking ETC designation in Rhode Island are largely evaluated under the standards set by the FCC.<sup>5</sup> Section 214(e)(2) of the Act provides that, upon request and consistent with the public interest, convenience and necessity, the Commission may designate more than one common carrier as an ETC in areas served by a rural telephone company and shall do so with respect to all other areas, provided that the requesting carrier (i) offers services that are supported by federal universal service support mechanisms and (ii) advertises the availability of such services.<sup>6</sup> FCC and Commission rules impose additional requirements on a carrier requesting ETC designation. As demonstrated below, American Broadband satisfies each of these requirements.

### **1. American Broadband Will Operate as a Common Carrier throughout Rhode Island.**

American Broadband will operate as a common carrier as defined in 47 U.S.C. § 153(11) in Rhode Island and seeks certification as an ETC in the geographic service areas throughout this

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<sup>5</sup> See Commission Rules, § 4.0.

<sup>6</sup> See 47 U.S.C. § 214(e)(2); *see also* 47 C.F.R. § 54.201(d).

state where its underlying carriers, Sprint and T-Mobile, provide coverage.<sup>7</sup> The FCC has consistently held that providers of wireless services are to be treated as common carriers for regulatory purposes. Moreover, American Broadband is a CMRS provider, and section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers.<sup>8</sup> A list of the associated exchanges / wire centers the Company proposes to include as its service area is appended as Exhibit C.

**2. American Broadband Will Provide the Services Designated for Lifeline Support as Required by 54 C.F.R. § 54.101.**

The FCC has determined that “voice telephony services” shall be supported by the federal USF program.<sup>9</sup> Eligible voice telephony services must provide:

- voice grade access to the public switched network;
- local usage;
- access to emergency services; and
- toll limitation for qualifying low-income consumers.

Upon receiving the requested designation as an ETC, American Broadband will provide each of these required services throughout its designated service area, as more fully described below.

*A. Voice Grade Access.*

The FCC has stated that voice-grade access consists of the ability for a user to make and receive telephone calls within a specified bandwidth.<sup>10</sup> American Broadband will provide this

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<sup>7</sup> Consistent with FCC holdings, there is no need for a “creamskimming” analysis in connection with American Broadband’s Petition because the Company is seeking ETC designation only for purposes of receiving federal low-income support. *See, e.g., Virgin Mobile USA, L.P.*, Order, 24 FCC Rcd 3381, ¶ 39 n. 101 (2009).

<sup>8</sup> *See* 47 U.S.C. § 332(c)(1)(A).

<sup>9</sup> 47 C.F.R. § 54.101(a).; *see also* Commission Rules § 4.2 (requiring petitioners to “[d]emonstrate that the carrier will provide Voice Telephony services that meet each part of ‘Services designated for support’ set forth in 47 C.F.R. § 54.101”).

<sup>10</sup> *See Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997).



service via resale of T-Mobile and Sprint mobile services to low-income customers in its designated service area.

*B. Local Usage.*

An ETC applicant is no longer required to demonstrate that its proposed local usage plan is comparable to the plan offered by the incumbent local exchange carrier (“ILEC”) in the same designated service area.<sup>11</sup> Like most wireless carriers, American Broadband does not distinguish between local and long distance usage. Rather, American Broadband satisfies the interest of the former Local Usage requirement by offering local usage service via bundled local and long distance minutes. The details of American Broadband’s service plans are set forth in detail at paragraph 3E of this Petition.

*C. Access to emergency services.*

Pursuant to the FCC’s rules and section 4.4.1.1 of the Commission’s Rules, the Company will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. In addition, American Broadband will comply with any FCC or Commission requirements regarding customer access to 911 and E911 services as well as the provision of E911-compatible handsets, specifically including those obligations imposed as part of the FCC’s forbearance grant conditions.

*D. Toll limitation for qualifying low-income consumers.*

American Broadband will not provide toll limitation service (“TLS”). Like most wireless carriers, American Broadband does not differentiate domestic long distance usage from local

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<sup>11</sup> *Lifeline Reform Order*, ¶ 49. .

usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such “all-distance” services are not considered to have voluntarily elected to receive TLS.<sup>12</sup> If, in the future, American Broadband should offer a Lifeline service which differentiates between local usage and long distance usage, the Company commits to provide TLS to customers of that service.

**3. American Broadband Will Comply with the Commission’s and the FCC’s Additional Obligations per 54 C.F.R. § 54.202.**

In compliance with section 4.3 of the Commission Rules and the requirements of 54 C.F.R. § 54.202, American Broadband certifies as follows that it has the financial and technical ability to perform, remain functional, and satisfy applicable consumer protection standards while offering the service plans described herein.

*A. American Broadband certifies that it will comply with the applicable FCC service requirements.*

Per the requirements of 47 C.F.R. § 54.202(a)(1)(i), American Broadband certifies that it will comply with the service requirements applicable to the low-income support it receives as a result of designation as an ETC for the purposes of receiving Lifeline.

*B. American Broadband has the ability to remain functional in emergency situations.*<sup>13</sup>

American Broadband’s Lifeline services will remain functional in emergency situations. As discussed herein, American Broadband will utilize the extensive and well-established Sprint and T-Mobile networks and facilities to provide American Broadband’s mobile services. The Company understands that the Sprint and T-Mobile networks are capable of managing traffic spikes that may occur during emergency situations and can reroute traffic in the event of

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<sup>12</sup> See *Lifeline Reform Order*, ¶ 230.

<sup>13</sup> See, e.g., 47 C.F.R. § 54.202(a)(2).

damaged facilities. American Broadband also understands that each carrier has sufficient back-up power to ensure functionality if its external power supply becomes unavailable. Indeed, both companies have repeatedly certified to the FCC that their networks function in emergency situations.<sup>14</sup> Sprint and T-Mobile will provide the same functionality to American Broadband and American Broadband's customers.

*C. American Broadband will satisfy applicable consumer protection and service quality standards.*

The FCC's rules require the petitioner to demonstrate that it satisfies applicable consumer protection and service quality standards. A wireless petitioner's commitment to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") satisfies this requirement. American Broadband commits to comply with the CTIA Consumer Code to ensure that the Company offers its subscribers the highest level of protection and quality service. The Company will make every effort to resolve expeditiously complaints received by the Commission and will designate a specific contact person to work with Commission staff to resolve any complaints or other compliance issues.

*D. American Broadband is financially and technically capable of providing Lifeline services in compliance with the FCC's rules.*

The FCC's rules, as revised,<sup>15</sup> and section 4.4.1.3 of the Commission's Rules require ETC petitioners to demonstrate financial and technical capability to comply with the FCC's Lifeline service requirements.<sup>16</sup> Among the factors to be considered are: a carrier's prior

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<sup>14</sup> See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

<sup>15</sup> See, e.g., revised 47 C.F.R. § 54.202(a)(4).

<sup>16</sup> See *Lifeline Reform Order*, ¶¶ 387-388 (revising 47 C.F.R. § 54.202(a)(4)).

offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate, whether the carrier receives revenues from other sources, and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding.

American Broadband receives revenue from a number of sources which are completely independent from the revenue it will receive in the form of Lifeline reimbursements. Its revenue stream includes income from the sale of non-lifeline prepaid and postpaid telecommunications services to customers in Illinois, Indiana, Kentucky, Michigan, Ohio, New York, Pennsylvania and Wisconsin. In addition, American Broadband has provided non-Lifeline prepaid domestic telecommunications since 2004 and has a substantial non-Lifeline customer base. American Broadband receives revenues from these non-Lifeline retail offerings. Consequently, American Broadband will not be relying exclusively on Lifeline reimbursement for its operating revenues. In addition, the Company has not been subject to ETC enforcement sanctions or revocation proceedings in any state.

*E. American Broadband Will Offer Lifeline Subscribers Service Plans Containing the Following Terms and Conditions.*

American Broadband will offer Lifeline subscribers service plans under its “American Assistance” label. American Assistance will be available through several different Lifeline service packages in Rhode Island, including: (1) a 250 voice minutes per month plan at no charge to Lifeline-eligible consumers (after application of the Lifeline subsidy); (2) a 500 voice minutes per month plan for voice calls at a low monthly rate to Lifeline-eligible consumers (after application of the Lifeline subsidy); (3) the ability to apply the \$9.25 Lifeline credit to the Company’s non-Lifeline packages (one of which is a plan with unlimited minutes of voice telephone and text messages at a low monthly rate); and (4) an unlimited voice minutes per

month plan at no charge to qualified residents of Tribal lands, with 1,000 texts per month. The plans offered by American Broadband do not offer roll over voice minutes or roll over text messages, month to month.

In the 250 voice minutes per month plan, qualified applicants in Rhode Island will be eligible to receive the following at no charge: a free cell phone, 250 monthly talk minutes, and 250 text messages per month. In addition, this plan offers access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline telephone numbers and addresses, and no annual contracts or monthly bills. This plan will be available throughout American Broadband's service area except in Tribal lands.

The 500 minutes per month plan differs from the above only in that it offers twice the number of monthly talk minutes and text messages, that is 500 monthly talk minutes of voice and 500 text messages, but for a monthly charge of \$10.70 (after application of the \$9.25 Lifeline credit to the non-Lifeline rate of \$19.95). The same service features and limitations apply, such as 911 access, free voice mail, no Tribal lands availability, etc.

The Tribal Resident plan will provide a monthly package of unlimited minutes of anytime, local and domestic long distance voice calling and 1,000 text messages per month at no cost to the subscriber after application of the \$34.25 Lifeline credit. Like subscribers to American Broadband's non-Tribal Lifeline plans, qualified residents of Tribal lands will receive access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline telephone numbers and addresses, and are not subject to annual contracts. Residents of Tribal lands may add a data/picture package to the plan at an additional cost of \$15.00 a month. This plan is available only to qualified residents of Tribal lands.

In addition to the foregoing, if granted ETC status in Rhode Island, American Broadband will offer Lifeline eligible customers the identical packages that the Company intends to offer to its Rhode Island non-Lifeline customers throughout its proposed service area, including an unlimited voice and unlimited texting plan. These plans include the following:

<b><u>Plan – Prepaid</u></b>	<b><u>Price Per Month</u></b>
<b>Unlimited Voice/Text and 1 GB Data</b>	<b>\$49.95</b>
<b>1500 Minute Talk/1500 Text</b>	<b>\$29.95</b>
<b>1000 Texts and 250 Talk Minutes</b>	<b>\$19.95</b>
<b>4000 Combined Voice Minutes and Text</b>	<b>\$34.25</b>

American Broadband will apply the \$9.25 Lifeline credit to the non-Lifeline rate listed above for these plans. As with the Lifeline plans, all of these plans offer access to 911, free voicemail, caller ID and call waiting, free access to operator service and directory listings for publicly listed, domestic, landline telephone numbers and addresses, and no annual contracts.

American Assistance also allows customers to add minutes and texts to their plan as needed, including the following:

100 Talk	100 Talk Minutes	\$6.99
250 Talk and Text	250 Talk Minutes + 250 Text Messages	\$9.99
500 Talk and Text	500 Talk Minutes + 500 Text Messages	\$19.99
1,000 Talk and Text	1,000 Talk Minutes + 1,000 Text Messages	\$29.99
100 Text	100 Text Messages	\$2.99
300 Text	300 Text Messages	\$4.99
500 Text	500 Text Messages	\$7.99
1,000 Text	1,000 Text Messages	\$12.99

These supplemental packages, or “top-up” minutes, will be available for purchase at American Broadband’s website and at its retail locations.

American Broadband’s terms and conditions for services for all plans are included on its website at [www.americanassistance.com/program/](http://www.americanassistance.com/program/). All plans will include nationwide domestic long-distance at no extra per-minute charge, as well as caller ID, voice mail, call waiting and three-way calling. With these plans, emergency (911) calls will be free, regardless of service activation or availability of minutes, and will not count against the customer’s airtime. And, as stated above, the plans will include free customer service (611) (with no usage or fees charged), and no fee directory assistance calls (411); however, 411 calls will count as airtime minutes of usage.

**4. American Broadband Will Offer Service by Resale of Another’s Carrier’s Services and Comply with All Forbearance Conditions.**

American Broadband will provide Lifeline service via resale of underlying carrier services provided by T-Mobile and Sprint. Section 214(e)(1)(A) of the Act, as well as Section 4.4 of the Commission Rules, provides that an ETC must provide services “using its own facilities or a combination of its own facilities and resale of another carrier’s services.”<sup>17</sup> However, pursuant to the FCC’s *Lifeline Reform Order*, resellers are granted blanket forbearance from this facilities requirement, subject to conditions, in connection with limited ETC designation to participate in the Lifeline program.<sup>18</sup> These conditions include providing 911 and E911 service regardless of activation status and prepaid minutes available, providing E911-

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<sup>17</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>18</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, 27 FCC Rcd 6656, ¶ 368 (2012) (“*Lifeline Reform Order*”).

compliant handsets, and replacing E911 non-compliant handsets at no charge to the Lifeline customer.<sup>19</sup> In addition, the reseller must adhere to an FCC-approved compliance plan that includes specific information about the reseller's service offerings and that outlines the measures that the reseller will take to implement the obligations established in the *Lifeline Reform Order*.<sup>20</sup>

American Broadband commits to compliance with all of these conditions. To this end, and consistent with section 4.4.1.2 of the Commission Rules, American Broadband has submitted to the FCC a compliance plan that meets the requirements of the *Lifeline Reform Order*. On May 25, 2012, the FCC approved the plan; therefore, American Broadband is not required to meet the "own facilities" requirement of Section 214(e)(1)(A). Consequently, the Company's proposal to operate as an ETC in Rhode Island using resold services is entirely compliant with FCC requirements, and American Broadband respectfully requests a waiver of the requirements of section 4.4.

**5. A Copy of American Broadband's Compliance Plan is Enclosed.**

To confirm that it meets section 4.5 of the Commission Rules and the criteria set forth in Subpart E of 47 C.F.R. Part 54, a copy of American Broadband's Lifeline Compliance Plan is enclosed as Exhibit B.

**6. A Copy of American Broadband's Marketing Materials is Enclosed.**

As required by section 4.6 of the Commission Rules, American Broadband's Compliance Plan contains an example of the type of advertising materials that American Broadband intends to use in Rhode Island. As this material demonstrates, the Company will advertise its services and charges using media of general distribution and in a manner reasonably designed to reach Lifeline-eligible consumers in full compliance with sections 54.201(d)(2) and 54.405(b) of the

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<sup>19</sup> See *id.*, at ¶ 373.

<sup>20</sup> See *id.*, at ¶ 368.



FCC's Rules.<sup>21</sup> Moreover, American Broadband will expand its advertising efforts as necessary to ensure that Lifeline-eligible customers are aware of the Company's service offerings.<sup>22</sup>

In its advertising efforts, American Broadband will comply with the FCC's revised rules regarding information to be included in marketing materials, including FCC revised rule section 54.405(c). Specifically, American Broadband's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) American Broadband is the provider of the services.

**7. A Copy of American Broadband's Rhode Island-Specific Enrollment Form/Certification is Enclosed.**

Enclosed as Exhibit D is a copy of the enrollment form that American Broadband will use to qualify and enroll Lifeline subscribers in Rhode Island. This Rhode Island-specific form includes the criteria set forth in G.L. 1956, § 39-2-5(9)(i). Each Rhode Island Lifeline customer will receive this application and its disclosures, and be required to supply the information and certifications requested therein. Moreover, as shown, American Broadband's Lifeline application/certification form<sup>23</sup> will state that Lifeline is a federal benefit and 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.

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<sup>21</sup> See 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. §§ 54.201(d)(2), 54.405(b).

<sup>22</sup> See 47 C.F.R. § 54.405(b).

<sup>23</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, Erratum, ¶ 63 (rel. May 16, 2012).

**8. American Broadband Will Comply with FCC Requirements for Certification and Verification.**

American Broadband is aware of the FCC's and the Commission's current requirements regarding certification and verification of a customer's qualification for Lifeline service and has implemented procedures to ensure these requirements are met. As described in American Broadband's Compliance Plan, the Company has detailed and comprehensive procedures to address customer certification and verification requirements, as well as requirements concerning de-enrollment and duplication of service.

Specifically, American Broadband has the following Checklist in place to make sure that a potential subscriber's eligibility determination takes place prior to activating Lifeline service for a consumer:

- Assure that the consumer is not an existing American Broadband customer;
- Assure that the consumer is not receiving a Lifeline benefit from another company through the NLAD Database;
- Confirm that there is not a duplicate address in existence in the American Broadband active customer database;
- Send a non-activated handset to qualified addresses only; and
- Require the consumer to activate the phone prior to receiving any Lifeline service.

American Broadband further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income consumer pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410(a),

54.404-54.405. These procedures comply with the FCC's revised customer certification and verification requirements.<sup>24</sup>

American Broadband also will comply with both the FCC's annual certification and reporting requirements and the FCC's measures to prevent waste, fraud and abuse of Lifeline services.<sup>25</sup> In particular, Section IV.A. of American Broadband's Compliance Plan discusses steps that the Company will take to ensure activation of service and to implement de-enrollment in the event of inactivity for a period of 60 days.

**9. American Broadband Will Comply with All Commission and FCC Requirements for Fees, Charges, and Reports.**

American Broadband will comply with all applicable Commission and FCC requirements with respect to fees, charges, and reports. The Company will not collect service deposits for its plans and will not charge a number-portability fee for Lifeline accounts.<sup>26</sup> American Broadband will timely pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees. Furthermore, American Broadband will comply with the FCC's annual reporting requirements for ETCs as set forth in Section 54.422 of the FCC's Rules,<sup>27</sup> and with the Commission Rules.

**10. American Broadband will comply with Commission and FCC requirements on relinquishment of ETC designation.**

If at some point in the future, American Broadband seeks to relinquish its ETC designation, American Broadband will comply with the requirements of 47 C.F.R. § 54.205.

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<sup>24</sup> See 47 C.F.R. §§ 54.410.

<sup>25</sup> See 47 C.F.R. §§ 54.416, 54.422; *See also In re: Telecommunications Carriers Eligible for Universal Service Support; Virgin Mobile USA, L.P. Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, et al.*, 25 FCC Rcd 17797, ¶ 24 (2010).

<sup>26</sup> See 47 C.F.R. § 54.401(c), (e).

<sup>27</sup> See 47 C.F.R. § 54.422.

#### **11. Anti-Drug Abuse Certification.**

American Broadband certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

#### **III. DESIGNATED CONTACT INFORMATION.**

The legal name, address and telephone number of the Company and its designated contact person for the purposes of this Application is:

American Broadband and Telecommunications Company  
One Seagate  
Toledo, Ohio 43604  
(419) 824-5810  
(419) 205-9014  
E-mail: JAnsted@ambt.net  
Designated contact person: Jeffrey Ansted, President

The contact information for the Company's attorneys is as follows:

Henry T. Kelly	J. Richard Ratcliffe
Michael R. Dover	Jeffrey Biolchini
Kelley Drye & Warren LLP	Ratcliffe Harten Burke & Galamaga, LLP
333 West Wacker Drive, 26 <sup>th</sup> Floor	40 Westminster Street, Suite 700
Chicago, IL 60606	Providence, RI 02903
(312) 857-7070	(401) 331-3400
hkelly@kelleydrye.com	rratcliffe@rhbglaw.com
mdover@kelleydrye.com	jbiolchini@rhbglaw.com

#### **IV. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST.**

Designation of American Broadband as an ETC for Lifeline purposes will further the Commission's universal service goals and thus benefit Rhode Island low-income consumers. Specifically, the designation will provide a valuable service that will facilitate communications between low-income consumers and their work and family at low or no cost, increase consumer choice, and increase competition.

Like all Rhode Island consumers, low-income consumers in Rhode Island have communication needs, but face difficult choices about how to allocate and spend their limited

resources, while simultaneously obtaining the services they need to satisfy the demands of work and family. The ability to meet these demands while at the same time anticipating and controlling costs is critical. American Broadband's prepaid service and supplemental mobile phone plans enable customers to do just that, to tailor their wireless services to their needs and budgets. Moreover, the prepaid nature of the service renders it an option for "unbanked" consumers, and American Broadband will not impose credit checks thereby providing an alternative for those low-income consumers unable to obtain credit for post-paid services provided by traditional carriers.

Beyond the budgetary advantages, the grant of American Broadband's Petition will provide consumers with access to high quality plans and the benefits of mobile service.<sup>28</sup> Through American Broadband's prepaid mobile calling service packages, low-income consumers will be able to obtain a generous number of included, low-cost, anytime minutes, as well as free Caller ID, Call Waiting, Call Forwarding, Basic Voicemail, and calls to 911 services, all with no hidden costs, varying monthly charges or long term contract issues. These free services and low-cost minutes are an invaluable resource for cash-strapped consumers, whether their needs relate to seeking employment or the ability to stay in touch with children and family. Moreover, the mobility of the service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or work in migratory jobs. Where traditional landline service would be unavailable or not a viable option, wireless service offers a stable method of contact.

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<sup>28</sup> As discussed above, American Broadband will comply with the Consumer Code for Wireless Service of CTIA – The Wireless Association, and applicable Rhode Island consumer protection and service quality standards.

Finally, by increasing customer choice, designation of American Broadband will spur other wireless ETCs to compete for eligible customers by providing the greater value (e.g., higher quality handsets, superior customer service). This competition in turn could spur other service providers to improve their service options, as consumers will gravitate to the carriers providing the best value at the lowest cost. For all of these reasons, designation of American Broadband is consistent with the Commission's goal of universal service and is in the public interest.

## **V. CONCLUSION**

American Broadband respectfully requests that the Commission expeditiously issue an order designating the Company as an ETC in Rhode Island throughout the service area specified above for the purpose of receiving federal support and reimbursement for provision of low-income communications services on a wireless basis to qualified low-income customers.

### **AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY**

Date: April 7, 2015

By: 

J. Richard Ratcliffe, #2603  
Jeffrey Biolchini, #7320  
Ratcliffe Harten Burke & Galamaga, LLP  
40 Westminster Street, Suite 700  
Providence, RI 02903  
Tel: (401) 331-3400  
rratcliffe@rhbglaw.com  
jbiolchini@rhbglaw.com

*Attorneys for American Broadband and  
Telecommunications Company*

## VERIFICATION

STATE OF OHIO                     )  
   ) ss.  
County of                           )

I, Jeffrey Ansted, being first duly sworn upon oath, depose and say that I am the President of American Broadband and Telecommunications Company, and as such am authorized to make this verification on its behalf; that I have read the foregoing Petition; that I know the contents thereof; and that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief.

Subscribed and sworn to before me this 26<sup>th</sup> day of February 2015.

  
Notary Public



KATHLEEN K. YOAKAM  
NOTARY PUBLIC - OHIO  
MY COMMISSION EXPIRES 05-07-2018

My Commission expires: 5-07-18

## **Exhibit A**

American Broadband and Telecommunications Company  
Foreign Entity Registration



Filing and License Fee: \$310.00 minimum



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Office of the Secretary of State  
Division of Business Services  
148 W. River Street  
Providence, Rhode Island 02904-2615

BUSINESS CORPORATION

APPLICATION FOR CERTIFICATE OF AUTHORITY

RECEIVED  
SECRETARY OF STATE  
CORPORATIONS DIV  
2015 FEB -9 PM 3:49

Pursuant to the provisions of Section 7-1.2-1405 of the General Laws of Rhode Island, 1956, as amended, the undersigned foreign corporation hereby applies for a Certificate of Authority to transact business in the State of Rhode Island, and for that purpose submits the following statement:

1. The name of the corporation is American Broadband and Telecommunications Company
2. It is incorporated under the laws of Delaware
3. The name, if different, which it elects to use in Rhode Island is:

(a) If the name of the corporation in its jurisdiction of incorporation does not contain the word "corporation", "company", "incorporated", or "limited" or an abbreviation thereof, then list the name of the corporation with the addition of one of the above corporate endings for use in Rhode Island:

(b) If the corporate name is not available in Rhode Island, then set forth below the fictitious name under which the corporation will qualify and transact business in Rhode Island as stated in the "Fictitious Business Name Statement" to be filed with this application:

4. The date of its incorporation is July 30, 2007 and the period of its duration is perpetual
5. The address of its principal office is 1 Seagate, Suite 600, Toledo, Ohio 43699
6. The address of its proposed registered office in Rhode Island is 450 Veterans Memorial Parkway, Suite 7A.

(Street Address, not P.O. Box)

East Providence

RI 02914

(City/Town)

(Zip Code)

and the name of its proposed registered agent in Rhode Island at

that address is C T Corporation System

(Name of Agent)

7. The purpose or purposes which it proposes to pursue in the transaction of business in Rhode Island are:  
to service residential and small business customers with data and local and long distance telecommunications services
8. (a) The names and respective addresses of its directors (optional unless directors are required under the laws of the state or country of which it is incorporated).

	<u>Name</u>	<u>Address</u>
Director	<u>Jeff Ansted</u>	<u>1 Seagate, Suite 600, Toledo, Ohio 43699</u>
Director	<u>Robert Pruger</u>	<u>1 Seagate, Suite 600, Toledo, Ohio 43699</u>
Director	<u>Mike Rouen</u>	<u>1 Seagate, Suite 600, Toledo, Ohio 43699</u>
Director		

FILED

FEB 09 2015

Form No. 150  
Revised: 06/11

BY CM 241895 3:49

(b) The names and respective addresses of its principal officers (mandatory if directors are not required under the laws of the state or country of which it is incorporated).

	<u>Name</u>	<u>Address</u>
President	Jeff Ansted	1 Seagate, Suite 600, Toledo, Ohio 43699
Vice President		
Treasurer	Robert Pruger	1 Seagate, Suite 600, Toledo, Ohio 43699
Secretary	Mike Rouen	1 Seagate, Suite 600, Toledo, Ohio 43699

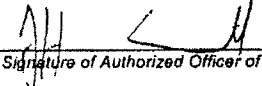
9. The aggregate number of shares which it has authority to issue; itemized by classes, par value of shares, shares without par value, and series, if any, within a class, is:

<u>Number of Shares</u>	<u>Class</u>	<u>Series</u>	<u>Par Value or Statement that Shares are without Par Value</u>
2,000,000	Common	none	\$.01

10. (a) \$ 500000 = An estimate of the value of all property to be owned by the corporation for the following year, wherever located.
- (b) \$ 0 = An estimate of the value of the corporation's property to be located within Rhode Island during the following year.
- (c) 0 % = An estimate, expressed as a percentage, of the proportion that the estimated value of the property of the corporation to be located within this state during the following year bears to the value of all property of the corporation to be owned during the following year, wherever located. (divide (b) by (a) and multiply by 100 to obtain the percentage)
11. (a) \$ 36,000,000 = An estimate of the gross amount of business to be transacted by the corporation during the following year.
- (b) \$ 50,000 = An estimate of the gross amount of business to be transacted by the corporation at or from places of business in Rhode Island during the following year.
- (c) .13 % = An estimate, expressed as a percentage, of the proportion that the gross amount of business to be transacted by the corporation at or from places of business in this state during the following year bears to the gross amount thereof which will be transacted by the corporation during the following year. (divide (b) by (a) and multiply by 100 to obtain the percentage)
12. This application is accompanied by a certificate of Good Standing issued by the proper officer of the state or country under the laws of which it is incorporated.
13. This Application for Certificate of Authority shall be effective upon filing unless a specified date is provided which shall be no later than the 90th day after the date of this filing \_\_\_\_\_.

Under penalty of perjury, I declare and affirm that I have examined this Application for Certificate of Authority, including any accompanying attachments, and that all statements contained herein are true and correct.

Date: 1/28/2015

  
 Signature of Authorized Officer of the Corporation

Jeff Ansted- President

Type or Print Name of Authorized Officer

# Delaware

PAGE 1

*The First State*

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY" IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRTIETH DAY OF JANUARY, A.D. 2015.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.

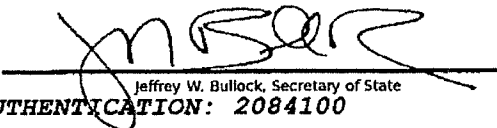
AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

4398223 8300

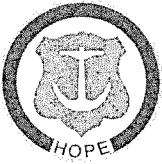
150126167

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)



  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 2084100

DATE: 01-30-15



State of Rhode Island and Providence Plantations

**Department of State | Office of the Secretary of State**

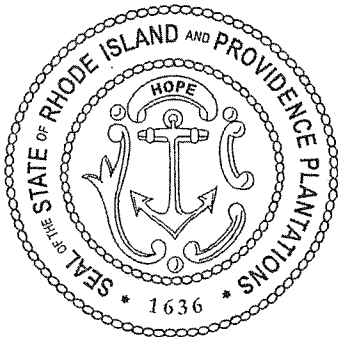
**Nellie M. Gorbea**, *Secretary of State*

I, NELLIE M. GORBEA, Secretary of State of the State of Rhode Island  
and Providence Plantations, hereby certify that this document, duly executed in  
accordance with the provisions of Title 7 of the General Laws of Rhode Island, as  
amended, has been filed in this office on this day:

February 09, 2015 3:49 PM

A handwritten signature in black ink, appearing to read "Nellie M. Gorbea".

Nellie M. Gorbea  
*Secretary of State*



## **Exhibit B**

American Broadband and Telecommunications Company

FCC Compliance Plan

(Approved May 25, 2012)



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-835-5322

DA 12-828

Release Date: May 25, 2012

## WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF AMERICAN BROADBAND & TELECOMMUNICATIONS, BUDGET PREPAY, CONSUMER CELLULAR, GLOBAL CONNECTION, TERRACOM AND TOTAL CALL

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves compliance plans of six telecommunications carriers: American Broadband & Telecommunications; Budget Prepay, Inc.; Consumer Cellular, Inc.; Global Connection, Inc. of America; TerraCom, Inc.; and Total Call Mobile, Inc. filed pursuant to the *Lifeline Reform Order* as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the provision of Lifeline service.<sup>1</sup>

The Act provides that in order to be designated as an eligible telecommunications carrier for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services . . . .”<sup>2</sup> The Commission recently amended its rules to define voice telephony as the supported service and removed directory assistance and operator services, among other things, from the list of supported services.<sup>3</sup> As a result of these amendments, many Lifeline-only ETCs that previously met the facilities requirement by relying on operator services, directory assistance or other previously supported services no longer meet the facilities requirement of the Act.<sup>4</sup> In the *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities

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<sup>1</sup> See *Lifeline and Link Up Reform and Modernization et al*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, at paras. 379-380 (rel. Feb. 6, 2012) (*Lifeline Reform Order*). A list of the compliance plans approved through this Public Notice can be found in the Appendix to this Public Notice.

<sup>2</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>3</sup> See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-93, paras. 77-78, 80 (2011) (*USF/ICC Transformation Order*); *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011); *Connect America Fund*, WC Docket No. 10-90 *et al.*, Order on Reconsideration, 26 FCC Rcd 17633, 17634-35, para. 4 (2011) (*USF/ICC Transformation Order on Reconsideration*).

<sup>4</sup> See *Lifeline Reform Order*, FCC 12-11, at para. 366, App. A; *USF/ICC Transformation Order on Reconsideration* at para. 4. Some ETCs have included language in their compliance plans indicating that they have facilities or plan to acquire facilities in the future. See, e.g., Budget PrePay, Inc. Petition for Designation as an Eligible Telecommunications Carrier, WC Docket Nos. 09-197 and 11-42, Compliance Plan of Budget PrePay, Inc. at 3 n. 6 (filed May 1, 2012). To the extent ETCs seek to avail themselves of the conditional forbearance relief established in the *Lifeline Reform Order*, we presume they lack facilities to provide the supported service under section 54.101 and 54.401 of the Commission’s rules. See 47 C.F.R. §§ 54.101 and 54.401. Such ETCs must comply with the compliance plan approved herein in each state or territory where they are designated as an ETC, regardless of their claim of facilities for other purposes, such as eligibility for state universal service funding.

requirement, subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.<sup>5</sup> Therefore, in the *Lifeline Reform Order*, the Commission conditionally granted forbearance from the Act's facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.<sup>6</sup>

The Bureau has reviewed the compliance plans listed in the Appendix for conformance with the *Lifeline Reform Order*, and now approves those six compliance plans.<sup>7</sup>

Filings, including the Compliance Plans identified in the Appendix, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12<sup>th</sup> Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email [www.bcpiweb.com](http://www.bcpiweb.com).

**People with Disabilities:** To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Divya Shenoy, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

- FCC -

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<sup>5</sup> See *Lifeline Reform Order*, FCC 12-11 at paras. 368-381.

<sup>6</sup> See *id.* at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

<sup>7</sup> The Commission has not acted on any pending ETC petitions filed by these carriers, and this Public Notice only approves the compliance plans of the carriers listed above. While these compliance plans contain information on each carrier's Lifeline offering, we leave it to the designating authority to determine whether or not the carrier's Lifeline offerings are sufficient to serve consumers. See *Lifeline Reform Order*, FCC 12-11 at paras. 50 and 387.

### Appendix

<b>Petitioner</b>	<b>Compliance Plans As Captioned by Petitioner</b>	<b>Date of Filing</b>	<b>Docket Numbers</b>
American Broadband & Telecommunications	American Broadband & Telecommunications Revised Compliance Plan	April 27, 2012	09-197; 11-42
Budget PrePay, Inc.	Compliance Plan of Budget PrePay, Inc.	May 1, 2012	09-197; 11-42
Consumer Cellular, Inc.	Consumer Cellular Amended Revised Compliance Plan	April 18, 2012	09-197; 11-42
Global Connection, Inc. of America	Global Connection Inc. of America Compliance Plan	April 30, 2012	09-197; 11-42
TerraCom, Inc.	TerraCom, Inc. Second Revised Blanket Forbearance Compliance Plan	May 1, 2012	09-197; 11-42
Total Call Mobile, Inc.	Total Call, Inc. Revised Compliance Plan	May 17, 2012	09-197; 11-42



**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

_____	)	
In the Matter of	)	
	)	
Federal-State Joint Board on	)	WC Docket No. 09-197
Universal Service	)	
	)	
Lifeline and Link Up Reform Modernization)	)	WC Docket No. 11-42
	)	
Petition for Forbearance	)	
_____	)	

**AMERICAN BROADBAND & TELECOMMUNICATIONS  
REVISED COMPLIANCE PLAN**

**Background**

On February 25, 2011, American Broadband & Telecommunications (“American Broadband” or “Company”) filed a Petition for Forbearance (“Petition”) requesting that the Federal Communications Commission (“FCC” or “Commission”) forbear from enforcement of section 214(e)(1)(A) of the Act, which requires eligible telecommunications carriers (“ETC”) to use their own facilities to provide services supported by the Universal Service Fund (“USF”). The Commission issued a Public Notice seeking comment on American Broadband & Telecommunications’ Petition and no comments opposing the Petition were filed.<sup>1</sup> On June 30, 2011, the Company filed its initial draft Compliance Plan outlining its proposed compliance with the usual Commission conditions for ETCs. The Commission sought comment on the Plan and the Company subsequently filed an updated draft Plan on December 2, 2011.

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<sup>1</sup> *Wireline Competition Bureau Seeks Comments on American Broadband & Telecommunications Petition for Forbearance from Eligible Telecommunications Carrier Facilities Requirement*, Public Notice, DA 11-641 (rel April 7, 2011).

On January 31, 2012, the Commission approved several modifications to its Lifeline rules and provided blanket forbearance for non-facilities-based carriers wishing to provide Lifeline only services. In the *Lifeline Reform Order*,<sup>2</sup> the Commission noted that a carrier must comply with 911 requirements (which American Broadband already does) and file a Compliance Plan that provides specific information on the low income offerings of the carrier as well as outlining the steps the carrier will take to comply with the order, specifically with regards to the prevention of waste, fraud and abuse.<sup>3</sup> On March 13, 2012, American Broadband filed a revised compliance plan pursuant to the *Lifeline Reform Order*. With this filing, American Broadband makes several minor revisions to the March 13 filing. Through this revision, American Broadband demonstrates its current compliance with the *Lifeline Reform Order*, and willingness to comply with forthcoming procedures outlined in the order (such as use of the National Lifeline database), when such procedures become effective.

The *Lifeline Reform Order* also states that carriers like American Broadband who have pending Compliance Plans at the Commission should revise them to comply with the *Lifeline Reform Order*.<sup>4</sup> As such, American Broadband files this revised Compliance Plan, which complies with the requirements of the *Lifeline Reform Order*. American Broadband respectfully requests expeditious approval of its proposed Compliance Plan.

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<sup>2</sup> *Lifeline and Link Up Reform and Modernization, et al*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket 11-42, *et al*, FCC 12-11, (rel. February 6, 2012) (“*Lifeline Reform Order*”).

<sup>3</sup> *Lifeline Reform Order*, ¶ 368.

<sup>4</sup> *Id.*, at n. 983.

## **COMPLIANCE PLAN**

American Broadband commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. American Broadband will comply with all conditions set forth in any Commission order, the provisions of this Compliance Plan, and all laws and regulations governing its provision of Lifeline-supported wireless service (both non-facilities-based and facilities-based) to customers throughout our service territories and in addition take the steps set forth herein.

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

American Broadband will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission removed the requirement to obtain PSAP certifications from Low Income only ETCs in the *Lifeline Reform Order*, but reaffirmed the obligation to provide consumer access to 911 and E911 regardless of activation status and to provide E911-compliant handsets.<sup>5</sup> American Broadband can comply with both requirements immediately.

The Commission and consumers are hereby assured that all American Broadband customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from American Broadband handsets, even if the account associated with the handset has no minutes remaining. All Lifeline customers will have meaningful access to emergency calling services at the time the

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<sup>5</sup> *Lifeline Reform Order*, ¶¶ 373-75.

customer activates Lifeline service, and that such access will continue 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 carriers, such as Sprint and Verizon. American Broadband 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.

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

American Broadband & Telecommunications will ensure that all handsets used in connection with the Lifeline service offering will be E911-compliant. In fact, American Broadband's phones have always been and will continue to be 911 and E911-compliant. American Broadband uses phones from Sprint and Verizon that have been through a stringent certification process in either Sprint's or Verizon's handset certification lab, which ensures that the handset models used meet all 911 and E911 requirements. As a result, any 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. In the event that an existing customer does not have an E911-compliant handset, American Broadband will replace it with a new 911/E911-compliant handset at no charge to the customer. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

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

To safeguard against misuse of the Lifeline service plan, American Broadband will deal directly with the customer and collect initial and annual certifications required by the *Lifeline Reform Order*. As required by the Order, American Broadband will establish safeguards to prohibit more than one supported service for each household. American Broadband proposes the following plan to implement these certification and verification conditions and will modify the plan to conform to any new rules and orders, once issued and effective:

#### **A. Policy**

American Broadband will comply with the minimum federal certification and verification requirements for Lifeline eligibility and any additional requirements established by the states where it is designated as an ETC.

In addition to any state-imposed requirements, American Broadband will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements. American Broadband will enact the same stringent requirements of annual re-certification that it currently uses with its wireline Lifeline service offering. This process requires a customer signed, annual certification form to be entered into our systems prior to any benefits being extended for the next year.

#### **B. Certification Procedures**

American Broadband will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting American Broadband via telephone, facsimile, or the Internet. At the point of sale, consumers will be provided with printed information describing American Broadband's Lifeline program, including eligibility requirements, and instructions for enrolling. Materials from USAC, that will be developed

pursuant to the *Lifeline Reform Order*, may also be provided at the point of sale. Specific information will be provided to educate consumers about the one per household rules. Consumers will be signed up in person or directed via Company literature or advertising to a toll-free telephone number and to American Broadband's 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. American Broadband's application form for its wireless service will identify that it is a "Lifeline" application. A sample application form is attached hereto as Exhibit A. In addition to this document, applicants will be required to complete USAC's application form that will be developed pursuant to the *Lifeline Reform Order*, when that form is available.<sup>6</sup>

American Broadband understands and accepts the Commission's requirement that the Company have direct contact with all customers applying for participation in the Lifeline program. American Broadband enrolls individuals through two methods: person-to-person sign-up at areas set up at state government agencies or by application submitted by the individual. First, American Broadband has an employee or agent located in state government offices where members of the public come to meet with their case workers and sign up for various state programs. The agent will explain the eligibility requirements for the program, including participation in a qualifying program or earning income below 135% of the Federal Poverty Guidelines and will verify the individual's eligibility based on a meeting with the person's case worker and verifying documentation obtained from the case workers. The agent will also explain the program limitation of only one Lifeline service per household. Before the service is

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<sup>6</sup> *Lifeline Reform Order*, ¶ 78.

authorized, the individuals eligibility is also verified through the relevant databases as described in further detail below.

Alternatively, individuals may obtain a copy of the application at these state government offices, fill out the necessary information, sign the form and fax them to American Broadband for processing. These applications are also verified through the state case workers and review of the necessary documentation from the case worker. If an individual contacts American Broadband for service via phone, they are instructed to visit an agent (located in governments offices) to receive an application, complete it and fax it to the company. American Broadband does not undertake any outbound telemarketing nor do they accept applications online or over the phone. American Broadband will provide Lifeline-specific training to all personnel, whether employees or agents, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services.

Consumers who do not complete the application process in person must return the signed application and support documentation to the Company, normally by fax. In the future, should the Company use an electronic application process, consistent with Commission regulations, the Company will develop a system to 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 American Broadband's supervision by managers experienced in the administration of the Lifeline program. American Broadband will ensure that all required documentation is taken care of properly by using state-specific compliance checklists.

In addition to the Commission's requirements, in states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate, and to furnish proof that they currently participate in such program(s). For states with income-based eligibility criteria, 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 for federal default states) and will be required to provide proof of income-based eligibility. American Broadband will not retain copies of this information, but rather will maintain a database that records what information was provided.<sup>7</sup> Notwithstanding the foregoing with respect to program or income eligibility, for states that require American Broadband to enroll subscribers identified by the state or as eligible in a state database, American Broadband 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 they are head of their household and receive Lifeline-supported service only from American Broadband. Penalties for perjury will be clearly stated on the certification form. American Broadband will use substantially the following form of its certification both in the initial application and annually:

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 11 statements below)

1. 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 fines, imprisonment, de-enrollment or being barred from the program

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<sup>7</sup> *Lifeline Reform Order*, ¶ 101.



2. I understand that Lifeline is a federal benefit and is only available for one phone line per household, whether landline or wireless. For purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household requirement is a violation of FCC rules, will result in de-enrollment from the Lifeline program and potentially prosecution by the federal government. \_\_\_\_\_

3. I understand that households are not permitted to receive Lifeline benefits from multiple providers. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names AT&T Lifeline, Assurance Wireless, and Safelink.) I certify that to the best of my knowledge, I, and any members of my household, will only receive Lifeline from American Broadband & Telecommunications (AB&T). \_\_\_\_\_

4. I understand that I must notify AB&T within 30 days if I cease to participate in a qualifying federal program or my annual household income exceed this threshold. \_\_\_\_\_

5. I understand that I must cancel any Lifeline service or port my number to AB&T prior to establishing my service with AB&T. \_\_\_\_\_

6. I understand that Lifeline is a non-transferrable benefit and certify that I will only use this phone for my household's own use and will not resell or transfer it. \_\_\_\_\_

7. I will notify AB&T within 30 days if I, or any member of my household, no longer qualify for Lifeline, I or any members of my household move, or if I, or any member of my household, are receiving more than one Lifeline-supported service. \_\_\_\_\_

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

9. I certify that I meet the income-based or program-based eligibility criteria for receiving Lifeline service as described by FCC rules \_\_\_\_\_

10. I understand that my name, telephone number, and address will be divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, or my household, do not receive more than one Lifeline benefit. I consent to inclusion of this information in the support database. \_\_\_\_\_

11. I understand that if I have listed a temporary residential address, I will be required to verify my temporary residential address every 90 days. \_\_\_\_\_

Perjury and false statements are punishable by fines and/or imprisonment.

Signature (required) \_\_\_\_\_ Date \_\_\_\_\_

To the extent that USAC's disclosure and application form that is to be developed pursuant to the *Lifeline Reform Order* duplicates these disclosures, this form may be modified to eliminate duplication or eliminated outright if fully covered by the USAC certification form. In such event, American Broadband will use the USAC-developed certification form. Customers will also be provided a verification form consistent with parameters described in the annual Verification section described below. The application forms will require each applicant to provide their name and permanent residential address, and a billing address if different. American Broadband will incorporate this information into its customer information database. These forms will also collect a customer's date of birth and last four digits of the customer's Social Security Number as required by the *Lifeline Reform Order*.<sup>8</sup> Prior to initiating service for a customer, the Company will check the name and address of each Lifeline applicant (and the personal information required for verification) against its database to determine whether or not it is associated with a customer that already receives Lifeline-supported service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset or wireline phone associated with the address. American Broadband will also check the name and address against the national Lifeline database prior to initiating service, once such database is operational. If the Lifeline applicant or address is listed as a duplicate, the applicant will be required to complete the certification developed by USAC, that they live at a multiple household address. American Broadband will also verify a customer's eligibility using the database by collecting the customer's data of birth and last four digits of the customer's social security number and using this information to complete the

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<sup>8</sup> *Lifeline Reform Order*, ¶ 184.

verification process established by the *Lifeline Reform Order*. In addition, prior to requesting a subsidy, American Broadband will process and validate American Broadband's subsidy data, consistent with the standard procedures to be established by USAC and the forthcoming Lifeline database to automatically prevent any household that is already receiving a Lifeline subsidy for services provided by American Broadband from receiving a second Lifeline subsidy in that same month. Further, any prepaid customers who do not use the service in the first instance or who have not used the service within the past 60 days will not be considered active customers for the purposes of requesting subsidies.<sup>9</sup> For customers who are de-activated for non-usage, American Broadband will update USAC's Lifeline database (when it becomes operational) within one business day of the de-enrollment of the customer from the Lifeline service. American Broadband will provide Lifeline-specific training to all personnel, whether employees or agents, that interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services.

American Broadband 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 American Broadband customers from engaging in such abuse of the program. American Broadband will make full use of the national Lifeline database when it is operational. In the interim, because of American Broadband's relationship with multiple government agencies throughout our service territory, we are also able to certify eligibility directly with the state agency that provides benefits which qualify customers for Lifeline eligibility.

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<sup>9</sup> See Usage Policy, below.

### **C. Verification Procedures**

American Broadband will require every consumer enrolled in the Lifeline program to verify on an annual basis that they are the head of their household and only receive Lifeline service from one ETC.<sup>10</sup> American Broadband will notify each participating Lifeline consumer prior to their service anniversary date that they must confirm their continued eligibility in accordance with the applicable requirements. This notification will be mailed via the U.S. Postal Service to the address the subscriber has on record with American Broadband. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact American Broadband. Customers will have 60 days to complete the form, certify under penalty of perjury that they are the head of household and receive Lifeline service only from American Broadband, and return the form to American Broadband by mail or other means that may be developed in the future. The form will remind customers that Lifeline is a federal benefit, that it is only available for one line per household, that “household” in the context of the certification means any individual or group thereof who live together at the same address and share income and expenses, and that a household may not have service from multiple providers. The form will include a statement that violation of these rules constitutes a violation of the program’s rules that will result in immediate de-enrollment from the program and could be the basis for federal criminal prosecution.<sup>11</sup> Anyone who does not respond to the mailing and certify their continued eligibility will be de-enrolled from the Lifeline program.

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<sup>10</sup> *Lifeline Reform Order*, ¶ 92. Note that in the future, American Broadband may elect to have USAC administer the self-certification process on its behalf, to the extent that option is available in a given state.

<sup>11</sup> *Lifeline Reform Order*, ¶ 121.

Currently, customers will be required to complete the verification process by mail; however, American Broadband will offer additional options, such as web-based methods, in the future. Such verification will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from American Broadband at the discounted rate only available to those customers who are enrolled in its Lifeline program. American Broadband will report annually on its verification and re-verification procedures as required by the recently amended section 54.416 of the Commission's Rules.<sup>12</sup>

American Broadband submits that its Compliance Plan fully satisfies the conditions of the *Lifeline Reform Order*. Implementation of the procedures, outlined in this plan, will promote public safety and ensure that Lifeline customers have access to 911 and E911 services while safeguarding against misuse of the company's Lifeline service benefits.

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

##### **A. Non-usage Policy**

American Broadband will implement a non-usage policy whereby we will identify pre-paid Lifeline customers that have not used the Company's Lifeline service for 60 days. Specifically, if no usage appears on an activated American Broadband pre-paid Lifeline customer's account during any continuous 60-day period, American Broadband will promptly notify the customer that the customer is no longer eligible for American Broadband Lifeline service subject to a 30-day grace period. During the 30-day grace period, American Broadband 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 30-day grace period (such as making or receiving a voice call to/from anyone

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<sup>12</sup> *Lifeline Reform Order*, ¶ 120.

other than American Broadband or its agent, sending a text message, downloading data or adding money to the account), American Broadband will deactivate Lifeline services for that customer unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline. In addition, American Broadband will not seek to recover a federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service. Customers will be informed at the time service is initiated of the deactivation and de-enrollment process that will occur as a result of non-usage.<sup>13</sup>

Customers that receive phones via mail rather than in person must activate their service before they can place calls. American Broadband ensures that phones shipped to customers are only capable of calling 911 and the Company's interactive voice response ("IVR") system. A customer must call the IVR in order to complete the activation process. The Company does not submit a customer who received a shipped phone for Lifeline reimbursement until the customer completes this IVR activation process. American Broadband will apply this activation policy for shipped wireless handsets.

American Broadband will consult with the state commissions (PUCs) in the states where it provides Lifeline services regarding implementation of the policy described above. American Broadband expects that certain state PUCs or similar agencies may seek to incorporate state-specific variations to the policy. Consequently, American Broadband may modify the parameters of the inactivity policy described herein after consultation with the respective state PUCs.

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<sup>13</sup> *Lifeline Reform Order*, ¶ 257.

## **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, American Broadband will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. Customers shall also be informed that the service is non-transferable. These measures entail additional emphasis in written disclosures as well as live due diligence.

- a) Call Center and Sales Script – American Broadband will emphasize the “one Lifeline phone per household” restriction through its interaction with the potential customer at the call center. American Broadband will also emphasize the “one Lifeline phone per household” restriction through its direct sales contact with the potential customer. The sales training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. Attached as Exhibit B is a sample of training material that is used to educate sales personnel of the FCC’s regulations regarding the definition of household and the prohibition on multiple lines.
- b) Marketing, Advertising and Website Content – American Broadband, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. Attached as Exhibit C is a copy, to scale, of a two by three foot advertisement display, and description of wireless offerings.
- c) In addition to reminding consumers of the one-per-household rule, American Broadband will comply with the other marketing requirements in the *Lifeline Reform Order* and will explain in all marketing materials that the service offering is a Lifeline-supported service, only eligible consumers may enroll, what documentation is necessary for enrollment, Lifeline is a government benefit program, and consumers who willfully make false statements to obtain Lifeline can be punished by fine or imprisonment or barred from the program.

These statements will also appear on the company’s website ([www.ambt.net](http://www.ambt.net)) during the customer information/education cycle. At the point on its website when a customer inputs his/her zip code to verify that American Broadband offers service in their area, American Broadband will display the required marketing language in the section where the website explains the service and rate plan options. The message would flash to draw attention to it. In addition, American Broadband will include in its printed materials and website substantially the following statement “Not all Lifeline supported programs are identified as ‘Lifeline’ and may be marketed under other brand names.”

### **C. Cooperation with state and federal regulators**

American Broadband has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Sharing with state commissions (PUC), the FCC or USAC data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, American Broadband agrees to make available state-specific customer data, including name and address, 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 American Broadband's 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 American Broadband's 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.).

### **V. Included Usage**

American Broadband will offer at least one Lifeline plan that provides consumers with at least 250 included minutes-of-use per month at the lowest end user rate permitted under FCC rules. This provision will expire 36 months from the date of approval of this Compliance Plan.

### **VI. Service Areas**

American Broadband operates as a wireline and wireless carrier in the states of Michigan, Ohio and Indiana. In Michigan, American Broadband is an ETC serving wireline Lifeline customers and has an application pending to provide Lifeline-only wireless services. American Broadband's service territory in Michigan includes the non-rural wire centers and study areas of AT&T Michigan, Frontier North, Inc., Frontier Midstates, Inc., CenturyTel Midwest - Michigan,



Inc., CenturyTel of Michigan, Inc., CenturyTel of Northern Michigan, Inc., CenturyTel of Upper Michigan, Inc., Frontier Communications of Michigan, Inc., Deerfield Farmer's Telephone Company, Ogden Telephone Company, and Sand Creek Telephone Company. In Ohio, the Company is designated as an ETC for wireline services and has an application pending to provide Lifeline-only wireless services in certain exchanges of Verizon North Inc. and AT&T Ohio. In Indiana, the company is licensed as a CLEC in the territories of Frontier and AT&T (fka Indiana Bell). The company serves approximately 1,000 customers in Indiana. The company currently has an application to become a ETC in Indiana pending before the Indiana Utility Regulatory Commission.

Note that American Broadband does not provide service to any Tribal areas, nor do its current business plans anticipate serving Tribal areas in the future. If and when American Broadband plans to expand its service to Tribal areas, American Broadband will amend its application and certification forms to reflect requirements specific to the service of Tribal areas.

## **VII. Statements required under Section 54.2002 of the Commission's Rules**

### ***A. Compliance with Service Requirements***

American Broadband certifies that it does now, and will in the future comply with all applicable state and federal requirements applicable to the receipt of Lifeline support.

### ***B. Emergency Functionality***

American Broadband is technically qualified to remain functional during emergency situations. In particular, American Broadband's critical infrastructure, its Class 5 switch, is located in a facility that provides redundant and battery back-up power to minimize the risk of service outages during emergency situations. In addition, as a reseller of wireline and wireless

services, American Broadband relies on the network redundancy and disaster preparedness of its network suppliers.

**C. Consumer Protection**

American Broadband is committed to provide service consistent with appropriate standards for customer protection as established by the FCC and the applicable state Commissions (Ohio, Michigan and Indiana). For the Company's wireless services, American Broadband is committed to providing service in accordance with CTIA's Consumer Code for Wireless Service.

**D. Technical and Financial Qualifications**

In accordance with the *Lifeline Reform Order*,<sup>14</sup> American Broadband submits that it is technically and financially qualified to operate as a Lifeline-only ETC. As noted above, American Broadband already operates as a wireline Lifeline ETC in the states of Michigan and Ohio, and is licensed as a telecommunications carrier in Ohio, Michigan and Indiana. American Broadband serves more than 30,000 customers in these three states, including more than 10,000 Lifeline-qualified wireline customers in Ohio and Michigan.

The Company's management has more than 50 years experience in the telecommunications industry. The Company owns and operates a partially facilities-based network, including a class 5 switch located in Toledo, Ohio. The Company's financial qualifications are well established, after having been deemed financially qualified to be both a licensed telecommunications carrier and an ETC by two state commissions. Lifeline customers are a relatively small part of the Company's overall revenue, and the Company is not dependent upon Lifeline support revenue as its primary source of income. The Company operates

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<sup>14</sup> *Lifeline Reform Order*, at ¶ 387.

profitably and has never filed for bankruptcy protection and plans measured expansion into neighboring states as business conditions allow.

American Broadband is a privately-held company and has no parent company and no affiliated companies. American Broadband has never been the subject of a state enforcement action or ETC revocation proceedings in any state.

***E. Lifeline Service Offerings***

The required information regarding the Company's Lifeline offerings is included in section V., above, as well as Exhibit C to this filing.

**Conclusion**

American Broadband respectfully requests that the Commission expeditiously approve its Compliance Plan so that the company may begin providing the benefits of Lifeline service to qualified low-income customers as soon as possible.

Respectfully submitted,

*/s/ electronically signed*

Tamar E. Finn  
Douglas D. Orvis II  
Kimberly A. Lacey  
Bingham McCutchen LLP  
2020 K Street, N.W.  
Washington, DC 20006

Dated: April 27, 2012

**Exhibit A**

**Sample Application Form**

**Wireless Lifeline Assistance Application**

**PLEASE MAIL OR FAX SIGNED APPLICATION TO:**

ABT Wireless Lifeline— PO Box 577 Toledo, OH 43697

Toll free: 877-777-7922

Fax: 877-211-3705



**PLEASE READ, INITIAL AFTER EACH STATEMENT AND SIGN THE FOLLOWING STATEMENT**

*By signing below, I certify under penalty of perjury – (additionally, please initial each of the 11 statements below)*

1. 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 fines, imprisonment, de-enrollment or being barred from the program \_\_\_\_
2. I understand that Lifeline is a federal benefit and is only available for one phone line per household, whether landline or wireless. For purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one-per-household requirement is a violation of FCC rules, will result in de-enrollment from the Lifeline program and potentially prosecution by the federal government. \_\_\_\_
3. I understand that households are not permitted to receive Lifeline benefits from multiple providers. (Some Lifeline services are not marketed under a "Lifeline" name; these include Lifeline services sold under the names AT&T Lifeline, Assurance Wireless, and Safelink.) I certify that to the best of my knowledge, I, and any members of my household, will only receive Lifeline from American Broadband & Telecommunications (AB&T). \_\_\_\_
4. I understand that I must notify AB&T within 30 days if I cease to participate in a qualifying federal program or my annual household income exceed this threshold. \_\_\_\_
5. I understand that I must cancel any Lifeline service or port my number to AB&T prior to establishing my service with AB&T. \_\_\_\_
6. I understand that Lifeline is a non-transferrable benefit and certify that I will only use this phone for my household's own use and will not resell or transfer it. \_\_\_\_
7. I will notify AB&T within 30 days if I, or any member of my household, no longer qualify for Lifeline, I or any members of my household move, or if I, or any member of my household, are receiving more than one Lifeline-supported service. \_\_\_\_
8. I understand that I may be required to re-certify my continued eligibility at any time, and at least annually, and failure to so will result in the termination of my Lifeline benefits \_\_\_\_
9. I certify that I meet the income-based or program-based eligibility criteria for receiving Lifeline service as described by FCC rules \_\_\_\_
10. I understand that my name, telephone number, and address will be divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, or my household, do not receive more than one Lifeline benefit. I consent to inclusion of this information in the support database. \_\_\_\_
11. I understand that if I have listed a temporary residential address, I will be required to verify my temporary residential address every 90 days. \_\_\_\_

**Perjury and false statements are punishable by fines and/or imprisonment.**

Signature \_\_\_\_\_

Date \_\_\_\_\_

**Wireless Lifeline Assistance Application**

PLEASE MAIL OR FAX SIGNED APPLICATION TO:

ABT Wireless Lifeline- PO Box 577 Toledo, OH 43697

Toll free: 877-777-7922

Fax: 877-211-3705

**PLEASE COMPLETE BOTH SIDES OF THIS APPLICATION**Your Name: \_\_\_\_\_  
(Last) (First) (Middle Initial)

Current Home Telephone Number: \_\_\_\_\_ Best Contact or Cell Number: \_\_\_\_\_

Residential Address: \_\_\_\_\_  
(Number) (Street) (Apartment, Floor)

City/Town: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Is this a Permanent Address? ☐ YES ☐ NO Date of Birth \_\_\_\_/\_\_\_\_/\_\_\_\_ Last 4 Digits of Your Social Security Number \_\_\_\_\_Is this a multiple household address? ☐ YES ☐ NO Billing Address (if different from Residential address)

(Number) (Street) (Apartment, Floor) City/Town State Zip Code

**Please Select Your Wireless Plan**☐ Lifeline Wireless Essentials 250☐ Lifeline Wireless Essentials 500☐ Lifeline Wireless Unlimited**Program Eligibility**I receive Assistance from one of the following programs (Check all that apply) (NOTE: Social Security and Medicare Alone **DO NOT** qualify for Lifeline):

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Food Stamps                                   | <input type="checkbox"/> Federal Public Housing and/or Section 8    | <input type="checkbox"/> Disability Assistance                          |
| <input type="checkbox"/> Medicaid (Not Medicare)                       | <input type="checkbox"/> Ohio or Michigan Works First /TANF         | <input type="checkbox"/> National School Lunch Program                  |
| <input type="checkbox"/> Supplemental Security Income (SSI)            | <input type="checkbox"/> Low Income Home Energy Assistance (LIHEAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Federal Public Housing Assistance (Section 8) |   |   |

**AMBT USE ONLY – Please identify which Program Documents from the Box above you used for proof of Program Eligibility**

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Proof of Food Stamp Participation                | <input type="checkbox"/> Federal Public Housing and/or Section 8          | <input type="checkbox"/> Disability Assistance Participation Certification |
| <input type="checkbox"/> Medicaid (Not Medicare)- Program Documentation   | <input type="checkbox"/> Ohio or Michigan Works First /TANF documentation | <input type="checkbox"/> National School Lunch Program Eligibility         |
| <input type="checkbox"/> Supplemental Security Income (SSI) Participation | <input type="checkbox"/> Low Income Home Energy Assistance-Documents      | <input type="checkbox"/> Temporary Assistance for Needy –TANF Cert         |
|   | <input type="checkbox"/> Federal Public Housing Assistance (Section 8)    |  |

**Income Based Eligibility – DO NOT COMPLETE THIS SECTION IF YOU COMPLETED THE PROGRAM ELIGIBILITY SECTION ABOVE**

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

Household Size	Maximum Yearly Income
1	\$16,335
2	\$22,065
3	\$27,795
_____	\$ _____

If you have more than 3 people in your household, write the number and add \$5,730 for each additional person on top of the \$27,795

**Proof of Income Documentation Examples Include:**

- ☐ Prior year's State or Federal income tax return OR
- ☐ Most recent type of current statement from the income source(s) noted below:
- ☐ Three consecutive months' worth of your most current pay stubs
- ☐ Social Security benefits statement
- ☐ Veterans Administration benefits statement
- ☐ Retirement/Pension benefits statement
- ☐ Divorce decree or child support document
- ☐ Unemployment/Workers Compensation benefits statement

I authorize AB&amp;T to Contact my Case Worker to Verify Eligibility:

Name of Case Worker: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Eligibility verified by (initial all that apply) (1) Reviewing Customer Documentation\_\_\_\_; (2) Contacting Caseworker\_\_\_\_; (3) Eligibility Database Verification\_\_\_\_

**NOTE: YOU MUST COMPLETE BOTH SIDES OF THIS FORM BEFORE WE CAN PROCESS YOUR APPLICATION****FAX SIGNED APPLICATION TO 877-211-3705****v.ASSISTWRLSv.022712**

**Exhibit B**

Training Materials

American Broadband & Telecommunications Call Center/Sales Training

**The following information may be used by sales and calling center staff to respond to inquiries about Lifeline supported services.**

(1) Confirm the individual is the head of household and they are not currently receiving a Lifeline subsidized service through the following questions:

- “Do you currently have wireless or home phone service?”
- **If no:** skip remaining questions and complete application process.
- **If yes:** “Is the [wireless or home phone] service a subsidized service or do you pay full price?”
- **If subsidized:** “By law, the Lifeline program is only available for one phone per household. Do you know if your current phone is subsidized under the Lifeline program?”
- **If individual is not sure:** “Who is your provider for that service? What is the name of the service?” (Note that Assurance Wireless and SafeLink are Lifeline services.)
- **If it is a Lifeline service:** “We cannot provide you with a second Lifeline phone. If there is a problem with your current service, and you would like to switch to our service, you must authorize ABT to port your telephone number to our service.”

(2) If it appears that the individual does not currently have Lifeline service, proceed with the following steps:

- Using ABT’s database, verify the individual (name, date of birth, last four digits of social security number) is not currently in the ABT system as a registered recipient of Lifeline services. Repeat with state/USAC database if and when available.
  - If there is an active Lifeline account for that individual, explain that “by law, the Lifeline program is only available for one phone per household.” For example, if the customer is in ABT’s database, inform the customer that they must choose ABT wireline Lifeline OR wireless Lifeline service.
  - If there is no active account for that individual, proceed with the application process.
- Using ABT’s database, verify the individual’s address is not currently in the ABT system as a registered recipient of Lifeline services. Repeat with state/USAC database if and when available.



- If there is an active Lifeline account for that address, explain that “by law, the Lifeline program is only available for one phone per household.”
- Explain that, for purposes of the Lifeline program, a household is any individual or group of individuals who live together at the same address and share income and expenses.
- If customer states address is multifamily or group housing, use USAC form (when developed) to determine if customer qualifies for Lifeline as multiple household.
- If there is no active account for the applicant’s address or household, proceed with the application process.

(3) If check of database(s) verifies individual is not current Lifeline recipient, assist customer in completing application.

- Customer must complete both sides of form.
- Confirm residential address is billing address. If not, collect billing address IN ADDITION TO residential address.
- If address is not permanent, explain that American Broadband must verify address every 90 days. If customer does not respond, Lifeline service will be deactivated.
- Explain service plan options (refer to service description sheet). For customers that elect pre-paid Lifeline Wireless Essentials 250, explain non-usage policy.
  - If no usage appears on an activated American Broadband pre-paid Lifeline customer’s account during any continuous 60-day period, American Broadband will promptly notify the customer that the customer is no longer eligible for American Broadband Lifeline service subject to a 30-day grace period.
  - During the 30-day grace period, American Broadband will attempt to reach customer 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 30-day grace period (such as making or receiving a voice call to/from anyone other than American Broadband or its agent, sending a text message, downloading data or adding money to the account), American Broadband will deactivate Lifeline services for that customer unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline.
- With the exception of program eligibility/income eligibility, all sections must be completed.

- Customer should complete EITHER program eligibility OR income eligibility section.
  - Review customer documentation supporting eligibility carefully, note which documents reviewed in ABT database.
- Ensure customer reads and initials statements 1-8 on certification section.

**Exhibit C**

Sample Advertisement and Description of Wireless Offerings

# GET CONNECTED... STAY CONNECTED. GET WIRELESS LIFELINE.



**Wireless Lifeline** is a government assisted program that provides qualified low-income consumers with:

- Free cellular phone, provided by American Broadband\*
- Includes 250 minutes free monthly airtime, local or long distance
- Free 911 access
- No credit check

Service provided by American Broadband and Telecommunications, a local wireless provider of Lifeline-supported services.

#### SIGN UP TODAY.

Call 1 (877) 777-7922  
Fax your application to 1 (877) 211-3705  
Visit [www.ambt.net](http://www.ambt.net)

You may only have one Lifeline-supported line, either wireless or wireline, per household. Only eligible customers may enroll in the Lifeline program. Proof of eligibility, such as documentation of receipt of benefits (such as Medicaid, TANF or SSI) or proof of income (such as tax returns or pay stubs), is required to enroll. Lifeline is a federal benefit program; persons making false statements in order to obtain Lifeline service can be subject to fines, imprisonment or barred from the Lifeline program.

\* Free phone is not supplied or subsidized by any government program.

# AMERICAN

BROADBAND + TELECOMMUNICATIONS

## Stay Connected Wirelessly with:

- Potential or current employers
- Children who are at home while their parents have to go to work
- Healthcare specialists
- Vital emergency responders
- Relatives during a personal emergency

## ALL American Broadband & Telecommunications Wireless Lifeline plans come with:

- Superior areas of coverage throughout the entire United States
- Access to 411 with no airtime charges
- Unlimited 911 access
- Call waiting
- Call ID
- Voicemail

## 3 Great Plans to Choose From!

### Lifeline Wireless Essentials 250

**Plan Price: Free\***

- 250 FREE Voice Minutes added every month, automatically, you do nothing.
- Includes Free Cell Phone\*
- Access to 911
- Free Voicemail, Caller ID and Call Waiting
- Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses.
- No annual contract, no monthly Bills

*\*Assumes initial and continued program eligibility requirements are met - Non-usage for 60 days will result in a notice that service will be deactivated in 30 days; if customer actively uses service during the 30-day grace period, service will remain active.*

### Lifeline Wireless Essentials 500

**Plan Price: \$9.95 per month**

- 500 Voice Minutes added every month, automatically, you only pay \$9.95.
- Includes Free Cell Phone\*
- Access to 911
- Free Voicemail, Caller ID and Call Waiting
- Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses.
- No annual contract

*\*Assumes initial and continued program eligibility requirements are met*

### Lifeline Wireless Unlimited

**Plan Price: \$39.95 per month**

- Unlimited Voice Minutes and Unlimited Texting, you only pay \$39.95.
- Includes Free Cell Phone\*
- Access to 911
- Free Voicemail, Caller ID and Call Waiting
- Access to Operator Service and Directory Listing. OSDA service includes information and connection to publicly listed, domestic, landline telephone numbers and Addresses.
- No annual contract

*\*Assumes initial and continued program eligibility requirements are met*

## Need More Minutes? We have 6 Easy Top Up Plans. You can Add Minutes 24 hours per Day, 7 Days Per Week.

### Options\*

100 Talk or Text Minutes	\$3.99
180 Talk or Text Minutes	\$5.99
200 Talk or Text Minutes	\$6.99

### Options\*

240 Talk or Text Minutes	\$ 9.99
360 Talk or Text Minutes	\$12.99
500 Talk or Text Minutes	\$19.99

*\* 1 Text is the equivalent of 1 minute of talk time*

## **Exhibit C**

American Broadband and Telecommunications Company

Proposed Designated Service Areas

<u>NPA</u>	<u>NXX</u>	<u>State</u>	<u>Company</u>	<u>OCN</u>	<u>Ratecenter</u>	<u>CLLI</u>	<u>Switch Name</u>	<u>LATA</u>
401	200	RI	AT&T LOCAL	7421	BRISTOL	PRVDRIWAQMD	PROVIDENCE	130
401	200	RI	AT&T LOCAL	7421	BRISTOL	PRVDRIWAQMD	PROVIDENCE	130
401	215	RI	AT&T LOCAL	7421	PROVIDENCE	PRVDRIGRXB	PROVIDENCE	130
401	237	RI	AT&T LOCAL	7421	WARREN	PRVDRIGRMD	PROVIDENCE	130
401	250	RI	AT&T LOCAL	7421	W WARWICK	PRVDRIGRXB	PROVIDENCE	130
401	287	RI	AT&T LOCAL	7421	WARWICK	PRVDRIGRXB	PROVIDENCE	130
401	305	RI	AT&T LOCAL	7421	PAWTUCKET	PRVDRIGRQMD	PROVIDENCE	130
401	315	RI	AT&T LOCAL	7421	WESTERLY	PRVDRIGRMD	PROVIDENCE	130
401	343	RI	AT&T LOCAL	7421	HOPEVALLEY	PRVDRIGRXIX	PROVIDENCE	130
401	343	RI	AT&T LOCAL	7421	HOPEVALLEY	PRVDRIGRXIX	PROVIDENCE	130
401	363	RI	AT&T LOCAL	7421	NARRAGNSTT	PRVDRIGRMD	PROVIDENCE	130
401	363	RI	AT&T LOCAL	7421	NARRAGNSTT	PRVDRIGRMD	PROVIDENCE	130
401	409	RI	AT&T LOCAL	7421	CAROLINA	NOCLIKNOWN		130
401	409	RI	AT&T LOCAL	7421	CAROLINA	NOCLIKNOWN		130
401	471	RI	AT&T LOCAL	7421	GREENWICH	PRVDRIGRMD	PROVIDENCE	130
401	551	RI	AT&T LOCAL	7421	NEWPORT	PRVDRIGRXB	PROVIDENCE	130
401	610	RI	AT&T LOCAL	7421	COVENTRY	PRVDRIGRXB	PROVIDENCE	130
401	733	RI	AT&T LOCAL	7421	WOONSOCKET	PRVDRIGRXB	PROVIDENCE	130
401	733	RI	AT&T LOCAL	7421	WOONSOCKET	PRVDRIGRXB	PROVIDENCE	130
401	201	RI	VERIZON NEW ENGLAND INC.	9102		NOCLIKNOWN		
401	202	RI	VERIZON NEW ENGLAND INC.	9102		NOCLIKNOWN		
401	222	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	224	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	231	RI	VERIZON NEW ENGLAND INC.	9102	CENTREDALE	NPRVRIMSDS1	PROVIDENCE	130
401	232	RI	VERIZON NEW ENGLAND INC.	9102	CENTREDALE	NPRVRIMSDS1	PROVIDENCE	130
401	233	RI	VERIZON NEW ENGLAND INC.	9102	CENTREDALE	NPRVRIMSDS1	PROVIDENCE	130
401	235	RI	VERIZON NEW ENGLAND INC.	9102	WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	242	RI	VERIZON NEW ENGLAND INC.	9102		NOCLIKNOWN		
401	243	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	245	RI	VERIZON NEW ENGLAND INC.	9102	WARREN	WRRNRIEVDS0	WARREN	130
401	246	RI	VERIZON NEW ENGLAND INC.	9102	WARREN	RVSDRISODS0	RIVERSIDE	130
401	247	RI	VERIZON NEW ENGLAND INC.	9102	WARREN	WRRNRIEVDS0	WARREN	130
401	253	RI	VERIZON NEW ENGLAND INC.	9102	BRISTOL	WRRNRIEVDS0	WARREN	130
401	254	RI	VERIZON NEW ENGLAND INC.	9102	BRISTOL	WRRNRIEVDS0	WARREN	130
401	267	RI	VERIZON NEW ENGLAND INC.	9102	NO KINGSTN	NKTWRIPHDS0	NORTH KINGST	130
401	268	RI	VERIZON NEW ENGLAND INC.	9102	NO KINGSTN	NKTWRIPHDS0	NORTH KINGST	130
401	272	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	273	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	274	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	275	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	276	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	277	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	278	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	282	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	290	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	294	RI	VERIZON NEW ENGLAND INC.	9102	NO KINGSTN	NKTWRIPHDS0	NORTH KINGST	130
401	295	RI	VERIZON NEW ENGLAND INC.	9102	NO KINGSTN	NKTWRIPHDS0	NORTH KINGST	130
401	322	RI	VERIZON NEW ENGLAND INC.	9102	WESTERLY	WKPGRIWARS4	WEEKAPAUG	130
401	325	RI	VERIZON NEW ENGLAND INC.	9102	WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	331	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	333	RI	VERIZON NEW ENGLAND INC.	9102	PAWTUCKET	ASTNRANDS1	ASHTON	130
401	334	RI	VERIZON NEW ENGLAND INC.	9102	PAWTUCKET	ASTNRANDS1	ASHTON	130
401	335	RI	VERIZON NEW ENGLAND INC.	9102	PAWTUCKET	ASTNRANDS1	ASHTON	130
401	341	RI	VERIZON NEW ENGLAND INC.	9102	NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	348	RI	VERIZON NEW ENGLAND INC.	9102	WESTERLY	WRLYRIMADS0	WESTERLY	130
401	350	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	351	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	353	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	NPRVRIMSDS1	PROVIDENCE	130
401	354	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	NPRVRIMSDS1	PROVIDENCE	130
401	357	RI	VERIZON NEW ENGLAND INC.	9102	WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	364	RI	VERIZON NEW ENGLAND INC.	9102	CAROLINA	CRLNRIMARS2	CAROLINA	130
401	370	RI	VERIZON NEW ENGLAND INC.	9102	PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130

401	377 RI	VERIZON NEW ENGLAND INC.	9102 WESTERLY	ASWYRIYBRS1	ASHAWAY	130
401	392 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	393 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	397 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	412 RI	VERIZON NEW ENGLAND INC.	9102 COVENTRY	CNTYRISTR51	COVENTRY	130
401	415 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	415 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	415 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	421 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	423 RI	VERIZON NEW ENGLAND INC.	9102 JAMESTOWN	JMTWRINARS1	JAMESTOWN	130
401	431 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	EPRVRINBDS0	EAST PROVIDEN	130
401	432 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	EPRVRINBDS0	EAST PROVIDEN	130
401	433 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	RVSDRISODS0	RIVERSIDE	130
401	434 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	EPRVRINBDS0	EAST PROVIDEN	130
401	435 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	EPRVRINBDS0	EAST PROVIDEN	130
401	437 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	RVSDRISODS0	RIVERSIDE	130
401	438 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	EPRVRINBDS0	EAST PROVIDEN	130
401	444 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	452 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	453 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	454 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	455 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	456 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	457 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	458 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	459 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	460 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	461 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	462 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	463 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	WRWKRIWSDS0	WARWICK	130
401	464 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	466 RI	VERIZON NEW ENGLAND INC.	9102 BLOCK IS	BLISRIOTRS1	BLOCKISLAND	130
401	467 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	468 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	477 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	478 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	482 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	484 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWAPS0	PROVIDENCE	130
401	484 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWAPS0	PROVIDENCE	130
401	521 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	525 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	528 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	539 RI	VERIZON NEW ENGLAND INC.	9102 HOPEVALLEY	HPVYRIMARS3	HOPE VALLEY	130
401	541 RI	VERIZON NEW ENGLAND INC.	9102 GREENWICH	EGRNRICHDS0	GREENWICH	130
401	544 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	550 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKKNOWN		
401	553 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	563 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	567 RI	VERIZON NEW ENGLAND INC.	9102 PASCOAG	PSCGRIPARS1	PASCOAG	130
401	568 RI	VERIZON NEW ENGLAND INC.	9102 PASCOAG	PSCGRIPARS1	PASCOAG	130
401	574 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	575 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	581 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	582 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	588 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	596 RI	VERIZON NEW ENGLAND INC.	9102 WESTERLY	WRLYRIMADS0	WESTERLY	130



401	598 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	621 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	624 RI	VERIZON NEW ENGLAND INC.	9102 TIVERTON	TVTNRIHADS0	TIVERTON	130
401	625 RI	VERIZON NEW ENGLAND INC.	9102 TIVERTON	TVTNRIHADS0	TIVERTON	130
401	635 RI	VERIZON NEW ENGLAND INC.	9102 LTLCOMPTON	LTCMRIWERS1	LITTLE COMPTC	130
401	647 RI	VERIZON NEW ENGLAND INC.	9102 SCITUATE	SCTTRISIRS1	SCITUATE	130
401	658 RI	VERIZON NEW ENGLAND INC.	9102 CUMBLND HL	WNSCRICLDS0	WOONSOCKET	130
401	665 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	682 RI	VERIZON NEW ENGLAND INC.	9102 PORTSMOUTH	PTMORIEMDS0	PORTSMOUTH	130
401	683 RI	VERIZON NEW ENGLAND INC.	9102 PORTSMOUTH	PTMORIEMDS0	PORTSMOUTH	130
401	700 RI	VERIZON NEW ENGLAND INC.	9102	NOCLLIKNOWN		
401	721 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	722 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	723 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	724 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	725 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	726 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	727 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	728 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	729 RI	VERIZON NEW ENGLAND INC.	9102 PAWTUCKET	PWTCRIHIDS1	PAWTUCKET	130
401	732 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	734 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	736 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	737 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	738 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	739 RI	VERIZON NEW ENGLAND INC.	9102 WARWICK	WRWKRIWSDS0	WARWICK	130
401	745 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	751 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	752 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	754 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWA06T	PROVIDENCE	130
401	762 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	763 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	765 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	766 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	767 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	768 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	769 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	770 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	772 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	776 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	780 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	781 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	782 RI	VERIZON NEW ENGLAND INC.	9102 NARRAGNSTT	NRGNRIMADS1	NARRAGANSET	130
401	783 RI	VERIZON NEW ENGLAND INC.	9102 NARRAGNSTT	NRGNRIMADS1	NARRAGANSET	130
401	784 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	785 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	786 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	787 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS4		130
401	788 RI	VERIZON NEW ENGLAND INC.	9102 NARRAGNSTT	NRGNRIMADS1	NARRAGANSET	130
401	789 RI	VERIZON NEW ENGLAND INC.	9102 NARRAGNSTT	NRGNRIMADS1	NARRAGANSET	130
401	792 RI	VERIZON NEW ENGLAND INC.	9102 NARRAGNSTT	NRGNRIMADS1	NARRAGANSET	130
401	814 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	821 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WWWKRIMADS1	WEST WARWIC	130
401	822 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WWWKRIMADS1	WEST WARWIC	130
401	823 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WWWKRIMADS1	WEST WARWIC	130
401	825 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WRWKRIWSDS0	WARWICK	130
401	826 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WWWKRIMADS1	WEST WARWIC	130
401	827 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WWWKRIMADS1	WEST WARWIC	130
401	828 RI	VERIZON NEW ENGLAND INC.	9102 W WARWICK	WWWKRIMADS1	WEST WARWIC	130
401	831 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	832 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	841 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	842 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130

401	843 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	844 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKNOWN		
401	845 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	846 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	847 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	848 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	849 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	851 RI	VERIZON NEW ENGLAND INC.	9102 NEWPORT	NWPTRIBUDS0	NEWPORT	130
401	861 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	863 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	865 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	867 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	868 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIWADS2	PROVIDENCE	130
401	872 RI	VERIZON NEW ENGLAND INC.	9102 WOONSOCKET	WNSCRICLDS0	WOONSOCKET	130
401	874 RI	VERIZON NEW ENGLAND INC.	9102 NARRAGNSTT	NRGNRIMADS1	NARRAGANSET	130
401	884 RI	VERIZON NEW ENGLAND INC.	9102 GREENWICH	EGRNRICHDS0	GREENWICH	130
401	885 RI	VERIZON NEW ENGLAND INC.	9102 GREENWICH	EGRNRICHDS0	GREENWICH	130
401	886 RI	VERIZON NEW ENGLAND INC.	9102 GREENWICH	EGRNRICHDS0	GREENWICH	130
401	920 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKNOWN		
401	934 RI	VERIZON NEW ENGLAND INC.	9102 SCITUATE	GLCSRIWGDS0	GLOCESTER	130
401	941 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	PRVDRIBRDS1	PROVIDENCE	130
401	942 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	943 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	944 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	946 RI	VERIZON NEW ENGLAND INC.	9102 PROVIDENCE	CNTNRIPHDS1	PROVIDENCE	130
401	949 RI	VERIZON NEW ENGLAND INC.	9102 CENTREDALE	GLCSRIWGDS0	GLOCESTER	130
401	958 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKNOWN		
401	959 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKNOWN		
401	968 RI	VERIZON NEW ENGLAND INC.	9102 WGLOCESTER	PSCGRIPARS1	PASCOAG	130
401	986 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKNOWN		
401	987 RI	VERIZON NEW ENGLAND INC.	9102	NOCLIKNOWN		

## **Exhibit D**

American Broadband and Telecommunications Company  
Rhode Island-Specific Enrollment Form/Certification