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April 27, 2017

Mr. Gary Widerburg
Commission Administrator
Utah Public Service Commission
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

via FedEx

Re: Blue Jay Wireless, LLC Service Copy of Biennial Audit Attestation Report

To Whom It May Concern:

Pursuant to the requirements of the Federal Communications Commission's Lifeline Reform Order,¹ Blue Jay is required to undergo a biennial audit once every two years² and provide the Attestation Report to all relevant state and Tribal governments within 30 days of receipt of the final report.³ Blue Jay recently underwent such a biennial audit for the time period of January 1 – December 31, 2015.

Blue Jay hereby submits the Attestation Report of the results of the biennial audit, as received on March 31, 2017.

Please contact the undersigned at (202) 360-9864 or lmoxley@bluejaywireless.com if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lauren Moxley".

Lauren Moxley
Chief Compliance Officer
Blue Jay Wireless, LLC

Enclosure

¹ 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,

² *Id.* at 6782, para. 291

³ Biennial Audit Plan, Attachment A, *General Standard Procedures for Biennial Independent Audits Required Under the Lifeline Reform Order.*



March 31, 2017

Moss Adams LLP
3121 West March Lane, Suite 200
Stockton, CA 95219

We are providing this letter in connection with your completion of the agreed-upon procedures surrounding the Lifeline program as provided by Blue Jay Wireless, LLC (the Company).

We confirm, to the best of our knowledge and belief, *as of March 31, 2017*, the following representations made to you during your completion of agreed-upon procedures agreed to in the engagement letter dated August 23, 2016.

1. The Company has made available all records in its control, as a participant in the Lifeline program under the federal USF, necessary to successfully execute the Lifeline agreed-upon procedures attestation engagement.
2. The Company is responsible for complying, and has complied, with requirements relating to 47 C.F.R. Part 54 Subparts B, C and E of the Commission rules governing the administration of the USF for the Lifeline program.
3. Pursuant to Commission's Lifeline rules, the Company has only received reimbursement for each qualifying low-income consumer served, and that the reimbursement amount equals the federal support amount, including amounts described in 47 C.F.R. § 54.403(a) and (c).
4. The Company has no knowledge of any fraud or suspected fraud by management/employees of the ETC related to the administration of the Lifeline program.
5. The Company has responded fully to all inquiries submitted by the auditor in the agreed-upon procedures attestation engagement.
6. The Company has reviewed the draft Attestation Report findings and management letter comments, where applicable, and concur that all non-compliance identified therein are included in the reports or management letters.
7. The Company has no knowledge of any events subsequent to the period of the subject matter being reported on that would have a material effect on the subject matter, or more specifically, the report conclusions provided by the auditor, except as has been disclosed.
8. There have been no notices of action from state or federal regulatory agencies, including the Federal Communications Commission or state public utilities commission that would affect the subject matter, or, more specifically, the report observations provided by the audit firm.


David Wareikis, Chief Executive Officer


Daniel Stark, Chief Financial Officer



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Lauren Moxley, Chief Compliance Officer



March 31, 2017

Moss Adams LLP
3121 West March Lane, Suite 200
Stockton, CA 95219

Report of Management on Compliance with Applicable Requirements of 47 C.F.R. Part 54 of the Federal Communications Commission's Rules, Regulations and Related Orders

Management of Blue Jay Wireless, LLC is responsible for ensuring that the carrier is in compliance with applicable requirements of the Federal Communications Commission (FCC) rules at 47 C.F.R. §§ 54.101, 54.201, and 54.400-54.422 as well as related FCC Orders.

Management has performed an evaluation of the carrier's compliance with the applicable requirements of FCC rules at 47 C.F.R. §§ 54.101, 54.201, and 54.400-54.422, and related FCC Orders with respect to providing discounts to eligible low income consumers and seeking reimbursement from the Universal Service Fund (USF) during the period January 1, 2015 through December 31, 2015 (audit period).

The Carrier makes the following assertions with respect to the provision of Lifeline service during the audit period:

- A. Carrier Obligation to Offer Lifeline – Blue Jay Wireless, LLC asserts that it:
1. is an eligible telecommunications carrier (ETC) (47 C.F.R. § 54.201(a); *Definition of eligible telecommunications carriers, generally*, which discusses carrier eligibility) and provides the services required for eligibility (47 C.F.R. § 54.101(a): *Services designated for support*, and (b): *Requirement to offer all designated services*; which describe the services that an eligible carrier must offer to receive federal universal service support).
 2. makes available Lifeline service, as defined in 47 C.F.R. § 54.401, to qualifying low-income consumers (47 C.F.R. § 54.405(a): *Carrier obligation to offer lifeline*, which discusses carriers' obligations to offer, publicize, notify and allow lifeline services).
 3. publicizes the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. (47 C.F.R. § 54.405(b): *Carrier obligation to offer lifeline* and 47 C.F.R. § 54.201(d)(2): *Definition of eligible telecommunications carriers, generally*, which requires the advertising of the availability of services).
 4. indicates on all materials describing the service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is nontransferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household. For the purposes of this section, the term "materials describing the service" includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms. (47 C.F.R. § 54.405 (c): *Carrier obligation to offer lifeline*).
 5. discloses the name of the eligible telecommunications carrier on all materials describing the service. (47 C.F.R. § 54.405(d): *Carrier obligation to offer lifeline*).



B. Consumer Qualification for Lifeline – Blue Jay Wireless, LLC asserts that it:

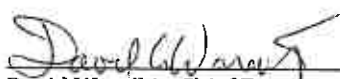
1. maintains policies and procedures that are effectively implemented to review and certify consumer eligibility for Lifeline. (47 C.F.R. § 54.409: *Consumer Qualification for Lifeline*, which discusses the certification and verification requirements). This includes that an officer of the carrier:
 - a. asserts that the carrier has implemented policies and procedures for ensuring that their Lifeline subscribers are eligible to receive Lifeline services. (47 C.F.R. § 54.410: *Subscriber eligibility determination and certification*, which also requires compliance with state certification procedures to document consumer eligibility).

C. Submission of Lifeline Worksheet (Form FCC 497) – Blue Jay Wireless, LLC asserts that it:

1. submitted properly completed FCC Forms 497 for each month, representing discounts actually provided to subscribers, and has the required supporting documentation for the number of subscribers, rates and other information provided on the Form (47 C.F.R. § 54.407: *Reimbursement for offering Lifeline*, which discusses carrier reimbursement for providing Low Income Program support and requires the carrier to keep accurate records in the form directed by USAC and provide the records to USAC).

D. General Recordkeeping and Annual Certification Requirements – Blue Jay Wireless, LLC asserts that:

1. it maintains records to document compliance with all Commission and state requirements governing the Lifeline and Tribal Link Up program for the three full preceding calendar years and provide that documentation to the Commission or Administrator upon request. Notwithstanding the preceding sentence, eligible telecommunications carriers must maintain the documentation required in § 54.410(d) and (f) for as long as the subscriber receives Lifeline service from that eligible telecommunications carrier (47 C.F.R. § 54.417(a)).
2. if it provides Lifeline discounted wholesale services to a reseller, it must obtain a certification from that reseller that it is complying with all Commission requirements governing the Lifeline and Tribal Link Up program. (47 C.F.R. § 54.417(b)).
3. complied with the annual certifications by eligible telecommunication carriers (47 C.F.R. §§ 54.416, 54.522).



David Wareikis, Chief Executive Officer



Daniel Stark, Chief Financial Officer



Lauren Moxley, Chief Compliance Officer