



Ellen Taylor  
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August 25, 2016

Via Email & Regular Mail

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

Re: Boomerang Wireless, LLC d/b/a enTouch Wireless

Dear Ms. Massaro:

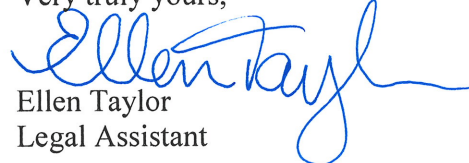
I am enclosing the following documents for filing on behalf of our client, Boomerang Wireless, LLC d/b/a enTouch Wireless:

1. *Application of Boomerang Wireless, LLC d/b/a enTouch Wireless for Designation as a Federal Eligible Telecommunications Carrier in the State of Rhode Island for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households (Low Income Only) (original + six copies);*
2. *Application of Boomerang Wireless, LLC d/b/a enTouch Wireless for Designation as an Authorized Class VI Telecommunications Carrier (original + one copy).*

Also enclosed is our check in the amount of \$300.00 in payment of the fee to submit the Class VI Designation Application.

Please let us know if you have any questions.

Very truly yours,

  
Ellen Taylor  
Legal Assistant

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Enclosures

cc: Leo Wold, Esq., Ass't. Attorney General  
Julia Redman-Carter, Boomerang Wireless, LLC

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

In the Matter of	)	
BOOMERANG WIRELESS, LLC d/b/a	)	
ENTOUCH WIRELESS	)	Docket No.:
	)	
	)	

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**APPLICATION OF BOOMERANG WIRELESS, LLC D/B/A ENTOUCH WIRELESS  
FOR DESIGNATION AS A FEDERAL ELIGIBLE TELECOMMUNICATIONS  
CARRIER IN THE STATE OF RHODE ISLAND FOR THE LIMITED PURPOSE OF  
OFFERING WIRELESS LIFELINE SERVICE TO QUALIFIED HOUSEHOLDS  
(LOW INCOME ONLY)**

COMES NOW Boomerang Wireless, LLC d/b/a enTouch Wireless (“enTouch Wireless” or the “Company”) and, pursuant to the Federal Communications Act of 1934, as amended (the “Act”), 47 U.S.C. § 214(e)(2), implementing rules of the Federal Communications Commission (“FCC”) and Rules of the State of Rhode Island and Providence Plantations Public Utilities Commission<sup>1</sup> (“the Commission”), hereby requests that the Commission designate enTouch Wireless as a federal Eligible Telecommunications Carrier (“ETC”) throughout the State of Rhode Island (the “Service Area”) for the purpose of receiving federal low-income universal service support for prepaid wireless services, specifically Lifeline and tribal Lifeline. enTouch Wireless does not at this time seek ETC designation (1) for the purpose of receiving federal universal service support for providing service to high-cost areas or (2) on a wireline basis.<sup>2</sup> A list of each exchange for which enTouch Wireless is requesting ETC status in the State of Rhode

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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 and Certification and Verification Processes for Compliance with Providing Lifeline and LinkUp Service, effective November 4, 2010 (the “Commission’s ETC Rules”).

<sup>2</sup> enTouch Wireless seeks only Lifeline support from the low-income mechanism of the federal Universal Service Fund (“USF”) and is not seeking support from the high-cost support mechanism. ETC certification requirements related to the high-cost program are therefore not applicable to enTouch Wireless’ application.

Island along with a map is attached hereto as **Exhibit “A,”** which includes certain tribal areas in Rhode Island. enTouch Wireless respectfully requests that the Commission grant this Application and that it do so expeditiously so that enTouch Wireless may begin providing wireless Lifeline service to qualified low-income households at the earliest practicable time. In further support of its Application, enTouch Wireless states as follows:

### **INFORMATION REGARDING THE APPLICANT**

1. Boomerang Wireless, LLC is an Iowa limited liability company with its principal offices located at 955 Kacena Road, Suite A, Hiawatha, Iowa 52233. The Company’s Articles of Organization and authorization to transact business in Rhode Island are attached hereto as **Exhibit “B.”** Submitted contemporaneously with this application is an Application Package for authority to operate as a Class VI telecommunications carrier.

2. As of the date of this Application, the Company has been designated as a wireless ETC in twenty-four states: Arizona, Arkansas, California, Colorado, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, North Dakota, Ohio, Oklahoma, Oregon, South Carolina, Texas, Washington, West Virginia and Wisconsin. Of these states, the Company currently serves Native American populations residing on tribal lands in the states of Arizona, Iowa, Kansas, Michigan, Mississippi, Minnesota, North Dakota, Oklahoma, Washington and Wisconsin. In addition, the Company has applications pending in seventeen jurisdictions for designation as an ETC on a wireless basis for federal

support for Lifeline services.<sup>3</sup> enTouch Wireless has never been denied ETC designation by any state commission or by the FCC in connection with any state.

3. Correspondence or communications pertaining to this Application should be directed to enTouch Wireless' attorneys of record:

J. Richard Ratcliffe, Esq.  
Jeffrey Biolchini, Esq.  
Ratcliffe Harten Burke & Galamaga, LLP  
40 Westminster Street, Suite 700  
Providence, RI 02903  
Tel: (401) 331-3400  
Fax: (401) 331-3440  
Email: rratcliffe@rhbglaw.com  
jbiolchini@rhbglaw.com

J. Andrew Gipson, Esq.  
Jones Walker, LLP  
190 E. Capitol Street, Suite 800 (39201)  
P. O. Box 427  
Jackson, MS 39205-0427  
Tel.: (601) 949-4789  
Fax: (601) 949-4804  
Email: agipson@joneswalker.com

4. Questions concerning the ongoing operations of enTouch Wireless following certification should be directed to:

Ms. Kimberley Lehrman, President & Chief Marketing Officer  
Boomerang Wireless, LLC  
955 Kacena Road, Suite A  
Hiawatha, IA 52233  
Tel.: (319) 573-1678  
Fax: (319) 294-6081  
Email: klehrman@readywireless.com

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<sup>3</sup> Boomerang has ETC applications currently pending before the state commissions in Hawaii, Massachusetts, New Jersey, New Mexico, Pennsylvania, and South Dakota. In addition, Boomerang has a pending petition before the FCC for granting ETC designations in Alabama, Connecticut, Delaware, The District of Columbia, Florida, Maine, New Hampshire, New York, North Carolina, Tennessee and Virginia, WC Docket No. 09-197 (filed Dec. 29, 2010).



## **BACKGROUND**

5. As a result of the work and cooperation of federal and state regulators, the FCC has adopted a number of cost recovery policies and mechanisms designed to promote and maintain universal service. One key component of universal service is the availability of subsidies from the federal Universal Service Fund (“USF”), created by the Act. The USF was created, in part, to provide support to qualifying low-income communications end-users such as those serviced by enTouch Wireless. Mechanisms were also established to moderate the amount of costs to be recovered through basic, recurring charges to low-income users, thereby assisting efforts to maintain reasonable basic rate levels. Only a “common carrier” receiving designation as an ETC under 47 U.S.C. § 214 is eligible to receive subsidies from the federal USF. Wireless carriers are common carriers under federal law.<sup>4</sup> Common carriers that provide services consistent with the requirements of Section 214(e) may be deemed ETCs.<sup>5</sup> Section 214(e)(2) of the Act<sup>6</sup> provides that:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

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<sup>4</sup> 47 U.S.C. § 332(c)(1).

<sup>5</sup> 47 U.S.C. § 214(e)(6) provides that wireless carriers not otherwise subject to state commission jurisdiction shall be designated as ETCs if they meet the requirements of 47 U.S.C. § 214(e)(1) consistent with applicable federal and state law.

<sup>6</sup> 47 U.S.C. § 214(e)(2).

Section 214(e)(1) of the Act<sup>7</sup> provides:

A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received—

(A) offer the services that are supported by Federal universal service support mechanisms under section 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefor using media of general distribution.

6. The FCC has promulgated rules governing ETC designations, set forth at 47 C.F.R. § 54.101, §§ 54.201-203, and §§ 54.205-207 (the "FCC Rules") to establish various requirements for carriers to obtain ETC status. Applicants seeking ETC status in Rhode Island must address and satisfy each of the ETC designation criteria under the FCC Rules.

7. Pursuant to 47 U.S.C. § 214(e)(2), the Commission has the statutory authority to designate a common carrier as an ETC that offers the services supported by federal Universal Service Fund support mechanisms and advertises "the availability of such services and the charges therefore using media of general distribution."<sup>8</sup>

8. enTouch Wireless is a common carrier and reseller of commercial mobile radio service, and will offer all of the services and functionalities detailed in Section 54.101(a) of the FCC Rules and will provide competitive wireless services throughout its proposed Service Area through resale of other carrier's services. The provision of services through resale of other carrier's services will ensure that enTouch Wireless can provide services to customers throughout the Service Area.<sup>9</sup> As discussed in subsequent sections of this Application, enTouch

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<sup>7</sup> 47 U.S.C. § 214(e)(1).

<sup>8</sup> 47 C.F.R. § 54.201(d)(2).

<sup>9</sup> 47 C.F.R. § 54.101(a).

Wireless has filed and received approval of its Compliance Plan with the FCC. Additionally, enTouch Wireless will advertise the availability of such services and the charges for these services using media of general distribution and commits to continue to advertise the availability of its Lifeline program.

9. Further, as shown herein, enTouch Wireless meets the additional requirements set forth in the FCC Rules for obtaining ETC designation for purposes of receiving Lifeline funding support:<sup>10</sup>

(a) Certification of enTouch Wireless' compliance with the service requirements applicable to the support that it receives;

(b) Demonstration of enTouch Wireless' ability to remain functional in emergency situations, including a demonstration of possession of reasonable amount of back-up power to ensure functionality without an external power source, and ability to reroute traffic around damaged facilities, and capability of managing traffic spikes resulting from emergency situations;

(c) Demonstration that enTouch Wireless satisfies the applicable consumer protection and service quality standards;<sup>11</sup>

(d) Demonstration of enTouch Wireless' financial and technical capability of providing the Lifeline service in compliance with subpart E of the FCC's rules and regulations.<sup>12</sup>

(e) Submission of information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of

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<sup>10</sup> 47 C.F.R. § 54.202.

<sup>11</sup> For wireless applicants compliance with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service satisfies this requirement.

<sup>12</sup> 47 C.F.R. §§ 54.401 to 422.

minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan; and

(f) Demonstration that ETC designation is in the public interest.

10. Finally, designation of enTouch Wireless as an ETC on a wireless basis is in the public interest of the State of Rhode Island and its low-income telecommunications end-users. Upon designation as an ETC, enTouch Wireless will make Lifeline service available to qualifying customers in the Service Area pursuant to the guidelines and requirements of the universal service program and 47 C.F.R. § 54.202.

**ENTOUCH WIRELESS MEETS THE REQUIREMENTS FOR DESIGNATION AS AN  
ETC TO SERVE DESIGNATED AREAS IN RHODE ISLAND**

11. As demonstrated below, enTouch Wireless meets the requirements for ETC designation by the Commission pursuant to Section 214(e)(2) of the Act.<sup>13</sup> In addition, enTouch Wireless complies with the standards established by the FCC for determining whether applicants for ETC status serve the public interest.<sup>14</sup>

12. The Commission has jurisdiction to designate enTouch Wireless as an ETC. Pursuant to the provisions of Section 214(e)(2) of the Act, state commissions, such as this Commission, have primary responsibility for the designation of eligible telecommunications carriers under Section 214(e)(2). As shown in this Application, enTouch Wireless meets the requirements for designation as an ETC in Rhode Island. The Commission may and should grant enTouch Wireless' application for ETC status.

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<sup>13</sup> 47 U.S.C. § 214(e)(2).

<sup>14</sup> See Federal-State Joint Board on Universal Service, *Report and Order*, CC Docket No. 96-45, 20 FCC Rcd 6371, ¶ 40-43 (Rel, March 17, 2005).

13. enTouch Wireless has the financial and technical capability to provide Lifeline service. As part of the 2012 Lifeline Reform Order, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.<sup>15</sup>

14. enTouch Wireless generates revenues from non-Lifeline services and has access to capital from its investors. Boomerang, together with its parent and sister companies, currently provides prepaid wireless services to more than 230,000 subscribers, including more than 50,000 retail customers. Consequently, the Company has not relied, and will not be relying exclusively on Lifeline reimbursement for its operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

15. enTouch Wireless attaches hereto as **Exhibit “C”** a current list of its officers, along with biographical information for each, showing that it has the expertise necessary to provide the services specified herein.

16. enTouch Wireless will offer all required services and functionalities. Section 214(e)(1)(A) of the Act<sup>16</sup> requires an ETC to offer the services that are supported by federal universal service support mechanisms under section 254(c). As published in the Federal Register on May 24, 2016 pursuant to the Lifeline Modernization Order, the FCC amended section 54.101(a) of its rules to add broadband service as a supported service as follows:

§ 54.101 Supported services for rural, insular and high cost areas.

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<sup>15</sup> In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6 2012) (“2012 Lifeline Reform Order”).

<sup>16</sup> 47 U.S.C. § 214(e)(1).

(a) *Services designated for support.* Voice telephony services and broadband service shall be supported by federal universal service support mechanisms.

(1) Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part. Show citation box

(2) Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.  
...<sup>17</sup>

17. In addition, the FCC's 2016 Lifeline Order established certain minimum service standards applicable to voice telephony.<sup>18</sup> With respect to the mobile voice services to be provided by the Company, these minimum service standards are as follows:

- (3) The minimum service standard for mobile voice service will be:
- (i) From December 1, 2016, until November 30, 2017, 500 minutes;
  - (ii) From December 1, 2017, until November 30, 2018, 750 minutes; and

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<sup>17</sup> Federal Communications Commission Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund; Final Rule, 81 Fed. Reg. 100, 33088-89 (May 24, 2016) (to be codified at 47 C.F.R. § 54.101(a)).

<sup>18</sup> Id. at 33091-92 (to be codified at 47 C.F.R. § 54.408).

(iii) On and after December 1, 2018, the minimum standard will be 1000 minutes.<sup>19</sup>

18. Upon designation as an ETC in Rhode Island, and consistent with state and federal policies favoring universal service, enTouch Wireless will offer voice telephony services as required under Section 54.101 of the FCC Rules. The 500 Minute and Tribal 1100 Free Unit Lifeline plans offered by enTouch Wireless already meet the minimum service standards applicable to voice telephony services, though not required until December 1, 2016. The Company is in the process of developing its expanded broadband products and will supplement this Application prior to December 1, 2016 to update its Lifeline plans with broadband components meeting the minimum service requirements applicable to broadband internet access services under the 2016 Lifeline Order. Accordingly, enTouch Wireless will meet by December 1, 2016 the minimum service standards applicable to voice telephony services or broadband internet access services as described in Section 54.408 as published in the Federal Register on May 24, 2016.

19. The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and enhanced 911 (“E911”) where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission’s forbearance grant conditions relating to the provision of 911 and E911 services and handsets. enTouch Wireless also commits to remit 911 revenues to local authorities. The Company commits to pay in a timely manner all

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<sup>19</sup> Id.

applicable federal, state and local regulatory fees, including but not limited to universal service and E911 fees.<sup>20</sup>

20. Consistent with clarifications made by the FCC under the 2016 Lifeline Order, enTouch Wireless will not be required to offer toll limitation service (“TLS”), because the Company, like most wireless carriers, does not distinguish between toll and non-toll calls in the pricing of the service.<sup>21</sup>

21. enTouch Wireless will provide wireless service through resale. Under Section 214(e)(1)(A) of the Act, an ETC must offer the services supported by federal universal service support mechanisms throughout its Service Area “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”<sup>22</sup> In its 2012 Lifeline Reform Order, the FCC decided to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC’s compliance with certain 911 requirements and the ETC’s filing with and approval by the FCC of a compliance plan describing the ETC’s adherence to certain protections prescribed by the FCC (“Blanket Forbearance”).

22. enTouch Wireless seeks limited ETC designation in Rhode Island to participate in the Lifeline program and has opted to pursue Blanket Forbearance. On August 8, 2012, the FCC approved the Company’s Compliance Plan (“Compliance Plan”). A copy of the approved

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<sup>20</sup> See TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition, FCC Docket No. 96-45 (May 3, 2010).

<sup>21</sup> See Federal Communications Commission Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund; Final Rule, 81 Fed. Reg. 100, 33090 (May 24, 2016) (to be codified at 47 C.F.R. § 54.401(a)(2)).

<sup>22</sup> 47 U.S.C. § 214(e)(1)(A).



Compliance Plan is attached hereto as **Exhibit “D.”** enTouch Wireless seeks designation as an ETC by the Commission on an expedited basis in light of the FCC’s approval of the Compliance Plan.

23. enTouch Wireless, in its provision of wireless services, will offer resold services which the Company will obtain from its underlying wireless providers, Sprint, Verizon, AT&T as well as other GSM carriers. This extended footprint through multiple carriers allows enTouch Wireless to provide expanded coverage throughout otherwise underserved markets as shown in **Exhibit “A,”** attached.

24. enTouch Wireless has developed and implemented a diverse network that delivers all of the services required by the Federal Lifeline guidelines, and employs Verizon, Sprint, AT&T as well as other GSM carrier networks to ensure ubiquitous coverage. Additionally, enTouch Wireless operates a network data facility located in Marion, Iowa, which is on line with enTouch Wireless’ remote call authorization array located at 630 E. Government Street, Pensacola, Florida 32502, and its network switch platform located at 5500 REC Drive, Marion, Iowa 52302. All wireless voice traffic is monitored and gains network authorization/access from enTouch Wireless’ call authorization platform on a per call basis. This same intelligent calling platform is used to transmit calls to the underlying carrier network for call completion, as well as communication to enTouch Wireless’ IVR platform. International long distance, operator services, and directory services traffic passes through the enTouch Wireless network system.

25. Through its service arrangements, enTouch Wireless is able to offer all of the services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC Rules, throughout its Service Area.

26. enTouch Wireless will also advertise the availability of the supported services as required by the FCC. The FCC adopted specific requirements for Lifeline advertising in its 2012 Lifeline Reform Order with which the Company will comply.<sup>23</sup> enTouch has developed clear and transparent methods of advertising as required by the 2012 Lifeline Reform Order, to include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; (5) the program is limited to one discount per household; (6) documentation necessary for enrollment; (7) enTouch Wireless' name (the ETC); (8) notice 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; and (9) details of the Lifeline service offerings.<sup>24</sup> These or similar statements will be included in print, audio, video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's Rhode Island-specific application forms and certification forms.<sup>25</sup> This includes the Company's website and outdoor signage.<sup>26</sup> See **Exhibit "E"** for enTouch Wireless's Rhode Island-specific application and certification forms.

27. enTouch Wireless is fully prepared to and will comply with federal requirements that it advertise the availability of its services throughout its Service Area using media of general distribution.<sup>27</sup> enTouch Wireless further commits that it will also publicize the availability of

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<sup>23</sup> 2012 Lifeline Reform Order at ¶¶ 275-82.

<sup>24</sup> 2012 Lifeline Reform Order at ¶ 275.

<sup>25</sup> Id.

<sup>26</sup> Id.

<sup>27</sup> 47 C.F.R. § 54.201(d)(2).

Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.<sup>28</sup> enTouch Wireless specifically targets its advertising so as to reach its intended market base of low-income consumers who otherwise would be without service, or unaware of the program's availability and benefits. Accordingly, more low-income Rhode Island residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to enTouch Wireless' service. A sample of enTouch Wireless' updated planned advertising is attached hereto as **Exhibit "F."**

28. As a designated ETC in Rhode Island, enTouch Wireless will annually notify in writing each of its existing customers residing in the Service Area of the availability of federal Lifeline and Tribal Lifeline assistance programs pursuant to the FCC Rules. enTouch Wireless will also provide new customers in the Service Area with written notification of Lifeline and Tribal Lifeline assistance programs within 30 days after receiving telecommunications services.

#### **ADDITIONAL ELIGIBILITY CRITERIA**

29. enTouch Wireless is committed to providing service in Rhode Island. enTouch Wireless not only commits to provide service throughout its Service Area, but also commits to provide universal service in a timely manner to all customers who make a reasonable request for service pursuant to the FCC Rules. If designated as a wireless ETC, enTouch Wireless will provide service throughout its Service Area through the resale of services. enTouch Wireless commits to providing service on a timely basis to requesting customers within the Service Area where the underlying network already passes the potential customer's premises. If the requesting customer is within the Service Area but outside enTouch Wireless' existing network coverage,

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<sup>28</sup> 47 C.F.R. §§ 54.405(b).

enTouch Wireless will provide service within a reasonable period of time if such service does not impose excessive or unreasonable cost.

30. Further, under the FCC Rules an ETC applicant must demonstrate its ability to remain functional in emergency situations.<sup>29</sup> Since enTouch Wireless is providing service to its customers through the use of facilities obtained from other carriers it is able to provide to its customers the same ability to remain functional in emergency situations as currently provided by the carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, re-routing of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Facilities owned by enTouch Wireless are capable of remaining fully functional with generator back-up as described above.

31. Pursuant to FCC regulations, enTouch Wireless will comply with the consumer protection standards set by the FCC, including:

(a) Customer Proprietary Network Information - enTouch Wireless will satisfy all consumer privacy protection standards as provided in 47 C.F.R. § 64, Subpart U as applicable and will protect Customer Proprietary Network Information (“CPNI”) as required by state and federal law and will certify compliance with the same on an annual basis; and

(b) Consumer Code for Wireless Service - enTouch Wireless certifies that it will comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3).

32. As a reseller of other carriers’ wireless services, enTouch Wireless is able to offer service of the same quality and reliability as the underlying vendors. enTouch Wireless cannot

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<sup>29</sup> 47 C.F.R. § 54.202(a)(2).

guarantee that customers will never experience service disruptions, however, enTouch Wireless' underlying carrier agreements allow its service to be as reliable as any other wireless service that must deal with atmospheric and other conditions that sometimes result in dropped calls.

**DESIGNATION OF ENTOUCH WIRELESS AS AN ETC IN CERTAIN EXCHANGES  
WITHIN THE STATE OF RHODE ISLAND SERVES THE PUBLIC INTEREST**

33. Upon designation enTouch Wireless will provide competitive wireless services throughout its Service Area, including certain tribal areas, within the State of Rhode Island. enTouch Wireless is a reseller of commercial mobile radio service, and will offer all of the services and functionalities detailed in Section 54.101(a) of the FCC Rules and will provide competitive wireless services throughout its Service Area through resale of other carriers' services. The provision of services through resale of other carriers' services will ensure that enTouch Wireless can provide services to customers throughout the Service Area.<sup>30</sup>

34. Wireless ETC's *per se* promote the public interest. The FCC has determined that while "[d]esignation of competitive ETCs promotes and benefits consumers...by increasing customer choice," designation must include "an affirmative determination that such designation is in the public interest regardless of whether the applicant seeks designation in an area served by a rural or nonrural carrier."<sup>31</sup> In areas served by nonrural ILECs, the Act does not require a separate public interest finding. The FCC has previously held that designating a competitor as an ETC in areas served by nonrural ILECs is *per se* in the public interest.<sup>32</sup>

35. enTouch Wireless submits that the public interest benefits of designating enTouch Wireless as an ETC include 1) a larger local calling area and expanded coverage area via

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<sup>30</sup> 47 C.F.R. § 54.101(a).

<sup>31</sup> See Federal-State Joint Board on Universal Service, 20 FCC Rcd 6371, ¶ 42 (2005).

<sup>32</sup> See *Cellco Partnership*, 16 FCC Rcd, at 45.

multiple underlying carriers (as compared to traditional wireline carriers and single wireless carriers); 2) the convenience, portability, and security afforded by mobile telephone service; 3) the opportunity for customers to control cost by receiving a pre-set amount of flat-rate monthly airtime; 4) the ability to purchase additional low-cost usage at multiple convenient locations in the event that included usage has been exhausted; 5) the ability of users to use the supported service to send and receive “SMS” or text messages as well as the option to send data and access the public internet; 6) 911 and, where available, enhanced 911 service in accordance with current FCC requirements; and 7) outreach and service to potentially unserved or underserved Native American populations residing on tribal lands. In addition, the inclusion of domestic telephone toll calling as a part of enTouch Wireless’ flat-rate wireless offering allows consumers to avoid the risks of becoming burdened with significant and unexpected per-minute charges for domestic telephone toll and overage charges. These per-minute overruns form the basis of a substantial number of consumer complaints to state and federal regulators. Accordingly, enTouch Wireless’ offerings will help to reduce this burden on public utility regulatory boards by obviating the cause for such complaints.

36. The FCC has also identified factors that are to be considered in determining whether designation of additional ETCs will serve the public interest and whether the benefits of an additional ETC would outweigh potential harms. These factors include: 1) the benefits of increased competitive choice; and 2) the unique advantages of the applicant company’s service offerings.<sup>33</sup> enTouch Wireless affirms that its ETC designation meets these criteria as described below.

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<sup>33</sup> 47 U.S.C. § 54.202(c).

*The Benefits of Increased Competitive Choice*

37. The FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of telecommunications services they provide.<sup>34</sup> This is of particular interest in cases where wireless providers like enTouch Wireless seek to provide service as an alternative to the ILEC. In the *Highland Cellular* case, the FCC recognized and affirmed that some households may not have access to the public switched network as provided by the ILEC.<sup>35</sup> The availability of a wireless competitor benefits all consumers. The availability of a wireless competitor benefits consumers who routinely drive long distances to attend work or school or to accomplish everyday tasks such as shopping or attending community and social events. The wireless service offered by enTouch Wireless will provide these consumers with a convenient and affordable alternative to traditional telecommunications service that can be used while at home and away from home.

38. Added together, enTouch Wireless expects these additional competitive advantages to create an atmosphere that will cause many qualified consumers, at their option, to select enTouch Wireless' low-income wireless Lifeline service in lieu of the more traditional wireline or wireless services.

39. Designation of enTouch Wireless as an ETC also creates competitive pressure for other wireline and wireless providers within the proposed service areas. In order to remain competitive in low-income markets, therefore, all carriers will have greater incentives to improve networks, increase service offerings and lower prices. This results in improved consumer

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<sup>34</sup> See e.g. Specialized Common Carrier Services, 29 FCC2d 870 (1971).

<sup>35</sup> Federal-State Joint Bd. on Universal Serv., Highland Cellular, Inc., *Memorandum Opinion and Order*, 19 F.C.C.R. 6422 (2004).

services and, consistent with federal law, benefits consumers by allowing enTouch Wireless to offer the services designated for support at rates that are “just, reasonable, and affordable.”<sup>36</sup>

*Unique Advantages of enTouch Wireless’ Service Offerings*

40. enTouch Wireless will offer a unique, easy to use, competitive and highly affordable wireless telecommunications service, which it will make available to eligible consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional services. enTouch Wireless’ standard customer terms and conditions in connection with its wireless service offering can be found at [https://www.entouchwireless.com/pages/cell\\_phone\\_termservice](https://www.entouchwireless.com/pages/cell_phone_termservice).

41. enTouch Wireless will announce and advertise telecommunications services as an ETC in its Service Area and will publicize the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Rhode Island residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to enTouch Wireless’ service. A sample of enTouch Wireless’ planned advertising is attached hereto as **Exhibit “F.”**

42. enTouch Wireless will provide universal service as an ETC in all of its Service Area.

43. enTouch Wireless offers a local usage plan comparable to that offered by the ILEC in the Service Area for which it seeks designation.

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<sup>36</sup> 47 U.S.C. § 254(b)(1).



*enTouch Wireless Prepaid Wireless Lifeline Plans*

44. The following voice telephony service plan information further demonstrates the public interest.

45. enTouch Wireless will, prior to December 1, 2016, offer qualified consumers their choice of one of three Lifeline Service Plans. Lifeline is a component of one of four separate federal universal service fund mechanisms<sup>37</sup> known as the “low-income” support mechanism”<sup>38</sup> and is defined in 47 C.F.R. § 54.401 as “a retail local service offering” “available only to qualified low-income consumers” “for which qualifying low-income consumers pay reduced charges as a result of application of the Lifeline support amount” that includes the services or functionalities enumerated in § 54.401, which enTouch Wireless will use to “[m]ake available Lifeline service...to qualifying low-income consumers”.<sup>39</sup>

46. Prior to December 1, 2016, enTouch Wireless’ planned wireless Lifeline offering will provide eligible customers with the following alternative Lifeline plans: (1) **500 Voice Minute Plan**; (2) **250 Free Monthly Unit Plan** (base plan); and (3) **Tribal 1100 Free Unit Plan** (“Tribal base plan). Boomerang’s Lifeline 250 Free Monthly Unit Plan and Tribal 1100 Free Unit Plan Service Plans are base plans for Lifeline Upgrade Data Plans with multiple options for acquiring a device. The 500 Voice Minute and Tribal 1100 Free Unit Lifeline plans offered by enTouch Wireless already meet the minimum service standards applicable to voice telephony services, though not required until December 1, 2016. The Company is in the process of developing its expanded broadband products and will supplement this Application

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<sup>37</sup> 47 C.F.R. § 54.8(a)(1); See “Definitions” at second sentence.

<sup>38</sup> 47 C.F.R. § 54.8(a)(1) ); See “Definitions” at first sentence.

<sup>39</sup> 47 C.F.R. §§ 54.401(a)(1), 54.401(a)(2), 54.401(a)(3), 54.405(a).

prior to December 1, 2016 to update its Lifeline plans with broadband components meeting the minimum service requirements applicable to broadband internet access services under the 2016 Lifeline Order. Accordingly, enTouch Wireless will meet by December 1, 2016 the minimum service standards applicable to voice telephony services or broadband internet access services as described in Section 54.408 as published in the Federal Register on May 24, 2016.

47. The **500 Minute Plan**: This plan offers 500 voice minutes, 100 texts, and 10MB of data per month. Customer must provide their own device. There is no device available with this offer, nor are discounts or promotions for devices available with this plan. Lifeline minutes, texts, and data are automatically posted each month on the Lifeline customer's service date. There is no rollover of minutes, texts or data, and any unused minutes, texts or data will expire on the monthly service date.

48. **250 Free Units Plan**: (Base plan) 250 units and 10mb of data per month. This plan offers 250 units (where 1 minute equals 1 unit and 1 text equals 1 unit), for voice and text. Lifeline free minutes are automatically posted each month on the Lifeline customer's service. There are no rollover of minutes. The **Lifeline Upgrade Data Plan**: This is available to a subscriber with the 250 Free Units Plan. This plan includes 250 units per month (without rollover) of the 250 Free Units Plan (where 1 minute equals 1 unit and 1 text equals 1 unit), and adds 250 MB of data per month. The plan differs depending on the device: (1) for customers who bring their own device, they will pay a \$5 line fee for 90 days of service; (2) for customers who wish to purchase an entry-level smart phone from Boomerang, they can pay \$25 for the phone, and the \$5 fee will be waived for the first 90 days; after the first 90 days, the \$5 fee for 90 days will apply; (3) for customers who wish to purchase an iPhone 4 or equivalent, they can pay \$50 for the phone, and the \$5 fee will be waived for the first 90 days; after the first 90 days, the

\$5 fee for 90 days of service will apply. Should a customer not wish to renew on the 90-day plan for \$5, the plan will convert to the 250 Free Minute plan. The 250 Free Minute plan will provide 250 units per month and 10 MB of data per month.

49. Boomerang will offer qualified consumers who are eligible for the tribal subsidy the **Tribal 1,100 Free Unit Plan** (base plan), which is the Tribal base plan. This plan offers 1100 units per month for voice and text and 100mb of data per month. The 1,100 units (where 1 minute equals 1 unit and 1 text equals 1 unit) are for voice and text. Lifeline free units are automatically posted each month on the Lifeline customer's service. There are no rollover of units, texts or data. This plan is only available to eligible applicants residing on Federally Recognized Tribal lands. The additional minutes that exceed those offered in the 250 Free Unit Plan (described above) is due to the additional \$25.00 per month in Lifeline support to qualifying low-income consumers living on Tribal lands. The **Tribal Lifeline Upgrade Data Plan**: This plan is for eligible customers that reside on Tribal lands and have the Tribal 1100 Free Unit Plan base plan. This plan includes the 1100 units (voice or text) without rollover of the Tribal 1100 Free Unit Plan, as well as 500 MB of data. The plan also differs depending on the device: (1) customers can pay \$5 for 90 days of service, and will receive a free entry-level smartphone; or (2) customers can pay a one-time \$25 fee for an iPhone 4 or equivalent, with the \$5 line fee waived for the first 90 days, and a \$5 fee for 90 days after that. Also for this Tribal plan, if a customer chooses not to renew the paid plan, he or she will be converted to a Tribal 1,100 Free Minute plan. The Tribal 1,100 Free Minute plan will provide 1,100 units and 100 MB of data per month.

50. enTouch Wireless will offer qualified consumers who are eligible for the tribal subsidy the Tribal Lifeline Service Plan described above. Lifeline is a component of one of four

separate federal universal service fund mechanisms<sup>40</sup> known as the “low-income” support mechanism”<sup>41</sup> and is defined in 47 C.F.R. § 54.401 as “a retail local service offering” “available only to qualified low-income consumers” “for which qualifying low-income consumers pay reduced charges as a result of application of the Lifeline support amount” that includes the services or functionalities enumerated in § 54.401, which enTouch Wireless will use to “[m]ake available Lifeline service...to qualifying low-income consumers”.<sup>42</sup>

51. enTouch Wireless has a proven track record of tribal engagement and service to Native American populations residing on tribal lands. The Company currently serves tribes in the states of Arizona, Iowa, Kansas, Michigan, Mississippi Minnesota, North Dakota, Oklahoma, Washington and Wisconsin. With its extensive experience serving tribal communities in other states, enTouch Wireless is well aware of and attuned to the telecommunications needs of Native American populations throughout the continental United States. Upon designation, enTouch Wireless is prepared and committed to engage with these Tribes to meet their tribal residents’ wireless telecommunication Lifeline needs. enTouch Wireless submits that these factors further demonstrate the public interest will be served by designation of enTouch Wireless as an ETC within the requested Rural Service Area.

52. All low-income universal service support will be used to allow enTouch Wireless to provide the service with no monthly recurring charge, thus ensuring that consumer receives 100% of all universal service support funding for which enTouch Wireless will seek reimbursement. In the event that all airtime has been used, Lifeline customers on any plan, both

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<sup>40</sup> 47 C.F.R. § 54.8(a)(1); See “Definitions” at second sentence.

<sup>41</sup> 47 C.F.R. § 54.8(a)(1) ); See “Definitions” at first sentence.

<sup>42</sup> 47 C.F.R. §§ 54.401(a)(1), 54.401(a)(2), 54.401(a)(3), 54.405(a).

Tribal and non-Tribal, will also have the capability of purchasing additional airtime to supplement their Lifeline plans in the various denominations.<sup>43</sup> enTouch Wireless will not deduct airtime minutes for calls by Lifeline customers with service addresses for Lifeline service in Rhode Island to enTouch Wireless' Customer Service (via 611 from their Lifeline phone or other designated toll-free access dialing from any other phone), and calls from enTouch Wireless' Customer Service to such Lifeline customers to address billing, customer care and customer service issues.

53. Airtime replenishment cards will be made available at many retail outlets frequented by low-income customers throughout the Service Area such as CVS, Dollar General, Walgreens, Seven-Eleven, Freds, Rite Aid, as well as from the Company's website. There are a hundred thousand retail locations across the country where Airfair and Get Ready airtime replenishment cards can be purchased.

54. The wireless plans will also include the following custom calling features:

- (a) Caller ID;
- (b) Call Waiting;
- (c) Call Forwarding;
- (d) 3-Way Calling; and
- (e) Voicemail.

55. Wireless handsets, when applicable, will be delivered at no charge to qualifying customers, service will be activated, and the requisite number of minutes will be added upon certification of the customer for Lifeline.

56. enTouch Wireless reiterates that it is applying for ETC designation solely for the purpose of providing Lifeline discounts to qualified low-income consumers and to seek reimbursement for the same and will not seek or accept high-cost support. Under the FCC Rules,

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<sup>43</sup> The additional airtime denominations on pages 22-23 of the Compliance Plan have been updated since the approval of the Compliance Plan in 2012.

an ETC applicant must submit a five-year plan that describes with specificity the proposed improvements or upgrades to the applicant's network on a wire-center-by-wire-center basis throughout its proposed Service Area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because enTouch Wireless seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline services to eligible customers, submission of a five-year network improvement plan is not required at this time. Since Lifeline support is designed to reduce the monthly cost of telecommunication services for eligible consumers, is distributed on a per-customer basis, and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low-income users, which is clearly in the public interest. In addition, designation of enTouch Wireless as an ETC will not pose any adverse effect in the growth in the high-cost portions of the USF, nor will it create or contribute to an erosion of high-cost funding from any rural or nonrural telephone company.

57. The FCC reaffirmed this position when it stated that "the potential growth of the fund associated with high-cost support distributed to competitive ETCs" is not relevant to carriers seeking support associated with the low-income program.<sup>44</sup>

58. The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the fund when it stated that "any increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible

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<sup>44</sup> Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005) ("TracFone Forbearance Order") at ¶ 17.

participation in the Lifeline program, furthering the statutory goal of providing access to low-income consumers.”<sup>45</sup>

59. It is also vital to recognize that in the case of Lifeline support, an ETC receives USF support *only* for the customers it obtains. In the scenario where a competitive ETC obtains a Lifeline customer from another ETC, only the “capturing” ETC provides Lifeline discounts and as a result, only the “capturing” ETC receives support reimbursement.

60. In addition, all providers are required to contribute a portion of the interstate revenues received from their customers to the Universal Service Fund. In accordance with current federal regulations, enTouch Wireless will make contributions based on that portion of its revenue that is determined to be interstate. As such, approving enTouch Wireless as an ETC will actually create contributions to the USF that were previously non-existent.

61. Designation of enTouch Wireless as an ETC benefits the public interest of low-income consumers throughout enTouch Wireless’ Service Area. Approval of enTouch Wireless’ ETC Application will serve the public interest by increasing participation of qualified consumers in the Lifeline program in the State of Rhode Island. It will also increase the number of carriers eligible for federal USF support, thereby proportionately increasing the amount of federal USF dollars available to Rhode Island consumers. Granting ETC status to enTouch Wireless will contribute to more Rhode Island residents receiving Lifeline, thereby increasing the amount of federal USF dollars flowing into and thereby benefiting Rhode Island residents. In short, Rhode Island residents will get more of their money back.

62. The Lifeline service offered by enTouch Wireless also provides important benefits that are especially needed by low-income Rhode Island residents in this time of

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<sup>45</sup> TracFone Forbearance Order, at ¶ 17.

economic uncertainty. Savings accounts, upon which many depend for emergencies and retirement, have significantly eroded. The availability of a mobile telephone will be critical to the efforts of the unemployed as they search for other employment opportunities. Without a regular paycheck, wireless telephone service would become a luxury beyond the means of many of those persons.

63. enTouch Wireless' Lifeline program will enable thousands of residents to obtain wireless service which would otherwise be unavailable to them. The economic circumstances indicate that low-income individuals, now more than ever, can greatly benefit from the advantages offered by enTouch Wireless' Lifeline service thus allowing those adversely impacted by the economy or job loss to have access to a free wireless service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

64. It is also a commonly accepted fact that in today's market, qualified Lifeline customers view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents, wherever they may be, allows a person seeking employment the ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers, regardless of location.

65. Finally, designation of enTouch Wireless as a wireless ETC will serve the public interest by furthering the extensive role that enTouch Wireless believes it will play in the provision of communications service to low-income consumers, transient users, and other consumers who, due to the restrictive credit criteria, deposit requirements, and long-term commitments of wireline and traditional wireless service providers, are without a viable alternative and are likely to remain so.



66. enTouch Wireless will comply with the uniform eligibility criteria established in new section 54.409 of the FCC Rules as amended by the 2016 Lifeline Order to require that the consumer's household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or the consumer, one or more of the consumer's dependents, or the consumer's household must receive benefits from one of several specified federal assistance programs.<sup>46</sup> Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new section 54.409(a)(2). In addition, the Company will confirm with the subscriber that he/she is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service. enTouch already participates in the National Lifeline Administrative Database ("NLAD") and will participate in the contemplated National Verifier system under the 2016 Lifeline Order. In addition to the eligibility criteria above, pursuant to Section 54.410, low-income residents of Tribal lands may self-certify as to their residency on Tribal lands.

67. enTouch Wireless will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the 2016 Lifeline Order, together with any additional state certification requirements.<sup>47</sup> Consistent with federal requirements, enTouch Wireless requires customers to certify at the time of service activation and annually thereafter that they: 1) are the head of

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<sup>46</sup> See Federal Communications Commission Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund; Final Rule, 81 Fed. Reg. 100, 33093 (May 24, 2016) (to be codified at 47 C.F.R. § 54.409(a)(2) (listing qualifying federal benefits to include Medicaid, SNAP, SSI, Federal Public Housing Assistance, or Veterans and Survivors Pension Benefit)).

<sup>47</sup> Id. at 33093-94 (to be codified at 47 C.F.R. § 54.410).

household; 2) participate in one of the state-approved means tested programs; 3) will be receiving Lifeline-supported services only from enTouch Wireless; 4) do not currently receive Lifeline support; and 5) will notify enTouch Wireless in the event that they no longer participate in the qualifying program.

68. If enTouch Wireless has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>48</sup> A demonstration of eligibility must comply with the annual verification procedures found in Section 54.410(f), including the submission of a certification form.<sup>49</sup>

69. Furthermore, enTouch Wireless commits to comply with the FCC's 60-day non-usage policy, as described in the Company's Approved Compliance Plan under current rules, and in the future as permitted under the 2016 Lifeline Order for activities such as completion of an outbound call or usage of data, purchase or minutes or data, and sending a text message to establish "usage."<sup>50</sup>

**ENTOUCH WIRELESS WILL COMPLY WITH  
ALL ANNUAL REPORTING REQUIREMENTS**

70. Consistent with the requirements of 47 C.F.R. § 54.422, enTouch Wireless will comply with federal annual reporting requirements, including the recent 2016 Lifeline Order's

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<sup>48</sup> 2012 Lifeline Reform Order at ¶ 143; 47 C.F.R. § 54.405(e)(1).

<sup>49</sup> 47 C.F.R. § 54.410 (effective April 2, 2012).

<sup>50</sup> See Federal Communications Commission Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund; Final Rule, 81 Fed. Reg. 100, 33091 (May 24, 2016) (to be codified at 47 C.F.R. § 54.407).

requirements to certify compliance with applicable minimum service standards by December 1, 2016 under 47 C.F.R. § 54.416.<sup>51</sup>

71. The proposed effective date of designation of enTouch Wireless as an ETC is thirty (30) days from the date of this Application or as soon as practicable.

WHEREFORE, premises considered, having demonstrated herein that enTouch Wireless satisfies all the conditions of eligibility necessary for designation as an ETC in Rhode Island, and having shown that the public interest and universal service interests of the telecommunications consumers of the State of Rhode Island, including tribal consumers, will be properly served, enTouch Wireless respectfully requests that the Commission promptly grant this Application and designate Boomerang Wireless, LLC d/b/a enTouch Wireless as a wireless eligible telecommunications carrier including tribal areas within the designated Service Area.

Respectfully Submitted,  
Boomerang Wireless LLC  
d/b/a enTouch Wireless  
By its Attorneys

Date: August 24, 2016

  
\_\_\_\_\_  
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and

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<sup>51</sup> Id. at 33094-95 (May 24, 2016) (to be codified at 47 C.F.R. §§ 54.416 and 422).

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**ATTESTATION**

STATE OF IOWA

COUNTY OF LINN

PERSONALLY came and appeared before me, the undersigned party in and for the jurisdiction aforesaid, the within named Kimberley Lehrman who after being duly sworn by me stated under oath as follows: that I am President of Boomerang Wireless, LLC d/b/a enTouch Wireless ("enTouch Wireless"); that I executed the foregoing pleading for and on behalf of enTouch Wireless; that I am authorized to execute and file said pleading; and that the matters and things set forth in said pleading are true and correct to the best of my knowledge, information and belief.

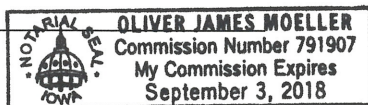


\_\_\_\_\_  
Kimberley Lehrman

SWORN TO AND SUBSCRIBED before me on this the 17 day of August, 2016.

  
NOTARY PUBLIC

My Commission Expires:



**Docket No. \_\_\_\_\_ – Boomerang Wireless, LLC d/b/a enTouch Wireless –  
ETC Designation Petition  
Service List**

**CERTIFICATION**

I hereby certify that on the 25<sup>th</sup> day of August, 2016, a true copy of the attached *Application of Boomerang Wireless, LLC d/b/a enTouch Wireless for Designation as a Federal Eligible Telecommunications Carrier in the State of Rhode Island for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households (Low Income Only)* was sent to the persons on the service list below by regular mail and via email at the addresses indicated.

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
Julia Redman-Carter Regulatory & Compliance Officer Boomerang Wireless, LLC d/b/a enTouch Wireness, LLC 955 Kacena Road, Suite A Hiawatha, IA 52233	<a href="mailto:jrcarter@readywireless.com">jrcarter@readywireless.com</a>	(319) 743-4640
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	<a href="mailto:lwold@riag.ri.gov">lwold@riag.ri.gov</a>	401-222-2424
	<a href="mailto:bkent@ripuc.state.ri.us">bkent@ripuc.state.ri.us</a>	
	<a href="mailto:jlanni@ripuc.state.ri.us">jlanni@ripuc.state.ri.us</a>	
	<a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
<b>File an original &amp; six (6) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:lmassaro@puc.state.ri.us">lmassaro@puc.state.ri.us</a>	401-780-2107
	<a href="mailto:cwilson@puc.state.ri.us">cwilson@puc.state.ri.us</a>	

  
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## **EXHIBITS**

- Exhibit “A” - Service Area
- Exhibit “B” - Articles of Organization
- Exhibit “C” - Officers
- Exhibit “D” - FCC Compliance Plan
- Exhibit “E” - Rhode Island-Specific Enrollment Form
- Exhibit “F” - Advertising



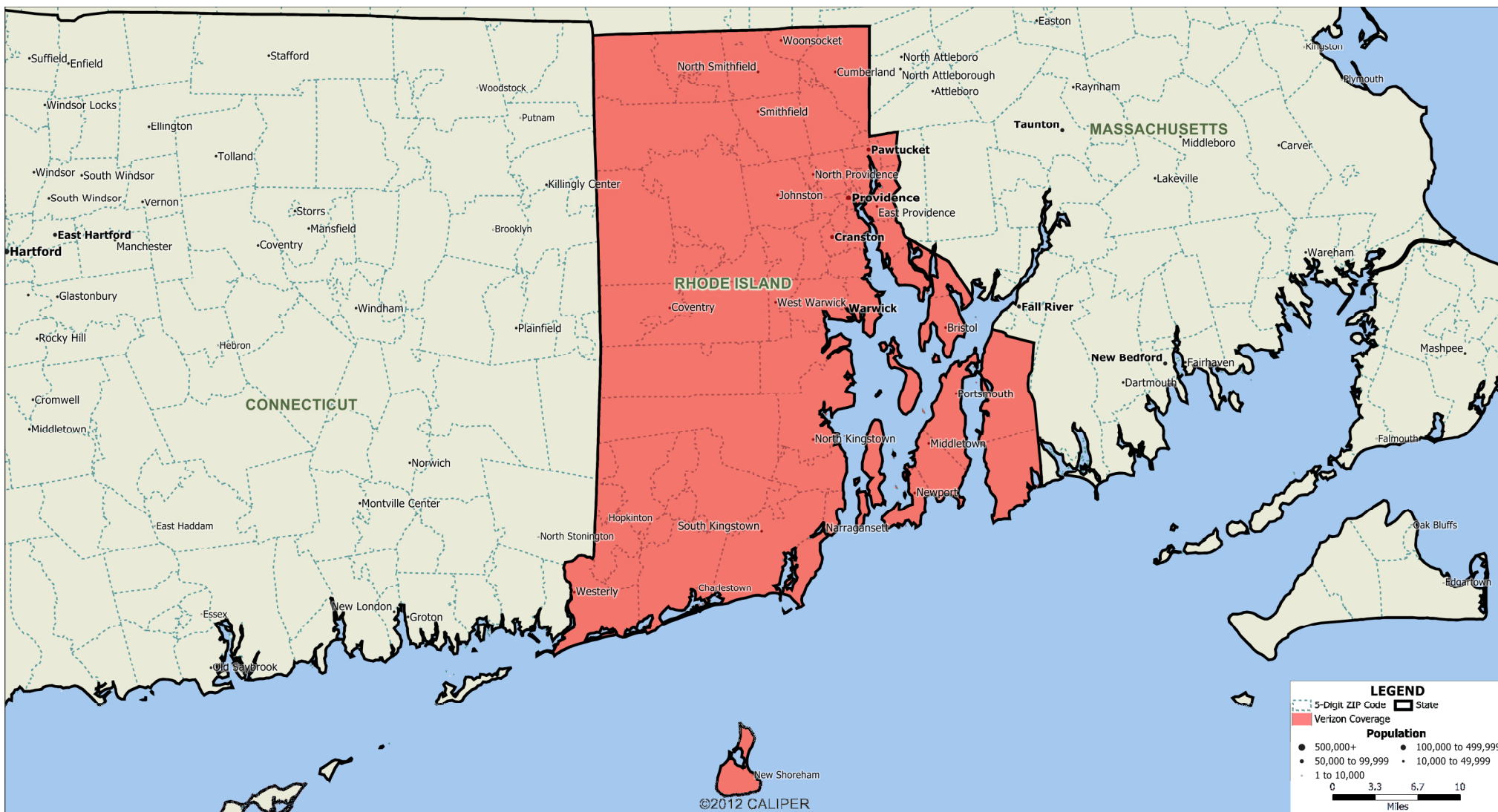
# Exhibit A

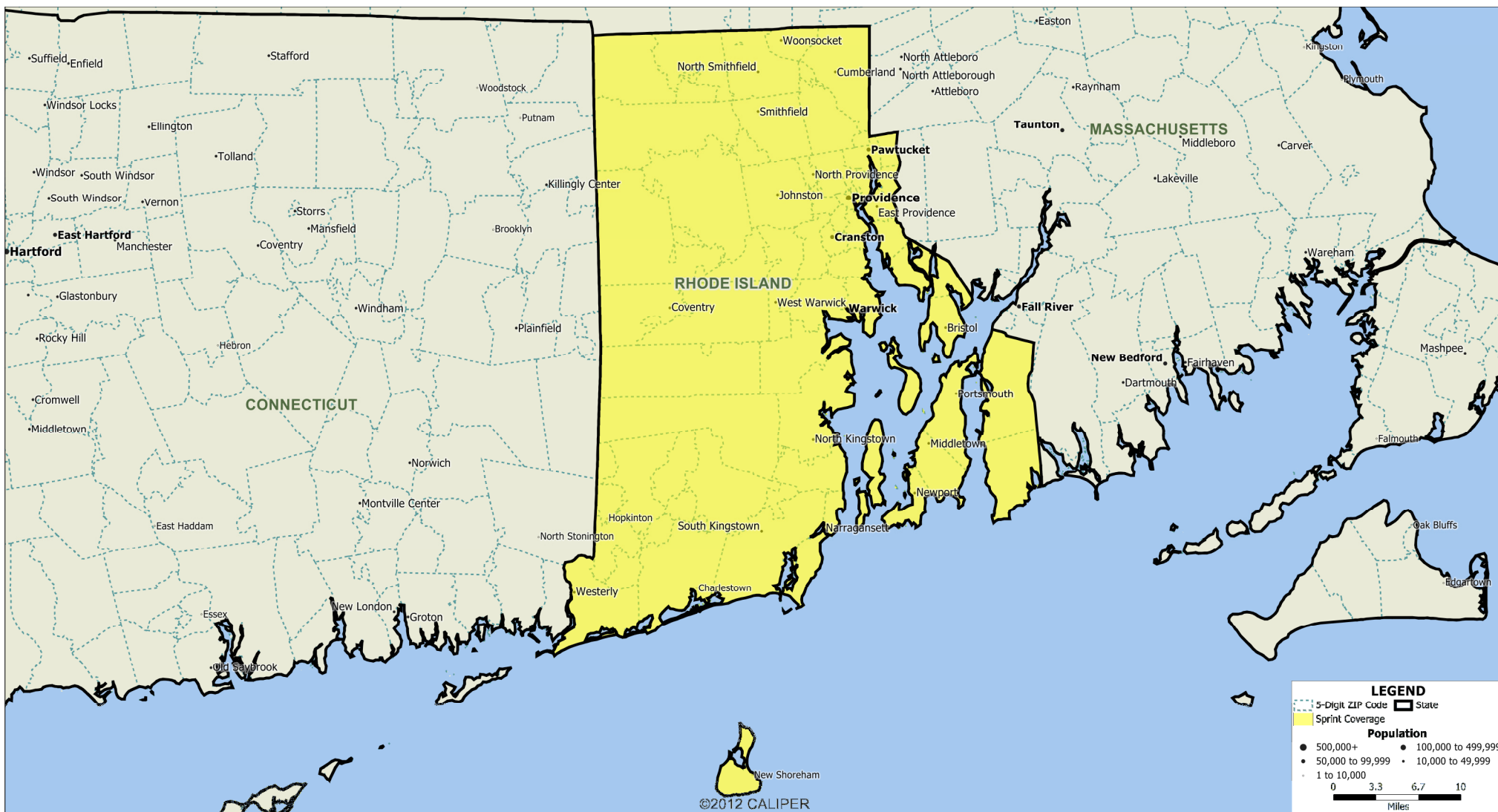


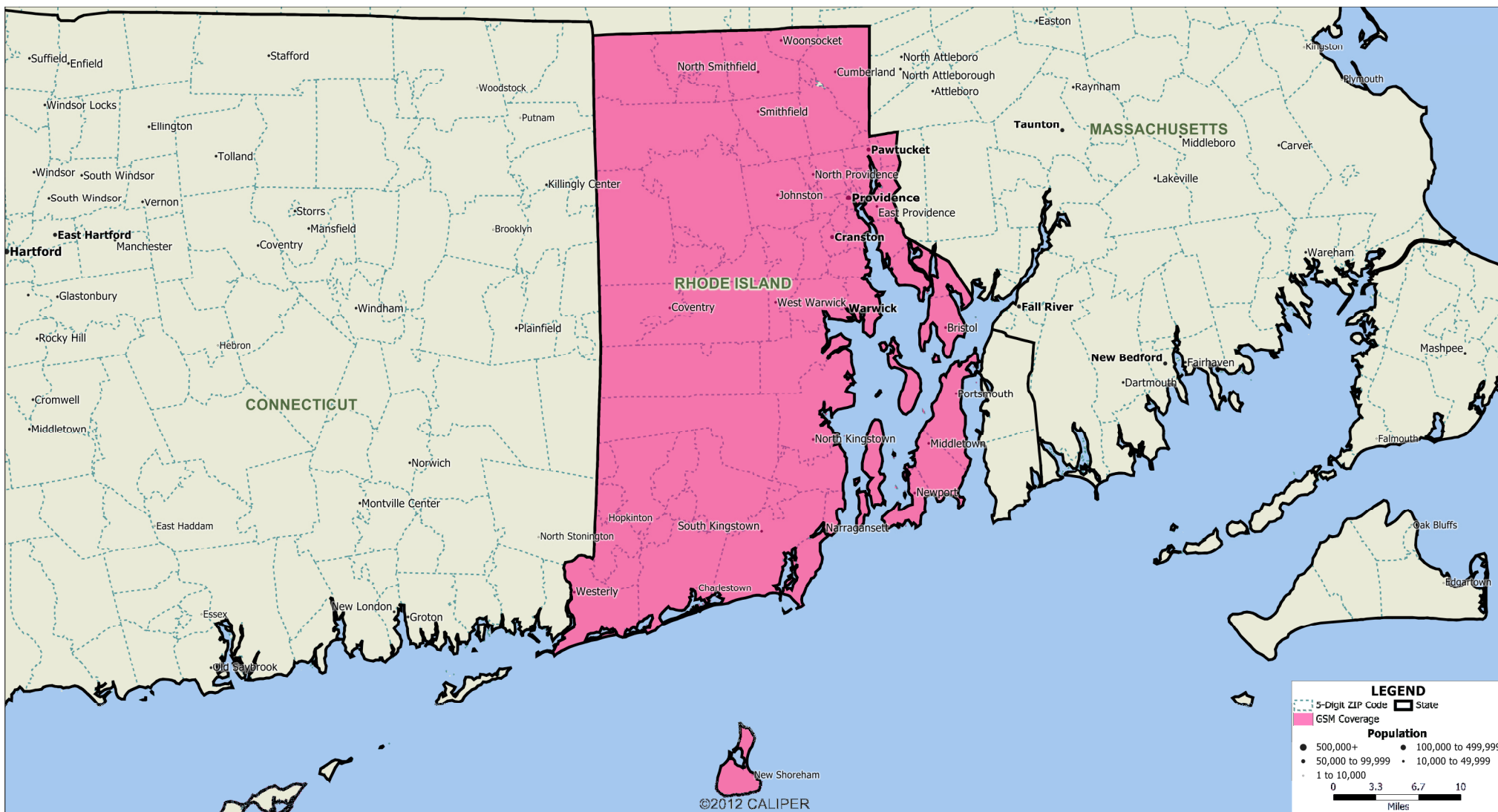
STATE	SHORT SWITCH	OCN_NAME	CATEGORY	RC ABBRE
RI	EPRVRINB	BANDWIDTH.COM CLEC, LLC - RI	CLEC	LTLCOMPTON
RI	NWPTRIEB	NECLEC, LLC	CLEC	LTLCOMPTON
RI	PRVDRI95	CONVERSENT COMMUNICATIONS OF RHODE ISLAND, LLC	CLEC	PAWTUCKET
RI	PRVDRI01	MCIMETRO ACCESS TRANSMISSION SERVICES LLC - RI	CLEC	LTLCOMPTON
RI	PRVDRI02	AT&T LOCAL	CLEC	PAWTUCKET
RI	PRVDRI03	PAETEC COMMUNICATIONS, INC. - RI	CLEC	PAWTUCKET
RI	PRVDRI04	YMAX COMMUNICATIONS CORP. - RI	CLEC	PAWTUCKET
RI	PRVDRI05	LEVEL 3 COMMUNICATIONS - RI	CLEC	LTLCOMPTON
RI	PRVDRI06	RNK, INC.	CLEC	LTLCOMPTON
RI	PRVDRI07	TELEPORT COMMUNICATIONS GROUP - RI	CLEC	LTLCOMPTON
RI	PRVDRI08	GLOBAL NAPS, INC. - RI	CLEC	LTLCOMPTON
RI	PRVDRI09	RNK, INC.	CLEC	PAWTUCKET
RI	PRVDRI10	CTC COMMUNICATIONS CORP. - RI	CLEC	LTLCOMPTON
RI	PRVDRI11	BROADVIEW NETWORKS, INC. - RI	CLEC	PAWTUCKET
RI	PRVDRI12	DSCI CORPORATION - RI	CLEC	PAWTUCKET
RI	PRVDRI13	CHOICE ONE COMMUNICATIONS OF RHODE ISLAND, INC.	CLEC	PAWTUCKET
RI	PRVDRI14	AT&T LOCAL	CLEC	BRISTOL
RI	PRVDRI15	NEUTRAL TANDEM-RHODE ISLAND, LLC - RI	CLEC	PROVIDENCE
RI	PRVDRI16	PAETEC COMMUNICATIONS, INC. - RI	CLEC	PROVIDENCE
RI	PRVDRI17	CCCRI, INC. DBA TOTAL CONNECT! - RI	CLEC	PROVIDENCE
RI	WRRNRIBO	KNOLOGY PROVIDER SOLUTIONS GROUP, INC. - RI	CLEC	WARREN
RI	WWWKRIDB	COX RHODE ISLAND TELECOM INC	CLEC	LTLCOMPTON
RI	EPRVRIEL	OMNIPOINT MIAMI E LICENSE, LLC	PCS	PAWTUCKET
RI	PRVDRI18	SPRINT SPECTRUM L.P.	PCS	PAWTUCKET
RI	PRVDRI19	METRO PCS, INC.	PCS	PAWTUCKET
RI	ASTNR1AN	VERIZON NEW ENGLAND INC.	RBOC	PAWTUCKET
RI	ASWYRIYB	VERIZON NEW ENGLAND INC.	RBOC	WESTERLY
RI	BLISRIOT	VERIZON NEW ENGLAND INC.	RBOC	BLOCK IS
RI	CNTNRIPH	VERIZON NEW ENGLAND INC.	RBOC	PROVIDENCE
RI	CNTYRIST	VERIZON NEW ENGLAND INC.	RBOC	COVENTRY
RI	CRLNRIMA	VERIZON NEW ENGLAND INC.	RBOC	CAROLINA
RI	EGRNRICH	VERIZON NEW ENGLAND INC.	RBOC	GREENWICH
RI	EPRVRINB	VERIZON NEW ENGLAND INC.	RBOC	PROVIDENCE
RI	GLCSRIWG	VERIZON NEW ENGLAND INC.	RBOC	SCITUATE
RI	HPVYRIMA	VERIZON NEW ENGLAND INC.	RBOC	HOPEVALLEY
RI	JMTWRINA	VERIZON NEW ENGLAND INC.	RBOC	JAMESTOWN
RI	LTCMRIWE	VERIZON NEW ENGLAND INC.	RBOC	LTLCOMPTON
RI	NKTRWRPH	VERIZON NEW ENGLAND INC.	RBOC	NO KINGSTN
RI	NPRVRIMS	VERIZON NEW ENGLAND INC.	RBOC	PROVIDENCE
RI	NRGNRIMA	VERIZON NEW ENGLAND INC.	RBOC	NARRAGNSTT
RI	NWPTRIBU	VERIZON NEW ENGLAND INC.	RBOC	NEWPORT
RI	PRVDRI01	VERIZON NEW ENGLAND INC.	RBOC	PROVIDENCE
RI	PRVDRI10	VERIZON NEW ENGLAND INC.	RBOC	PROVIDENCE
RI	PSCGRIPA	VERIZON NEW ENGLAND INC.	RBOC	PASCOAG
RI	PTMORIEM	VERIZON NEW ENGLAND INC.	RBOC	PORTSMOUTH
RI	PWTCRIHI	VERIZON NEW ENGLAND INC.	RBOC	PAWTUCKET
RI	RVSDRISO	VERIZON NEW ENGLAND INC.	RBOC	WARREN
RI	SCTTIRIS	VERIZON NEW ENGLAND INC.	RBOC	SCITUATE
RI	TVTNR1HA	VERIZON NEW ENGLAND INC.	RBOC	TIVERTON
RI	WKPGR1WA	VERIZON NEW ENGLAND INC.	RBOC	WESTERLY
RI	WNSCRICL	VERIZON NEW ENGLAND INC.	RBOC	WOONSOCKET
RI	WRLYRIMA	VERIZON NEW ENGLAND INC.	RBOC	WESTERLY
RI	WRRNR1EV	VERIZON NEW ENGLAND INC.	RBOC	WARREN
RI	WRWKRIWS	VERIZON NEW ENGLAND INC.	RBOC	W WARWICK
RI	WWWKRIMA	VERIZON NEW ENGLAND INC.	RBOC	W WARWICK
RI	XXXXXXXX	VERIZON NEW ENGLAND INC.	RBOC	PROVIDENCE
RI	NKTRWRIBP	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - RI	WIRELESS	PROVIDENCE
RI	PRVDRI18	NEXTEL COMMUNICATIONS, INC.	WIRELESS	COVENTRY

Boomerang Wireless, LLC.  
Rhode Island Proposed Wire Center List  
2016-07-20

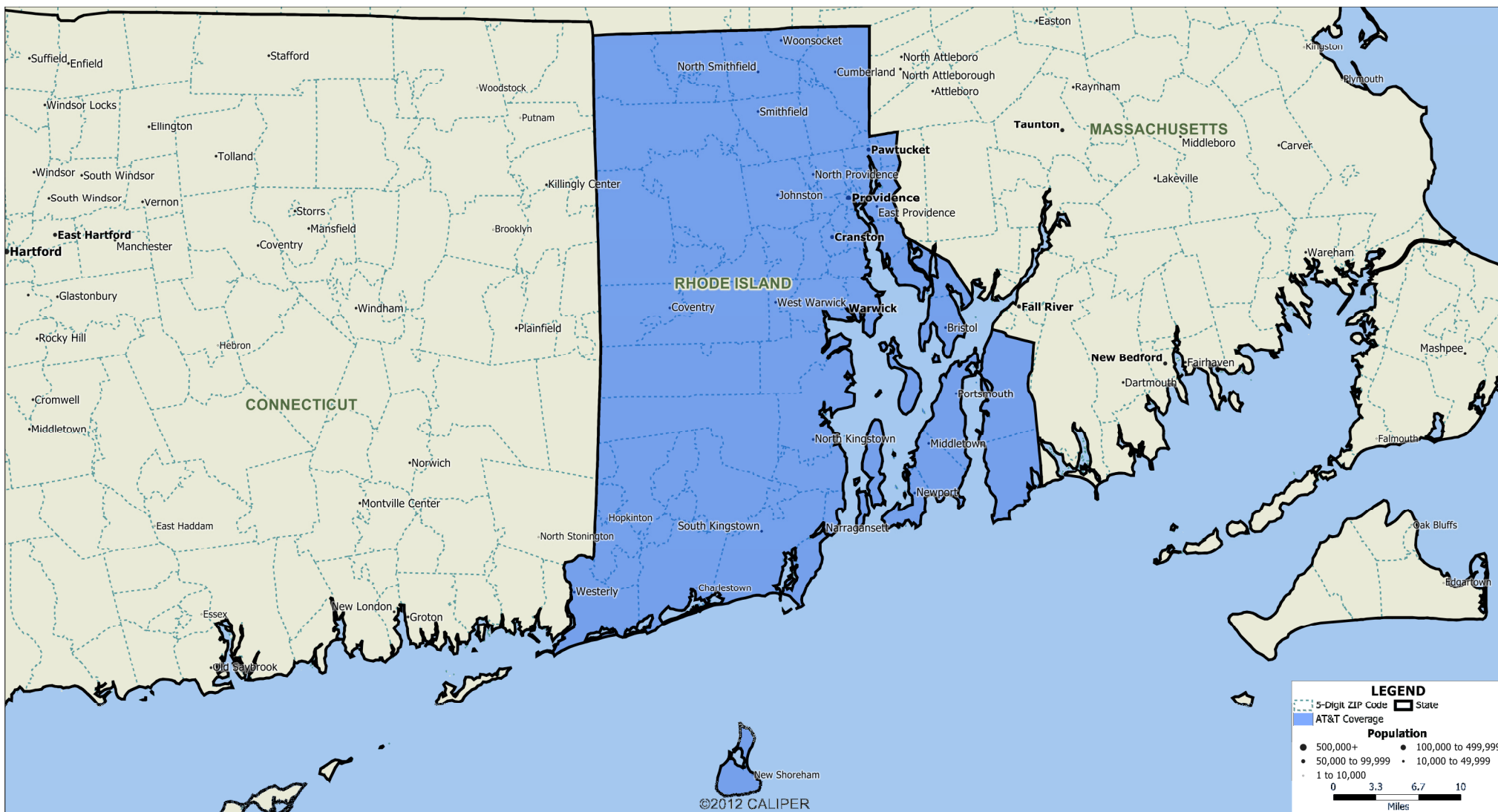
STATE	SHORT SWITCH	OCN_NAME	CATEGORY	RC ABBRE
RI	PRVDRIWA	USA MOBILITY WIRELESS, INC.	WIRELESS	PROVIDENCE
RI	PRVDRIWA	NEW CINGULAR WIRELESS PCS, LLC - DC	WIRELESS	PROVIDENCE











# Exhibit B



No. W00558689  
Date: 02/08/2008

## SECRETARY OF STATE

490DLC-000357573  
BOOMERANG WIRELESS, LLC

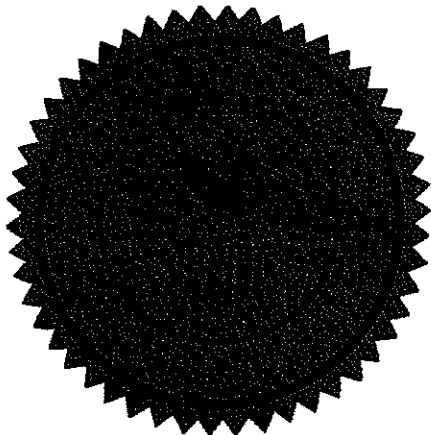
### ACKNOWLEDGEMENT OF DOCUMENT FILED

The Secretary of State acknowledges receipt of the following document

Articles of Organization

The document was filed on February 7, 2008, at 05:29 PM, to be effective as of February 7, 2008, at 05:29 PM.

The amount of \$50.00 was received in full payment of the filing fee.



*Michael A. Mauro*

MICHAEL A. MAURO SECRETARY OF STATE



Printed on  
Recycled Paper



357573

## ARTICLES OF ORGANIZATION

OF

## BOOMERANG WIRELESS, LLC

TO THE SECRETARY OF STATE OF THE STATE OF IOWA:

Pursuant to Section 301 of the Iowa Limited Liability Company Act, the undersigned adopts the following Articles of Organization:

## ARTICLE I

## NAME

The name of the limited liability company is BOOMERANG WIRELESS, LLC (the "Company").

## ARTICLE II

## INITIAL REGISTERED AGENT AND REGISTERED OFFICE

The street address of the Company's initial registered office is 115 Third Street SE, Suite 1200, Cedar Rapids, IA 52401-1266, and the name of its initial registered agent at that office is David J. Zylstra.

## ARTICLE III

## PRINCIPAL OFFICE

The street address of the Company's principal office is 7424 Hampshire Drive NE, Cedar Rapids, IA 52402.

## ARTICLE IV

## MANAGEMENT

The business and affairs of the Company shall be governed by its Managers in the manner described in the Company's Operating Agreement. No Manager's, Member's, officer's or other person's action will bind the Company except as authorized pursuant to the Company's Operating Agreement.

523490 ART030 \$50.00 DMC 2 2808

3193660570

RECEIVED TIME FEB. 7. 5:29PM

2

## ARTICLE V

## PERIOD OF DURATION

The Company's existence will commence upon the acceptance of these Articles of Organization for filing with the Secretary of State of Iowa in accordance with the Iowa Limited Liability Company Act and will have a perpetual duration, unless dissolved sooner in accordance with the Iowa Limited Liability Company Act.

## ARTICLE VI

## NON-LIABILITY AND INDEMNIFICATION

A. A Manager or Member of this Company shall not be personally liable to the Company or its Members for any action taken, or failure to take any action as a Manager or as a Member with which management is vested, except for liability for: (i) the amount of a financial benefit received by a Manager or Member to which the Manager or Member is not entitled; (ii) an intentional infliction of harm on the Company; (iii) a violation of Section 807 of the Iowa Limited Liability Company Act (or any similar provision of any subsequent law enacted in Iowa); or (iv) an intentional violation of criminal law.

B. The Company may, pursuant to the Operating Agreement or by unanimous vote of the disinterested Members, indemnify and advance expenses to each individual who is or was a Manager or Member of the Company (and the heirs, executors, personal representatives or administrators of such individual) who was or is made a party to, or is involved in any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative, by reason of the fact that such person is or was a Manager or Member of the Company or is or was serving at the request of the Company as a Manager, director, officer, partner, trustee, employee or agent of another limited liability company, corporation, partnership, joint venture, trust, employee benefit plan or other enterprise.

C. The rights and authority conferred in this Article shall not be exclusive of any other right which any person may have or hereafter acquire under any statute, provision of the Articles of Organization or Operating Agreement of the Company, agreement, vote of Members, or otherwise.

D. Any repeal or amendment of this Article by the Members of the Company shall not adversely affect any right or protection of a Member or officer existing at the time of such repeal or amendment.

## ARTICLE VII

## EFFECTIVE DATE

These Articles of Organization shall be effective on the date of filing.

DATED this 7<sup>th</sup> day of February, 2008.

  
Dennis Henderson, Organizer

FILED  
IOWA  
SECRETARY OF STATE

2-7-08  
5:29 PM  
W558689





State of Rhode Island and Providence Plantations  
**Department of State | Office of the Secretary of State**  
Nellie M. Gorbea, Secretary of State

Certification Number: **16080049020**

*The office of the Secretary of State of the State of Rhode Island and Providence Plantations,  
HEREBY CERTIFIES, that*

**BOOMERANG WIRELESS, LLC**

*a lowa limited liability company, qualified to do business in Rhode Island on*

*May 21, 2012*

*Effective*

*May 21, 2012*

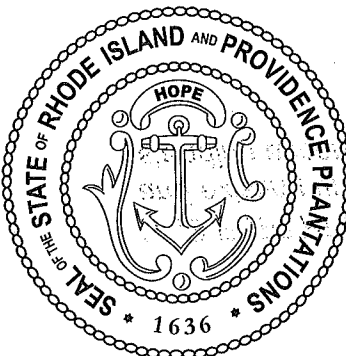
*IT IS FURTHER CERTIFIED that as of this date said limited liability company is duly organized  
and existing under and by virtue of the laws of the State of Rhode Island and is in good  
standing according to the records of this office.*

SIGNED AND SEALED ON

Thursday, August 18, 2016

Secretary of State

Authorized Agent



# Exhibit C

## **Executive Biographies**

### **Dennis Henderson, CEO & Owner**

Dennis Henderson is the CEO and co-founder of HH Ventures, Ready Wireless LLC and Boomerang. In this role, Dennis is responsible for the strategic vision, executive team development, and senior relationships with key suppliers, investors and partners. During his tenure, the company has experienced significant growth, and has delivered profitable results to shareholders.

In his 25 year career in the telecommunications industry, Dennis has held senior level positions in high growth, entrepreneurial companies including McLeod USA. This background afforded him insight into both carrier and distribution business models, including work with the leading national US wireless carriers, top tier retailers, and C-level executives in enterprise accounts. His industry relationships and creative approach to partnering has led Ready Wireless to become a significant aggregator of MVNO's in the United States. His successes include building Ready Mobile PCS, a prepaid wireless brand powered by Ready Wireless, which boasts distribution through 80K retail rooftops, a strong ecommerce business and emerging mobile commerce revenues.

Dennis was awarded the Corridor Business Journal Entrepreneur of the Year in 2009. He holds a BA and MBA from the University of Iowa.

### **Fred Haumesser, Executive Vice President & Owner**

Fred Haumesser is the Exec VP of Sales and co-founder of HH Ventures, Ready Wireless LLC and Boomerang. In this role, he has primary responsibility for revenue and margin performance of existing business including retail and ETC partnerships. He also leads business development efforts to build new distribution channels and partnerships. Fred's talent in networking and relationship development has led to major national retail opportunities, including Walgreens, CVS, and Aarons as well as large white label customers including AAA, Global Communication of America.

Fred has held senior level sales and business development positions in high growth, entrepreneurial companies including VP Sales at Titan Wireless. Fred also has significant experience in Direct to Consumer business models from his experience with The Allant Group.

His successes include building Ready Mobile PCS, a prepaid, wireless brand powered by Ready Wireless, which boasts distribution through 80K retail rooftops, a strong ecommerce business and emerging mobile commerce revenues.

## **Executive Biographies**

### **Kim Lehrman, President Boomerang Wireless**

Kim Lehrman is the President of Boomerang Wireless. In this role she is responsible for leading and establishing Boomerang as a premier Lifeline Service provider in the country. As the Chief Marketing Officer, Kim is also responsible for building the corporate brand and product portfolio to reach profitable customer segments. She leads product research, vendor relationships, channel marketing and design efforts.

Kim is an accomplished senior executive who has spent her career in high growth, entrepreneurial companies building brands and increasing shareholder value. Before joining Ready Wireless, Kim rose to the position of President of the third largest greeting card company in the US- Marian Heath Greeting Cards. Her technology background includes 15 years in senior level management positions in software, internet and telecomm companies. She was Owner/ VP Marketing in an internet start-up, LIVEware5, which was purchased by McLeod USA. During Parsons Technology's rapid ascent in the productivity software market, Kim was a member of the executive team and had P&L responsibility for the retail & licensing division.

Kim graduated magna cum laude with a BBA from the University of Iowa. She has a personal interest in organizational & talent development.

### **Jim Balvanz, Chief Financial Officer**

Jim Balvanz is the Chief Financial Officer of HH Ventures, Ready Wireless and Boomerang Wireless. In this role he has responsibility for financial relationships & reporting to stakeholders. He leads all budgeting, business planning, forecasting, product profitability analysis, and revenue assurance. He is highly engaged with regulatory compliance, and is the primary contact for legal and governmental liaison.

Jim has over 30 years of financial auditing & accounting executive experience primarily in telecommunications & call center industries. During the fast past growth of McLeod USA he was the VP of Finance Operations at this publicly held company. At Teleconnect, he led the financial operations as well during a time of successful growth and profitability, which led to the company being acquired by MCI.

Jim is a graduate of University of Northern Iowa, holding a BBA. He is a CPA.

### **Julia Redman-Carter, Regulatory and Compliance Officer**

Julia Redman-Carter has had a successful 26 year career in the telecommunications industry, with over 20 years focused on regulatory and compliance roles. For major carriers, including US West, McLeod USA and PAETEC, she has worked directly with Public Utility Commissions and national organizations. Her expertise includes translating federal and state legislation into methods and procedures that ensure the company is aligned with regulatory requirements. She is skilled at creating audit management systems which monitor and report on the company compliance history. The systems and processes she creates allow for broad communication across the organization ensuring all individuals are trained in their roles related to meeting federal and state guidelines. Julia's responsibilities over the last 15 months have been to build the enTouch Wireless regulatory and compliance programs which are on the forefront of industry practice.

Other skill sets Julia has developed include: telecommunications interconnection negotiations, and merger and acquisition due diligence. Her attention to detail and understanding of the legal and business ramifications of decisions makes her a trusted partner and advisor.

Julia holds a BA Metropolitan State College in Denver, Colorado and a JD from the University of Colorado in Boulder.

## **Executive Biographies**

### **Dana Pinter Karasek, Vice President Administration**

Dana Pinter Karasek is an experienced telecommunications executive with extensive knowledge of billing systems, network turn ups, and cross functional strategic program management. Dana is responsible for program management with our network, systems partners, and clients ensuring our projects are completed on time, on budget and on specification.

Dana is a graduate of the University of Iowa and holds a BBA.

### **Mike Schmidt, Chief Technology Officer**

Mike Schmidt has a proven track record of leading technology teams to model & build foundational system infrastructure allowing for organizational growth, flexibility and cost management. Mike is responsible for building a strong internal technology team to create a flexible, robust business platform. He also manages external partners as we integrate systems and networks into our MVNO Engine.

### **Jake Poshusta, Director of Operations**

Jake Poshusta, Director of Operations, is responsible for field audits, field support and internal process development and implementation. With over 17 years of telecommunications experience with Verizon Jake has managed many functions which are critical to the ETC business. These include: process development and auditing; managing compliance teams; leading training efforts for cross functional teams to ensure adherence to company policy. He is a graduate of Mount Mercy College with degrees in Business Management and Accounting.

### **Eric Klein, Controller**

Eric Klein, Controller, has 15 years of experience in the highly regulated waste management industry with Waste Management Inc. He has also held the role of Controller for entrepreneurial companies. Eric has proven talent for developing, communicating and auditing financial and government regulatory standards in companies. Providing accurate, timely and complete reporting to senior management and third party audit firms has been a centerpiece of his roles. Eric is also an experienced manager who puts internal controls and processes in place to provide continual feedback on key metrics and legal requirements. Eric is a graduate of Iowa State University with a BA in Accounting and he is a licensed CPA.

### **Kevin Rigdon, Director of Data & Systems Management**

Kevin Rigdon, Director of Data & Systems Management, is a seasoned telecommunication executive with 30 years of experience managing systems, network and platform teams. At Teleconnect/MCI Kevin held management roles in the IT organization. He also managed the billing and order management systems at McLeod USA a large CLEC. Start-up experience includes time in New Zealand building a new phone company called Clear Communications. At Yellow Book he helped them pivot their strategy from publishing to online marketing. Kevin uses these experiences to guide enTouch Wireless systems and process development to support the company growth and ensure we have management information and reporting with high integrity.



# Exhibit D





# 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 12-1286

Release Date: August 8, 2012

## WIRELINE COMPETITION BUREAU APPROVES THE COMPLIANCE PLANS OF BIRCH COMMUNICATIONS, BOOMERANG WIRELESS, IM TELECOM, Q LINK WIRELESS AND TAG MOBILE

WC Docket Nos. 09-197 and 11-42

The Wireline Competition Bureau (Bureau) approves the compliance plans of five carriers: Birch Communications, Inc. (Birch); Boomerang Wireless, LLC (Boomerang); IM Telecom, LLC (IM); Q Link Wireless, LLC (Q Link); and TAG Mobile, LLC (TAG). The compliance plans were 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 providing 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 requirement, subject to certain public safety and compliance obligations, is appropriate for carriers

<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, 27 FCC Rcd 6656, 6816-17 at paras. 379-380 (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); *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*, 27 FCC Rcd 6812, 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., Blanket Forbearance Compliance Plan, WC Docket Nos. 09-197 and 11-42, Q Link Wireless, LLC’s Third Amended Compliance Plan at 4 n. 2 (filed July 30, 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.

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 five plans listed in the Appendix for compliance with the conditions of the *Lifeline Reform Order*, and now approves those five 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.bcpweb.com](http://www.bcpweb.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*, 27 FCC Rcd 6813-6817 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*, 27 FCC Rcd 6679-80, 6818-19 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>
Birch Communications, Inc.	Further Amended Compliance Plan of Birch Communications, Inc.	July 2, 2012	09-197; 11-42
Boomerang Wireless, LLC	Boomerang Wireless, LLC Revised Compliance Plan	July 26, 2012	09-197; 11-42
IM Telecom, LLC	IM Telecom, LLC d/b/a Infiniti Mobile Compliance Plan	July 5, 2012	09-197; 11-42
Q Link Wireless, LLC	Q Link Wireless, LLC's Third Amended Compliance Plan	July 30, 2012	09-197; 11-42
TAG Mobile, LLC	TAG Mobile, LLC Compliance Plan	July 26, 2012	09-197; 11-42

# Exhibit E





# ENTOUCH GENERAL APPLICATION - RHODE ISLAND

## Lifeline Self-Certification Form

To enroll in the Lifeline America program you need to complete this form. If you need help call 844.891.1800 or visit [www.entouchwireless.com](http://www.entouchwireless.com). The information is used to certify with the Federal Communications Commission that you are participating in Lifeline with us.

**Lifeline Service Disclosure** | Lifeline is a government assistance program and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Only one Lifeline benefit is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one per household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and Lifeline is a non-transferable benefit and you may not transfer this benefit to any other person, regardless if they qualify for Lifeline.

COMPLETE  
THE LIFELINE  
APPLICATION



DON'T FORGET  
COPIES OF  
YOUR  
ELIGIBILITY  
DOCUMENTS!



UPON SUCCESSFUL REVIEW, YOU  
WILL RECEIVE A FREE PHONE AND  
LIFELINE BENEFIT IN THE MAIL  
WITHIN 10 BUSINESS DAYS.  
ENTOUCH WIRELESS WILL  
CONTACT YOU IF WE CANNOT  
PROCESS YOUR APPLICATION.

After contacting Customer Service, you may address your  
unsettled complaints to:

**RI Public Utilities Commission**  
89 Jefferson Boulevard  
Warwick, RI 02888  
401.941.4500

NEED HELP FILLING OUT THE APPLICATION?  
CALL US IF YOU HAVE QUESTIONS OR NEED HELP.

# 844.891.1800

### Step 1 | Certifications - Assistant Programs

I, or another member in the household including children,  
participate in the following public assistance programs:

**Circle One:** Supplemental Nutrition Assistance Program (SNAP)  
Medicaid | Supplemental Security Income (SSI)  
Low Income Home Energy Assistance Program (LIHEAP)  
Temporary Assistance for Needy Families (TANF)  
General Public Assistance (GPA)  
Rhode Island Pharmaceutical Assistance to the Elderly (RIPAE)  
Rhode Island Medical Assistance Program (MAP)  
National School Lunch (NSL) (Free Program Only)  
Section 8 Federal Public Housing Assistance  
Rhode Island Works  
Food Distribution on Indian Reservations (FDPIR)  
Bureau of Indian Affairs General Assistance (BIA)  
Tribally-Administered TANF  
General Assistance Tribally administered Head Start  
(meeting the income qualifications of Head Start.)

OR

You may qualify  
through public  
assistance  
programs or  
federal  
poverty  
guidelines.

### Certifications - Household Income

My household income is at or  
below 135% of the federal  
poverty guidelines for 2016.  
I provided documentation  
confirming my household  
income level. **Circle # of  
People in Household.**

(add \$5,616 per additional person above 6 to  
determine income guidelines)

# People in House	Maximum Annual Income
1	\$16,038
2	\$21,627
3	\$27,216
4	\$32,805
5	\$38,394
6	\$43,983

If you do not participate in one of these programs but someone in your household does:

Relationship to Participant

☐ I certify that the person demonstrating  
program participation is a member  
of my household.

Documents Reviewed for Certification

☐ I certify that the person name on the  
participation documentation is not  
already receiving a Lifeline discount.

Name of Person Participating



YOU WILL NOT QUALIFY  
FOR THE LIFELINE  
PROGRAM IF YOU DO NOT  
HAVE COPIES OF YOUR  
GOVERNMENT ID AND  
ELIGIBILITY DOCUMENTS  
SENT IN WITH YOUR  
APPLICATION.

### 2 Step 2 | Choose Your Plan.

Choose one of the  
following plans. This plan  
will be reloaded to your  
phone monthly as long as  
you are eligible & certified.

Choose a plan by checking the box.

#### FEATURE/ DESCRIPTION

Local Calls  
National Long Distance  
Voicemail  
Nationwide Text  
Free 411  
Data Enabled (website and email)  
Carry Over Minutes Month to Month

☐ **250 FREE**  
MONTHLY MINUTES

Y  
Y  
Y  
Y - 1 text = 1 min.  
Y  
10mb  
N

☐ **1100 FREE**  
MONTHLY MINUTES

Y  
Y  
Y  
Y - 1 text = 1 min.  
Y  
100mb  
N

Updated 8.24.16

### 3 Step 3 | Applicant Information

Full Name:

Residential Address\*:

\*No PO Boxes for  
Residential. Check One:

Shipping Address:

☐ Permanent

☐ Temporary Housing

City:

State:

Zip:

Email:

Phone:

Birth Date:

Last 4 digits of SSN # or Tribal ID\*\*:

\*\*Applicants living on Tribal lands who lack a Social  
Security Number may instead provide an official  
Tribal government identification card.

(init) I am seeking Tribal lands Lifeline support and certify that I reside on Federally-recognized Tribal lands.

If you self-certify that you live on tribal lands, which tribal lands do you live on?

TRIBAL

Continue on Back

(init) I acknowledge and consent to enTouch Wireless divulging my name, telephone number, address, date of birth, last four digits of SSN or Tribal ID, amount of support being sought, means of qualification for support, and dates of service initiation and termination to the Universal Service Administrative Company (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit. In the event that USAC identifies me as receiving more than one Lifeline subsidy per household, I acknowledge and understand that all carriers may be notified so that I may select one service and be de-enrolled from the other.

(init) I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required to do so.

(init) I understand that Lifeline is a federal government benefit program and that willfully making false statements in order to obtain this benefit can be punished by fine, or imprisonment, or I may be barred from the program.

(init) My household will receive no more than one Lifeline-supported service. Lifeline service is available for only one subscription per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the program, and could result in criminal prosecution by the United States government.

(init) I understand that I must notify enTouch Wireless and provide my new address within 30 days of moving.

(init) If I do not have a permanent address and have supplied instead a temporary address above, I understand that enTouch Wireless will attempt to verify every 90 days that I continue to rely on that address, and that I must notify enTouch Wireless within 30 days of my new address after moving. If I do not respond to enTouch Wireless' address verification attempts within 30 days, I understand that I may be de-enrolled from enTouch Wireless' Lifeline service.

(init) I understand that I must notify enTouch Wireless within 30 days if (1) I cease to participate in a federal or state qualifying program or my annual household income exceeds 135 percent of the federal poverty guidelines; (2) I receive more than one Lifeline-supported service; or (3) Another member of my household is receiving a Lifeline benefit or (4) I for any other reason no longer satisfy the criteria for receiving Lifeline support. I understand that I will be subject to penalties if I fail to follow this notification requirement, including being de-enrolled from the Lifeline program.

(init) I understand and acknowledge that Lifeline service is a non-transferable benefit and that I may not transfer my service to any other individual, including another low-income consumer.

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

(init) I hereby authorize enTouch Wireless to send text messages to my enTouch Wireless provided wireless number about my Lifeline benefit. Text messages sent by enTouch Wireless will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than the Company.

(init) I attest under penalty of perjury that the information herein is true and correct to the best of my knowledge.



We may not be able to complete processing your application if you do not fill out this section.

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

**You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.**

Please initial the certifications below and sign and date this worksheet.

A. ☐ I certify that I live at an address occupied by multiple households.

B. ☐ I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Signature

Date

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner)  
☐ YES ☐ NO

- If you checked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.
- If you checked NO, please answer question #2.

2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

- |    |  |                              |                             |
|----|--|------------------------------|-----------------------------|
| A. | A parent   | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| B. | An adult son or daughter   | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| C. | Another adult relative (such as a sibling, aunt, cousin, grandparent,, etc.) | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| D. | An adult roommate  | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| E. | Other _____  | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

- If you checked NO for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.
- If you checked YES, please answer question #3.

3. Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?

☐ YES ☐ NO

- If you checked NO, then your address includes more than one household. Please initial lines A and B below, and sign and date the worksheet.
- If you checked YES, then your address includes only one household. You may not sign up for Lifeline because someone in your household already receives Lifeline.

**YOU ARE DONE: SIGN AND DATE BELOW TO COMPLETE YOUR FORM. MAKE SURE YOU HAVE SIGNED SECTION 5 ABOVE TO ENSURE THAT WE CAN COMPLETE PROCESSING YOUR LIFELINE APPLICATION.**

Applicant's Signature

Date



**MAIL US YOUR APPLICATION & SUPPORT DOCUMENTATION:**

**enTouch Wireless - 955 Kacena Rd, Ste A | Hiawatha, IA 52233**

**STOP!!!**

**DON'T FORGET TO INCLUDE COPIES OF YOUR ELIGIBILITY DOCUMENTS!**



# Exhibit F



# FREE

## PHONE

*Not a Lifeline supported benefit.  
Provided by enTouch Wireless.*

## INTERNET

*Supported by Lifeline benefit.  
A government sponsored program.*

## MINUTES!

*Supported by Lifeline benefit.  
A government sponsored program.*

**YOU MAY BE ELIGIBLE FOR THIS BENEFIT IF YOU PARTICIPATE IN:  
FOOD STAMPS • MEDICAID • FREE LUNCH • PUBLIC HOUSING • SSI • OR MEET INCOME REQUIREMENTS**

**DATE:** \_\_\_\_\_

**PLACE:** \_\_\_\_\_

**TIME: (M-F)** \_\_\_\_\_  
**(Sat)** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_



# 11123

enTouch Wireless  
will provide a

# FREE PHONE



*(Not a Lifeline supported benefit)*

enTouch  
WIRELESS  
POWERED BY BOOMERANG WIRELESS



Lifeline is a government assistance program. enTouch Wireless represents the Lifeline service in your state.

PLEASE NOTE: You have to be eligible to receive Lifeline services. A current government benefit card or income document and your government issued ID is needed to sign up. Lifeline is available to only one person per household. When you receive the service, you cannot transfer it to another person. 911 Emergency Service is available where wireless service is located, which can be reduced by buildings, weather, mountains, etc. If your phone is out of range in an emergency dial 911 from a landline phone.

**CALL NOW!**

**[www.entouchwireless.com](http://www.entouchwireless.com)**

# 866.488.8719







## Eligibility Requirements

Lifeline is a government sponsored benefit. You can receive a discount on your phone service.

### 1) You, or one of your dependents, participates in one of these programs:

Supplemental Nutrition Assistance Program (SNAP)	Medicaid
Supplemental Security Income (SSI)	Food Distribution Program on Indian Reservations
Low-Income Heat & Energy Assistance (LIHEAP)	Tribally Administered TANF
Section 8 Federal Public Housing Assistance	Bureau of Indian Affairs General Assistance
Temporary Assistance for Needy Families (TANF)	Tribally Administered Head Start (meeting the income qualifications of Head Start)
National School Lunch Program (NSL) Free Program Only	

There may be additional programs for various states. See state specific Lifeline application for a full list of applicable programs.

### 2) Limit 1 Lifeline benefit per household.

One Lifeline program (wireline or wireless) per household. Household is defined as an individual or group of individuals living together at the same address as one economic unit. Lifeline service is non-transferable.

### 3) If I am not in qualifying program, I may participate if income qualified.

# Persons in Household	Income	# Persons in Household	Income
1	\$16,038	4	\$32,805
2	\$21,627	5	\$38,394
3	\$27,216	6	\$43,983

Incomes above reflect 135% of the 2016 FPG for income. See state specific Lifeline application to reflect 150% FPG for income for applicable states.

### 4) Must have valid physical address.

Notify us immediately of any change of address by calling customer service.

### 5) Cannot choose phone model or phone number.

You are not able to choose the free handset, trade free handsets, or choose the phone number on the free handset.

### 6) Keep Active.

Use your phone every 60 days to keep Lifeline benefit active.

### 7) Must be truthful in application process.

**WARNING:** If you make false statements to gain benefits, you can be punished by fine or imprisonment or you can be barred from the Lifeline program.

### 8) Complete the application. Personal documents required.

Complete the application truthfully & accurately.

**Documentation for application process:** Proof of identity (i.e., Government Issued ID).

**Program eligibility documentation:** Current statement of benefits from qualifying program, notice letter of participation, program document (i.e., SSI card), Income eligibility documents (i.e., tax return, paycheck stub, VA benefit statements, etc).

### 9) Recertify annually that you remain eligible for the Lifeline benefits.

Once you receive the Lifeline benefit, you must complete the annual recertification process. Learn more in your welcome package.

11125



# DISCLOSURES

## YOU WILL HAVE TO VERIFY AND SIGN THIS DISCLOSURE FORM IN ORDER TO RECEIVE YOUR LIFELINE PHONE

I acknowledge and consent to enTouch Wireless divulging my name, telephone number, address, date of birth, last four digits of SSN or Tribal ID, amount of support being sought, means of qualification for support, and dates of service initiation and termination to the Universal Service Administrative Company (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit. In the event that USAC identifies me as receiving more than one Lifeline subsidy per household, I acknowledge and understand that all carriers may be notified so that I may select one service and be de-enrolled from the other.

I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required to do so.

I understand that Lifeline is a federal government benefit program and that willfully making false statements in order to obtain this benefit can be punished by fine or imprisonment or I may be barred from the program.

My household will receive no more than one Lifeline-supported service. Lifeline service is available for only one subscription per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the program, and could result in criminal prosecution by the United States government.

I understand that I must notify enTouch Wireless and provide my new address within 30 days of moving.

If I do not have a permanent address and have supplied instead a temporary address above, I understand that enTouch Wireless will attempt to verify every 90 days that I continue to rely on that address, and that I must notify enTouch Wireless within 30 days of my new address after moving. If I do not respond to enTouch Wireless' address verification attempts within 30 days, I understand that I may be de-enrolled from enTouch Wireless' Lifeline service.

I understand that I must notify enTouch Wireless within 30 days if (1) I cease to participate in a federal or state qualifying program or my annual household income exceeds 135% (150% for AZ, KS, MI, OH, TX) of the federal poverty guidelines; (2) I receive more than one Lifeline supported service; or 3) Another member of my household is receiving a Lifeline benefit or (4) I for any other reason no longer satisfy the criteria for receiving Lifeline support. I understand that I will be subject to penalties if I fail to follow this notification requirement, including being de-enrolled from the Lifeline program.

I understand and acknowledge that Lifeline service is a non-transferable benefit and that I may not transfer my service to any other individual, including another low-income consumer.

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

I hereby authorize enTouch Wireless to send text messages to my enTouch Wireless number about my Lifeline benefit. Text messages sent by enTouch Wireless will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than the Company.

I attest under penalty of perjury that the information herein is true and correct to the best of my knowledge.

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

11119

### Lifeline Self-Certification Form

To enroll in the Lifeline America program you need to complete this form. The information is used to certify with the Federal Communications Commission that you are participating in Lifeline with us.



### Lifeline Service Disclosure

Lifeline is a government assistance program and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program. Only one Lifeline benefit is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. Violation of the one per household limitation constitutes a violation of the Federal Communications Commission's rules and will result in your de-enrollment from the program, and Lifeline is a non-transferable benefit and you may not transfer this benefit to any other person, regardless if they qualify for Lifeline.

### Certifications: I have proof of participation in one of the following public assistance programs (check one):

Supplemental Nutrition Assistance Program (SNAP)	National School Lunch Program (NSL) <i>Free Program Only</i>
Supplemental Security Income (SSI)	Food Distribution Program on Indian Reservations
Temporary Assistance for Needy Families (TANF)	Tribally Administered TANF
Section 8 Public Housing Assistance	Bureau of Indian Affairs General Assistance
Medicaid	Tribally Administered Head Start <i>Meeting the income qualifications of Head Start</i>
Low-Income Energy Assistance Program (LIEAP)	

My household income is at or below 135% of 2016 federal poverty guidelines. I provided documentation confirming my household income level.

# Persons in Household	Income	# Persons in Household	Income
1	\$16,038	4	\$32,805
2	\$21,627	5	\$38,394
3	\$27,216	6	\$43,983

See state specific Lifeline application to reflect 150% FPG for income for applicable states.

### Signature (Read, Initial & Sign)

\_\_\_\_\_(init) I acknowledge and consent to enTouch Wireless divulging my name, telephone number, address, date of birth, last four digits of SSN or Tribal ID, amount of support being sought, means of qualification for support, and dates of service initiation and termination to the Universal Service Administrative Company (the administrator of the program) and/or its agents for the purpose of verifying that the subscriber does not receive more than one Lifeline benefit. In the event that USAC identifies me as receiving more than one Lifeline subsidy per household, I acknowledge and understand that all carriers may be notified so that I may select one service and be de-enrolled from the other.

\_\_\_\_\_(init) I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility if required to do so.

\_\_\_\_\_(init) I understand that Lifeline is a federal government benefit program and that willfully making false statements in order to obtain this benefit can be punished by fine or imprisonment or I may be barred from the program.

\_\_\_\_\_(init) My household will receive no more than one Lifeline-supported service. Lifeline service is available for only one subscription per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. I understand that violation of the one-per-household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the program, and could result in criminal prosecution by the United States government.

\_\_\_\_\_(init) I understand that I must notify enTouch Wireless and provide my new address within 30 days of moving.

\_\_\_\_\_(init) If I do not have a permanent address and have supplied instead a temporary address above, I understand that enTouch Wireless will attempt to verify every 90 days that I continue to rely on that address, and that I must notify enTouch Wireless within 30 days of my new address after moving. If I do not respond to enTouch Wireless' address verification attempts within 30 days, I understand that I may be de-enrolled from enTouch Wireless' Lifeline service.

\_\_\_\_\_(init) I understand that I must notify enTouch Wireless within 30 days if (1) I cease to participate in a federal or state qualifying program or my annual household income exceeds 135% (150% for AZ, KS, MI, OH, TX) of the federal poverty guidelines; (2) I receive more than one Lifeline-supported service; or (3) Another member of my household is receiving a Lifeline benefit or (4) I for any other reason no longer satisfy the criteria for receiving Lifeline support. I understand that I will be subject to penalties if I fail to follow this notification requirement, including being de-enrolled from the Lifeline program.

\_\_\_\_\_(init) I understand and acknowledge that Lifeline service is a non-transferable benefit and that I may not transfer my service to any other individual, including another low-income consumer.

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

\_\_\_\_\_(init) I hereby authorize the Company to send text messages to my Company provided wireless number about my Lifeline benefit. Text messages sent by the Company will not decrement my available wireless minutes or texts. Standard voice, data and text rates will apply to all messages to and from anyone other than the Company.

\_\_\_\_\_(init) I attest under penalty of perjury that the information herein is true and correct to the best of my knowledge.

#11602

## Lifeline Free Monthly Minutes

Choose Your Plan: Choose one of the following plans. This plan will be reloaded to your phone monthly as long as you are eligible & certified.

FEATURE/ DESCRIPTION	250 FREE MONTHLY MINUTES	TRIBAL
		1000 PLUS BUNDLE PLAN
Local Calls	Y	Y
National Long Distance	Y	Y
Voicemail	Y	Y
Nationwide Text	Y - 1 text = 1 min.	Y - 1 text = 1 min.
Free 411	Y	Y
Data Enabled (website and email)	Y	Y
Carry Over Minutes Month to Month	N	N

Plans available may vary by state. See state specific Lifeline application for available plans.

## Top Up with Airfair

*need more talk & text or data?*

Look for these brands at your nearest retailer or call Customer Service to top up.



enTouch Customer Service:

**866.488.8719**



Find top ups at a Airfair Retailer near you!

**www.entouchwireless.com**



Price	Talk/Text Units	Data	Days
<b>\$5</b>	0	100mb	30
<b>\$10</b>	0	500mb	30
<b>\$20</b>	1500	0	30
<b>\$30</b>	Unlimited*	0	30
<b>\$50</b>	Unlimited*	4gb	30

1 Unit = 1 Text OR 1 Voice Minute

\* Subject to the 3000 units and Acceptable Use Policy

**For the complete Terms of Service go to [entouchwireless.com](http://entouchwireless.com) or call Customer Service at 866-488-8719 or dial 611 free from your Lifeline phone.**

Lifeline is a government assistance program. enTouch Wireless represents the Lifeline service in your state.

PLEASE NOTE: You have to be eligible to receive Lifeline services. A current government benefit card or income document and your government issued ID is needed to sign up. Lifeline is available to only one person per household. When you receive the service, you cannot transfer it to another person. 911 Emergency Service is available where wireless service is located, which can be reduced by buildings, weather, mountains, etc. If your phone is out of range in an emergency dial 911 from a landline phone.



## Terms of Service - Summary

**Lifeline is a government sponsored benefit. You can receive a discount on your phone service.**

Terms of Service for Communication Services - Effective as of May 6, 2013 until replaced.  
The Terms of Service are part of your agreement with enTouch Wireless for Mobile Services.

**Use of Services and Equipment:** Services and equipment may not be used for any unlawful, fraudulent or abusive purpose. enTouch Wireless service is for personal use only.

**Phone Number:** We assign telephone numbers and other personal identifiers in connection with the Services. You do not have any property right to your phone number. It may be changed or reassigned.

**Phones and Other Equipment:** The only warranties on the phones or other equipment are any limited warranties extended by the manufacturers.

**Lost or Stolen Equipment:** If your phone or other equipment is lost or stolen, you must notify us by calling enTouch Wireless Customer Service. You are responsible for all charges for Services provided to the Number for the lost or stolen equipment. We will deactivate Services to the Number upon notification to us of any loss or theft. If the equipment is later found, we may require that you exchange it for another phone or other equipment before we reactivate Services (if we do reactivate Services), as well as require you to pay a reactivation or replacement fee of \$25.00.

**Service, Prepaid Services:** Upon certification of eligibility, and continuing eligibility, you will receive free voice services. This positive account balance will be applied every 30 days on the anniversary of your service activation. You must maintain an ACTIVE ACCOUNT every 60 days: by having voice usage (inbound or outbound); by buying additional product; or by responding affirmatively to our queries regarding your desire to continue to receive services. You are required to recertify annually.

**Misuse of Service:** You have certified your eligibility to receive free services under the federally funded Lifeline program. If your eligibility to participate in this program changes, you agree to immediately notify enTouch Wireless at 1.866.488.8719. Lifeline is a non-transferable benefit. You agree not to use the service or modify your handset in any fraudulent, unlawful, harassing, or abusive purpose, or in such a way as to create damage or risk to our business.

**Exchange Policy:** Defective handsets or other defective equipment provided at no cost to you may be eligible for exchange. To exchange a defective handset, please call Customer Service at 1.866.488.8719 to obtain a Return Authorization and shipping instructions.

**Concerns, Complaints or Disputes:** If you have questions, concerns, comments or complaints, please contact enTouch Wireless at [www.entouchwireless.com](http://www.entouchwireless.com) or call Customer Care by dialing 611 from your cell phone (does not use your Lifeline minutes) or dialing 1-866-488-8719 from another phone.

**Termination of Access:** enTouch Wireless may terminate your access without notice, for any conduct that enTouch Wireless, in its sole discretion, believes to be harmful: to individual users; to enTouch Wireless or any of its affiliates; to any rights of enTouch Wireless or any third party; or that violate applicable laws.

### Plan Offerings & Rates:

FEATURE / DESCRIPTION	250 FREE MONTHLY MINUTES	TRIBAL
		1000 PLUS BUNDLE PLAN
Local Calls	Y	Y
National Long Distance	Y	Y
Voicemail	Y	Y
Nationwide Text	Y - 1 text = 1 min.	Y - 1 text = 1 min.
Free 411	Y	Y
Data Enabled (website and email)	Y	Y
Carry Over Minutes Month to Month	N	N

Plans available may vary by state. See state specific Lifeline application for available plans.

Lifeline is a government assistance program. enTouch Wireless represents the Lifeline service in your state.

PLEASE NOTE: You have to be eligible to receive Lifeline services. A current government benefit card or income document and your government issued ID is needed to sign up. Lifeline is available to only one person per household. When you receive the service, you cannot transfer it to another person. 911 Emergency Service is available where wireless service is located, which can be reduced by buildings, weather, mountains, etc. If your phone is out of range in an emergency dial 911 from a landline phone.

Item #11598

**Abbreviated Terms of Service for Communication Services**

Effective as of 5/6/13 until replaced.

**The Terms of Service are part of your agreement with enTouch Wireless for Mobile Services.**

**Use of Services and Equipment:** Services and equipment may not be used for any unlawful, fraudulent or abusive purpose. enTouch Wireless service is for personal use only.

**Phone Number:** We assign telephone numbers and other personal identifiers in connection with the Services. You do not have any property right to your phone number. It may be changed or reassigned.

**Phones and Other Equipment:** The only warranties on the phones or other equipment are any limited warranties extended by the manufacturers.

**Lost or Stolen Equipment:** If your phone or other equipment is lost or stolen, you must notify us by calling enTouch Wireless Customer Support. You are responsible for all charges for Services provided to the Number for the lost or stolen equipment. We will deactivate Services to the Number upon notification to us of any loss

or theft. If the equipment is later found, we may require that you exchange it for another phone or other equipment before we reactivate Services (if we do reactivate Services), as well as require you to pay a reactivation or replacement fee of \$25.00.

**Service, Prepaid Services:** Upon certification of eligibility, and continuing eligibility, you will receive free voice services. This positive account balance will be applied every 30 days on the anniversary of your service activation. You must maintain an ACTIVE ACCOUNT every 60 days: by having voice usage (inbound or outbound); by buying additional product; or by responding affirmatively to our queries regarding your desire to continue to receive services. You are required to recertify annually.

**Misuse of Service:** You have certified your eligibility to receive free services under the federally funded Lifeline program. If your eligibility to participate in this program changes, you agree to immediately notify enTouch Wireless at 1.866.488.8719. Lifeline is a non-transferable benefit. You agree not to use the service or modify your handset in any fraudulent, unlawful, harassing, or abusive

purpose, or in such a way as to create damage or risk to our business.

**Exchange Policy:** Defective handsets or other defective equipment provided at no cost to you may be eligible for exchange within 30 days of receiving the device. To exchange a defective handset, please call Customer Support at 1.866.488.8719 to obtain a Return Authorization and shipping instructions.

**Concerns, Complaints or Disputes:** If you have questions, concerns, comments or complaints, please contact enTouch Wireless at www.entouchwireless.com or call Customer Support by dialing 611 from your cell phone (does not use your Lifeline minutes) or dialing 1-866-488-8719 from another phone.

**Termination of Access:** enTouch Wireless may terminate your access without notice, for any conduct that enTouch Wireless, in its sole discretion, believes to be harmful; to individual users; to enTouch Wireless or any of its affiliates; to any rights of enTouch Wireless or any third party; or that violate applicable laws.

**For the complete Terms of Service visit** [www.entouchwireless.com](http://www.entouchwireless.com).

**State Commission Contact:**

For unresolved questions or complaints you may contact the applicable state commission or contact.

**Arizona Corporation Commission**  
1200 W. Washington St. • Phoenix, AZ 85007  
Local: 602.542.4251 Toll Free: 800.222.7000

**Colorado Public Utilities Commission Consumer Affairs**  
1560 Broadway • Suite 250 • Denver, Colorado 80202  
Toll Free: 800.456.0858 Fax: 303.894.2532  
E-mail: [dora\\_puc\\_complaints@state.co.us](mailto:dora_puc_complaints@state.co.us)

**Kansas Corporation Commission, Office of Public Affairs and Consumer Protection**  
1500 SW Arrowhead Road • Topeka, KS 66604  
Topeka: 785.271.3140 Toll Free: 800.662.0027  
Hearing/speech impaired at TDD Kansas Relay Center: 800.766.3777

**Minnesota Public Utilities Commission**  
121 7<sup>th</sup> Place E. • Suite 350 • Saint Paul, MN 55101-2147  
Toll Free: 800.657.3782 Fax: 651.297.7073

**Oklahoma Corporation Commission**  
P.O. Box 52000 • Oklahoma City, OK 73152-2000  
Local: 405.521.2331 Toll Free: 800.522.8154

**Washington State Office of the Attorney General**  
800 5<sup>th</sup> Ave. Suite 2000 • Seattle, WA • 98104-3188  
Toll Free: 1.800.551.4636 (in Washington only)  
Local Phone: 206.464.6684  
Washington State Relay Service for the Hearing Impaired: 1.800.833.6388  
[www.atg.wa.gov](http://www.atg.wa.gov)



Contact Us

[www.entouchwireless.com](http://www.entouchwireless.com) | 866.488.8719

Save this information!

Phone #: \_\_\_\_\_

My ESN: \_\_\_\_\_

Anniversary Date\*: \_\_\_\_\_



**866.488.8719**



\*Your minutes will be added every 30 days from this date.  
\*Sus minutos estaran agregados cada 30 dias desde esta fecha.

What happens now?

**What should I do when I receive my phone?**

When you receive your phone in the mail, follow the instructions below. Once you call to Activate, your Lifeline Minutes will be activated on your phone.

**What features come with my phone?**

You will have excellent coverage with national wireless networks. Free 411 calls, Voicemail, Call Forwarding, Three Way Calling, Data Enabled & other features.

**What do I receive with my service?**

You will receive your free handset that is loaded monthly with your Lifeline Minutes. Every 30 days after your activation date, your balance will automatically reload on your phone as long as you have an ACTIVE ACCOUNT. If you have not used your phone in 60 days your Lifeline service will be deactivated.

**Can I get more minutes, text or data?**

You can add voice minutes, texts, and data at any time. See backside for more talk, text & data plans. Look for these brands to top up with at your local retailers or call Customer Support at 866.488.8719 to top up.



## Welcome to enTouch!

Follow these easy steps to get started. We will help you get started, answer questions and give options to purchase more talk, text or data.



### 1 Welcome to the Lifeline Program.

**Activate Phone:** Call 319.471.4802 before leaving event to activate.

**Phone Number:** Your phone number is located on the inside of the battery door and circled on the outside sticker of the bag you received your phone in.

**Free Minutes:** You get free minutes monthly from Lifeline. (Programs vary by state.) Minutes will automatically reload on your anniversary date.

**Keep Active:** Make a call on your phone regularly to keep plan active. No use in 60 days will deactivate your device.

**Check Balance:** Dial 611 on your Lifeline phone. Press 1 to hear balance.

**Your Phone Company is enTouch Wireless powered by Boomerang Wireless.**

**Questions?** Dial 611 on your Lifeline phone or call 866.488.8719 from a land line phone.

**Active el Teléfono:** Llame al 319.471.4802 antes de salir del evento para activar su teléfono.

**Número de Teléfono:** Su número de teléfono se indica en el interior de la tapa de la batería y también está encerrado en un círculo en la etiqueta exterior de la bolsa en que le entregaron su teléfono.

**Minutos Gratis:** Cada mes, Lifeline le da minutos gratis. (Los programas varían según el estado.) Los minutos se cargan automáticamente cada mes en su fecha de aniversario.

**Manténgalo Activo:** Use el teléfono con regularidad para mantener activo su plan. Su dispositivo se desactivará si no lo usa en 60 días.

**Compruebe:** Marque 611 desde su teléfono Lifeline. Presione 1 para escuchar el balance.

**Su Compañía de Teléfono es enTouch Wireless powered by Boomerang Wireless.**

**Preguntas?** Marque 611 desde su teléfono Lifeline o llame 866.488.8719 desde un teléfono.

### 2 Questions? Access Information from Your Phone.

Dial 611 from your Lifeline phone or call 866.488.8719.

¿Tiene preguntas? Marque 611 desde su teléfono Lifeline o llame 866.488.8719.

1 Press 1 to hear your air time balance.

Presione 1 para escuchar su balance de minutos.

2 Press 2 to add minutes to your cell phone.

Presione 2 para añadir minutos a su teléfono celular.

3 Press 3 for assistance with your phone.

Presione 3 para obtener ayuda con su teléfono.

4 Press 4 to find out your anniversary date.

Presione 4 para saber su fecha de aniversario.

### 3 Want More Talk, Text or Data?

#### ¿Necesita más minutos?

Es fácil añadirle minutos a su teléfono. Vea los detalles del plan al dorso.

Follow the directions below to top up through Customer Support or at your local retailer.



#### Customer Support:

Dial 611 on your Lifeline phone or call 866.488.8719 from a land line phone. Debit or credit card required.

Marque 611 desde su teléfono Lifeline o llame 866.488.8719. Se requiere tarjeta de débito o de crédito.



#### Retail:

Check our website for a retail location near you | [www.ontouchwireless.com](http://www.ontouchwireless.com)

Tiendas: Busque las tarjetas de recarga en las siguientes tiendas locales.



Price	Talk/Text Units	Data	Days
\$5	0	100mb	30
\$10	0	500mb	30
\$20	1500	0	30
\$30	Unlimited*	0	30
\$50	Unlimited*	4gb	30

1 Unit = 1 Text or 1 Voice Minute

\* Rates are subject to change without notice.

\* Subject to the 4800 word and Acceptable Use Policy



Price	Minutes	Texts	Data	Days
\$7	100	200	5mb	7
\$20	500	1,000	20mb	30
\$30	1,000	1,200	30mb	30

Rates are subject to change without notice.



955 Kacena Rd, Ste A  
Hiawatha, IA 52233

email: [support@ontouchwireless.com](mailto:support@ontouchwireless.com)



866.488.8719

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



## Need More Talk, Text or Data?



**Customer Support:**  
**866.488.8719**

Dial 611 on your Lifeline phone or call  
866.488.8719 from a landline phone.  
*Debit or Credit Card required.*



### Retail Stores:

Look for the following reload  
cards at local retailers. Call  
Customer Support to locate a  
retailer nearest you or visit

**[www.entouchwireless.com](http://www.entouchwireless.com)**

Price	Talk/Text Units	Data	Days
<b>\$5</b>	<b>0</b>	<b>100mb</b>	<b>30</b>
<b>\$10</b>	<b>0</b>	<b>500mb</b>	<b>30</b>
<b>\$20</b>	<b>1500</b>	<b>0</b>	<b>30</b>
<b>\$30</b>	<b>Unlimited*</b>	<b>0</b>	<b>30</b>
<b>\$50</b>	<b>Unlimited*</b>	<b>4gb</b>	<b>30</b>
<b>1 Unit = 1 Text OR 1 Voice Minute</b>			

\* Subject to the 3000 units and Acceptable Use Policy

**Top Up at your local 7 Eleven Store**



Item #11171 - 2.1.16

Airfair Bag Insert - 5.5 x 4.25



Source 12/14; Values based on estimations from confused.com

## FREE INTERNET | 100MB DATA



BUY AIRFAIR AT YOUR LOCAL 7-11

**\$5 | \$10 | \$20 | \$30 | \$50**

Item #11601

Lifeline is a government assistance program. enTouch Wireless represents the Lifeline service in your state.  
PLEASE NOTE: You have to be eligible to receive Lifeline services. A current government benefit card or income document and your government issued ID is needed to sign up. Lifeline is available to only one person per household. When you receive the service, you cannot transfer it to another person. 911 Emergency Service is available where wireless service is located, which can be reduced by buildings, weather, mountains, etc. If your phone is out of range in an emergency dial 911 from a landline phone.

# YOU WILL NEED:



**YOU WILL NOT QUALIFY FOR A FREE PHONE  
IF YOU DO NOT HAVE THESE DOCUMENTS.**

1

## GOVERNMENT ISSUED PHOTO ID



SAMPLE

- DRIVERS LICENSE
- TRIBAL ID

2

## PROGRAM ELIGIBILITY DOCUMENT

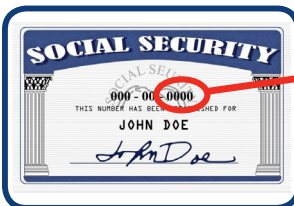


SAMPLE

- MEDICAID CARD
- SNAP CARD
- FREE LUNCH
- PUBLIC HOUSING VOUCHER
- SSI CARD

3

## GOVERNMENT ID NUMBER



SAMPLE

**LAST  
4 NUMBERS  
OF SOCIAL  
SECURITY #  
OR TRIBAL ID #**

# WANT MORE?



*Not a Lifeline supported benefit.*

Price	Talk/Text Units	Data	Days
\$5	0	100mb	30
\$10	0	500mb	30
\$20	1500	0	30
\$30	Unlimited*	0	30
\$50	Unlimited*	4gb	30

1 Unit = 1 Text or 1 Voice Minute

Rates are subject to change without notice  
\* Subject to the 3000 units and Acceptable Use Policy

## LOCATIONS WHERE YOU CAN TOP UP WITH AIRFAIR:

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Call Customer Service to Top Up:

**866.488.8719**



Visit us to find your local retailer:  
**[www.airfairmobile.com](http://www.airfairmobile.com)**



## ACCEPTABLE USAGE POLICY

Applies to all LifeLine products and services.

**PROHIBITED NETWORK USE:** Unlimited Services: Services and equipment may not be used for any unlawful, fraudulent, harassing, or abusive purpose. enTouch Wireless service is for personal use only. By requesting Services, you agree that you will not use Services and equipment in any unlawful, fraudulent or abusive manner. enTouch Wireless reserves the right, without notice or limitation, to limit, deny, terminate, end, modify, disconnect, or suspend Service if any individual engages in any prohibited voice, text, or data uses detailed below, or if enTouch Wireless determines, on a case-by-case basis, that action is necessary to protect its wireless network, business, equipment, or Services from harm or degradation resulting from such prohibited uses.

• **VOICE AND TEXT SERVICES:** enTouch Wireless provides its voice and text Services solely for live dialogue between, and initiated by, individuals for personal use and as otherwise described in this policy. You may not use enTouch Wireless voice and text Services for monitoring services, data transmissions, transmission of broadcasts, transmission of recorded material, telemarketing, broadcast or autodialed calls or texts, other commercial uses, or other connections that do not consist of uninterrupted live dialogue between individuals. This Service may not be used in a manner that interferes with other enTouch Wireless customer's use of the service. Service levels of other customers may be impaired when users place abnormally high numbers of calls, send or receive very high numbers of messages, or repeatedly make calls of abnormally long duration compared with other enTouch Wireless customers.

• **DATA SERVICES:** enTouch Wireless data Services are provided only for personal (i.e., non-commercial) use, which includes web surfing, sending and receiving email, photographs and other similar messaging activities, and the non-continuous streaming of videos, downloading files or online gaming. enTouch Wireless data Services may not be used for any of the following uses: (1) to generate excessive levels of Internet traffic through the continuous, unattended streaming, downloading or uploading of videos, music, or other files or to operate hosting services including, but not limited to, web or gaming hosting; (2) to maintain continuous active network connections to the Internet, for example, through a web camera or machine-to-machine connections that do not involve active participation by a person; (3) to disrupt email use by others using automated or manual routines, including, but not limited to "auto-responders" or cancel bots or other similar routines; (4) to transmit or facilitate any unsolicited or unauthorized advertising, telemarketing, promotional materials, "junk mail," unsolicited commercial or bulk email, or fax; (5) for activities that adversely affect the ability of other people of system to use either enTouch Wireless' or other parties' Internet-based resources, including, but not limited to, "denial of service" (DoS) attacks against another network host or individual user; (6) for an activity that connects any device to Personal Computers (including without limitation, laptops), or other equipment for the purpose of transmitting wireless data over the network (unless customer is using an enTouch Wireless handset designated for such usage); or (7) for any other reason that violates our policy of providing Service for individual use. The prohibited uses in this section also apply to unlimited plans. Unlimited does not mean unreasonable use. If enTouch Wireless finds that you are using an unlimited voice, text, or data Service offering for any of the prohibited uses in this section, enTouch Wireless may at its option terminate your Service or change your plan to one with no unlimited usage components. enTouch Wireless will provide notice that it intends to take any of the above actions, and will give you an opportunity to terminate the Agreement. Unlimited talk and text includes talk and text within the U.S. only.

**MISUSE OF LIFELINE SERVICE:** You have certified your eligibility to receive free services under the federally funded Lifeline program. If your eligibility to participate in this program changes, you agree to immediately notify enTouch Wireless at 1.866.488.8719. Service is provided at our discretion and if terms and conditions are violated we can terminate your wireless service without any further notification or obligation to you.

*No refunds for purchased air time.*

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

#11567