

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Petition of Global Connection)	
Inc. of America dba STAND UP WIRELESS)	
)	Docket No. 13-2432-01
for Designation as an Eligible Telecommunications)	
Carrier in the State of Utah)	
_____)	

**GLOBAL CONNECTION INC. OF AMERICA
DBA STAND UP WIRELESS' SUBMISSION OF
DIRECT TESTIMONY AND EXHIBITS**

Global Connection Inc. of America dba STAND UP WIRELESS (“Stand Up Wireless”), by counsel, files its Direct Testimony and Attachments with the Public Service Commission of Utah in the above-referenced docket. Stand Up Wireless’ Direct Testimony and Attachments include the testimony of Dave Skogen and Attachments 1-2, inclusive, identified therein.

Respectfully submitted this 11th day of November, 2013.

/s/
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dba STAND UP WIRELESS*

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DIRECT TESTIMONY OF DAVE SKOGEN

1 **Q1: WHAT IS YOUR NAME AND OCCUPATION?**

2 **A:** My name is Dave Skogen. I am Chief Executive Officer of Global Connection
3 Inc. of America dba STAND UP WIRELESS (hereinafter referred to as “Stand Up
4 Wireless” or the “Company”).

5 **Q2: WHAT IS STAND UP WIRELESS?**

6 **A:** Global Connection Inc. of America (“Global Connection”) is a Georgia
7 Corporation located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia
8 30093. Global Connection provides local exchange telecommunications services
9 throughout the United States and is designated as an ETC on a wireline basis in
10 Alabama, Arkansas, Florida, Georgia, Louisiana, Michigan, and North Carolina.
11 Global Connection provides commercial mobile radio service (“CMRS”)
12 throughout the United States under its d/b/a, Stand Up Wireless, and provides
13 prepaid wireless telecommunications services to consumers by using the Sprint
14 PCS and Verizon Wireless (“Sprint/Verizon”) networks on a wholesale basis.
15 Stand Up Wireless obtains from Sprint/Verizon, via an agreement with

1 Boomerang Wireless, LLC d/b/a Ready Mobile (“Ready Mobile”), the network
2 infrastructure and wireless transmission facilities to allow the Company to operate
3 as a Mobile Virtual Network Operator (“MVNO”). Stand Up Wireless’ holding
4 company is Global Connection Holdings Corporation, and the Company does not
5 have an operating company or any affiliates.

6 **Q3: WHAT TYPES OF SERVICES DOES THE COMPANY PROVIDE?**

7 **A:** Stand Up Wireless provides prepaid wireless services that are affordable, easy to
8 use, and attractive to low-income and lower-volume consumers, providing them
9 with access to emergency services and a reliable means of communication that
10 can be used both at home and while traveling to remain in touch with friends and
11 family and for contacting prospective employers.

12 **Q4: HOW ARE STAND UP WIRELESS’ SERVICES DIFFERENT FROM**
13 **OTHER CARRIERS’ OFFERINGS?**

14 **A:** Many Stand Up Wireless customers are from low-income backgrounds and did
15 not previously have access to high quality wireless services because of financial
16 constraints or poor credit history. Stand Up Wireless does not conduct credit
17 checks or require customers to enter into long-term service contracts as a
18 prerequisite to obtaining wireless service. Stand Up Wireless will offer customers
19 a certain amount of service free of charge. Stand Up Wireless’ free StandUp 100
20 Lifeline plan includes separate pools of both voice minutes and text minutes, so
21 that customers do not deplete critical voice minutes when they utilize text
22 messaging. Moreover, any unused voice minutes and text messages rollover from
23 month to month on this plan. In addition to StandUp 100, customers will also be

1 permitted to select one of Stand Up Wireless' alternative plans, which offer
2 customers the opportunity to receive more text units and voice units. In addition
3 to wholly-supported voice services, Stand Up Wireless will provide Lifeline
4 customers with access to voice mail, call waiting, three way calling, and Caller ID
5 features at no cost. Also, calls to Stand Up Wireless customer service and calls to
6 911 emergency services are free regardless of available minutes. Customers are
7 not bound by a local calling area requirement; all Stand Up Wireless plans come
8 with domestic long distance at no extra charge and exceptional nationwide digital
9 coverage on the Sprint PCS and Verizon Wireless networks.

10 **Q5: DOES STAND UP WIRELESS CURRENTLY PROVIDE WIRELESS**
11 **TELECOMMUNICATIONS SERVICE IN UTAH?**

12 **A:** No; however, the Company intends to offer non-Lifeline wireless services upon
13 launch of its wireless Lifeline services.

14 **Q6: WILL STAND UP WIRELESS PAY ALL APPLICABLE REGULATORY**
15 **FEES?**

16 **A:** Yes. Stand Up Wireless acknowledges that approval of its Petition may be
17 conditioned upon the verified payment of all applicable state and local regulatory
18 fees, including but not limited to universal service fees, emergency services, and
19 relay services.

20 **Q7: WHAT IS THE NATURE OF STAND UP WIRELESS' ETC**
21 **DESIGNATION REQUEST?**

22 **A:** Stand Up Wireless requests Eligible Telecommunications Carrier ("ETC")
23 designation in Utah solely to provide Lifeline service to qualifying Utah

1 consumers; it will not seek access to funds from the federal USF Link-Up
2 program or high cost program. The Company does not seek access to state USF
3 in the instant petition.

4 **Q8: IN WHAT SERVICE AREAS IS STAND UP WIRELESS SEEKING**
5 **DESIGNATION AS AN ETC?**

6 **A:** Stand Up Wireless requests ETC designation in the wire centers in which Stand
7 Up Wireless has wireless network coverage through its underlying carriers.
8 These wire centers were included as Exhibit 5 of the Company's Petition.

9 **Q9: DOES STAND UP WIRELESS SATISFY THE REQUIREMENTS FOR**
10 **ETC DESIGNATION IN UTAH?**

11 **A:** Yes. Stand Up Wireless satisfies all of the requirements for ETC designation
12 contained in both federal and state regulations. CMRS resellers like Stand Up
13 Wireless are treated as common carriers for regulatory purposes. Stand Up
14 Wireless recognizes that Section 214(e)(1)(A) of the Communications Act of
15 1934, as amended (the "Act"), states that ETCs shall offer services, at least in
16 part, over their own facilities and that the Federal Communications Commission's
17 (FCC) Rules (47 C.F.R. § 54.201(i)) prohibit state commissions from designating
18 as an ETC a telecommunications carrier that offers services exclusively through
19 the resale of another carrier's services. However, the FCC granted forbearance
20 from enforcement of Section 214(e)(1)(A)'s facilities requirement to carriers
21

1 seeking Lifeline-only ETC designation.¹ In accordance with the *Lifeline and Link*
2 *Up Reform Order*, Stand Up Wireless filed its Compliance Plan which the FCC
3 approved on May 25, 2012. A copy of the approved Compliance Plan was
4 attached to the Company's Petition at Exhibit 3. Stand Up Wireless commits to
5 providing Lifeline service in Utah in accordance with the Compliance Plan. 47
6 U.S.C. § 160(e) provides: "[a] State commission may not continue to apply or
7 enforce any provision of this chapter that the [Federal Communications]
8 Commission has determined to forbear from applying under subsection (a) of this
9 section." As such, the Commission is required to act in accordance with the
10 FCC's grant of forbearance, and therefore may not apply the facilities-based
11 requirement to Stand Up Wireless.

12 **Q10: HAS STAND UP WIRELESS BEEN DESIGNATED AS AN ETC IN ANY**
13 **OTHER STATES?**

14 **A:** Yes. Stand Up Wireless has been designated as an ETC in Arkansas, Arizona,
15 Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Maryland,
16 Massachusetts, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania,
17 Puerto Rico, South Carolina, Texas, Wisconsin and West Virginia and currently
18 has applications for ETC designation pending with California, Idaho, Indiana,
19 Mississippi, New Jersey, Rhode Island and the FCC (for the states of Alabama,
20 Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New
21 York, North Carolina, Tennessee, Texas and Virginia). Stand Up Wireless has

¹ See *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*") ¶ 368.

1 not been denied ETC status by any regulatory authority.

2 **Q11: WHAT FUNCTIONS WILL STAND UP WIRELESS OFFER TO**
3 **SUBSCRIBERS ONCE GRANTED ETC STATUS?**

4 **A:** Stand Up Wireless offers, or will offer upon designation as an ETC in Utah, all of
5 the services and functionalities required by the FCC's rules:

6 a. *Voice-grade access to the public switched network.* Stand Up
7 Wireless meets this requirement by providing voice grade access to the
8 public switched telephone network through the purchase of wholesale
9 CMRS services from Sprint/Verizon.

10 b. *Minutes of Use for Local Service.* ETCs must provide minutes of
11 use for local service provided at no additional charge to end users. Stand
12 Up Wireless offers a variety of rate plans that provide its customers with
13 minutes of use for local service at no additional charge. It is important to
14 note that currently, the FCC has not adopted any minimum local service
15 requirements.

16 c. *Access to emergency services.* ETCs must provide access to the
17 emergency services provided by local government or other public safety
18 organizations, such as 911 and enhanced 911 (E911), to the extent the
19 local government in an eligible carrier's service area has implemented
20 911 or E911 systems. Stand Up Wireless currently provides 911 and
21 E911 access for all of its customers, and will continue to comply with all
22 FCC E911 requirements applicable to wireless resellers.

1 d. *Toll limitation for qualifying low-income consumers.* The FCC has
2 stated that toll limitation would no longer be deemed a supported service.
3 Nonetheless, Stand Up Wireless’ offerings inherently allow Lifeline
4 customers to control their usage, as its wireless service is offered on a
5 prepaid basis. Moreover, the nature of Stand Up Wireless’ service
6 mitigates the need for toll control. Stand Up Wireless’ service is not
7 offered on a distance-sensitive basis and minutes are not charged
8 separately for local or domestic long distance services.

9 e. *Other services.* While no longer required by 47 C.F.R. §
10 54.101(a), Stand Up Wireless provides dual tone multi-frequency
11 (“DTMF”) signaling to expedite the transmission of call set up and call
12 detail information throughout the network, single party service for the
13 duration of each telephone call and not multi-party (or “party-line”)
14 services, access to operator services, the ability to make interexchange, or
15 long distance, telephone calls, and access to directory assistance services
16 by dialing “411” from the provided wireless handsets.

17 **Q12: HOW QUICKLY CAN STAND UP WIRELESS COMMENCE SERVICE?**

18 **A:** Stand Up Wireless’ underlying providers’ networks are operational and largely
19 built out. Thus, Stand Up Wireless will be able to commence offering its service
20 to all locations served by its underlying carriers very soon after receiving ETC
21 designation from the Commission. In accordance with 47 CFR §54.202(a)(1)(i),
22 Stand Up Wireless commits to comply with the service requirements applicable
23 to the support that it receives.

1 **Q13: WILL STAND UP WIRELESS SATISFY APPLICABLE CONSUMER**
2 **PROTECTION AND SERVICE QUALITY STANDARDS?**

3 **A:** Stand Up Wireless' service is of the same quality and reliability as that of its
4 underlying carriers. To demonstrate its commitment to high service quality,
5 Stand Up Wireless commits to comply with the Cellular Telecommunications and
6 Internet Association's (CTIA) Consumer Code for Wireless Service. A copy of
7 the CTIA Code is attached as Attachment 1.

8 **Q14: IS STAND UP WIRELESS ABLE TO REMAIN FUNCTIONAL IN**
9 **EMERGENCY SITUATIONS?**

10 **A:** In accordance with 47 CFR §54.202(a)(2), Stand Up Wireless, through its
11 underlying carriers, has the ability to remain functional in emergency situations.
12 Through its agreement with its underlying carriers, Stand Up Wireless provides to
13 its customers the same ability to remain functional in emergency situations as
14 currently provided by Sprint/Verizon to its own customers, including access to a
15 reasonable amount of back-up power to ensure functionality without an external
16 power source, the ability to reroute traffic around damaged facilities, and the
17 capability of managing traffic spikes resulting from emergency situations.

18 **Q15: HOW DOES STAND UP WIRELESS INTEND TO ADVERTISE THE**
19 **AVAILABILITY OF THE SUPPORTED SERVICES?**

20 **A:** Stand Up Wireless will advertise the availability and rates for the services
21 described above using media of general distribution as required by Section
22 54.201(d)(2) of the FCC's regulations. Stand Up Wireless will comply with
23 requirements set forth in the FCC's *Lifeline and Link Up Reform Order*, as

1 outlined in the Company's FCC-Approved Compliance Plan. The Company will
2 advertise its services in a manner reasonably designed to reach those likely to
3 qualify for Lifeline services, using mediums for outreach such as mass media,
4 outreach events, and community and charitable involvement. The Company will
5 engage in advertising campaigns promoting the availability of cost-effective
6 wireless services to this neglected consumer segment. Stand Up Wireless may
7 also promote the availability of its Lifeline offering by distributing brochures at
8 various state and local social service agencies, and may partner with nonprofit
9 assistance organizations in order to inform customers of the availability of its
10 Lifeline service. In addition, Stand Up Wireless will utilize its network of retail
11 partners to help promote the availability of its Lifeline plans, especially those
12 retail outlets that are frequented by low income consumers; examples include
13 Western Union and MoneyGram locations, independent operators including
14 insurance providers, check cashing locations and select discount retailers.

15 **Q16: IS STAND UP WIRELESS FINANCIALLY AND TECHNICALLY**
16 **CAPABLE?**

17 **A:** Yes. Global Connection has been offering non-Lifeline and Lifeline wireline
18 service since 1998 and began providing non-Lifeline and Lifeline-supported
19 wireless service in April 2011. The Company generates substantial revenues from
20 non-Lifeline services and has access to capital from its investors. The majority
21 owner of Global Connection is Milestone Partners, a Pennsylvania private equity
22 firm. Consequently, Global Connection has not relied, and will not be relying
23 exclusively on Lifeline reimbursement for the Company's operating revenues.

1 The Company has not been subject to enforcement sanctions or ETC revocation
2 proceedings in any state. Furthermore, the senior management of Stand Up
3 Wireless has great depth in the telecommunications industry and offers extensive
4 telecommunications business technical and managerial expertise to the Company.
5 Key management bios were attached to the Company's Petition as Exhibit 6.

6 **Q17: WILL STAND UP WIRELESS COMPLY WITH THE LIFELINE**
7 **CERTIFICATION AND VERIFICATION REQUIREMENTS?**

8 **A:** Yes. Stand Up Wireless will certify and verify consumer eligibility in accordance
9 with the FCC's requirements, as revised in the *Lifeline and Link Up Reform*
10 *Order*, and with applicable Commission rules, and will comply with the outcome
11 of Commission Docket No. 10-2528-01.

12 **Q18: HOW WILL STAND UP WIRELESS CERTIFY THAT A CUSTOMER IS**
13 **ELIGIBLE FOR THE FEDERAL LIFELINE DISCOUNT?**

14 **A:** During the enrollment process, applicants will be directed to a toll-free telephone
15 number and to Stand Up Wireless' website, which will contain information
16 regarding the Company's Lifeline services, including a detailed description of the
17 program and state-specific eligibility criteria. Customers may then request that an
18 enrollment form be mailed to them, or they can download a form from the
19 internet or retrieve a form in person at a Company event. The Company's
20 certification form will require all consumers, at sign up and annually thereafter, to
21 provide the information and certifications, under penalty of perjury, required by
22 revised CFR § 54.410(d). Stand Up Wireless will utilize available federal or
23 state eligibility databases to check an applicant's eligibility for Lifeline, or in the

1 absence of such a database will require applicants to provide documentation
2 showing proof of their participation in a qualifying program or proof of income
3 eligibility. Stand Up Wireless will annually re-certify the continued eligibility of
4 all of its subscribers.

5 **Q19: DOES STAND UP WIRELESS USE A THIRD PARTY ADMINISTRATOR**
6 **TO ASSIST WITH ITS LIFELINE SERVICES?**

7 **A:** Yes. Stand Up Wireless has contracted with CGM, LLC of Roswell, Georgia, a
8 lifeline service bureau, to edit all subsidy request data. CGM will process and
9 validate the Company's subsidy data to prevent: (1) Duplicate Same-Month
10 Lifeline Subsidies (Double Dip): any name/address that is already receiving a
11 lifeline subsidy from the Company will be automatically prevented from receiving
12 a second lifeline subsidy in that same month; and (2) Inactive lines receiving
13 subsidy: CGM's systems compare all subsidy requests to underlying network
14 status to ensure that subsidies are requested only for active lines. Through the
15 process described above, Stand Up Wireless ensures that it does not over-request
16 from support funds.

17 **Q20: WHAT MEASURES DOES STAND UP WIRELESS PLAN TO TAKE TO**
18 **PREVENT RECOVERY OF THE FEDERAL LIFELINE DISCOUNT FOR**
19 **CUSTOMERS ALREADY RECEIVING THE DISCOUNT FOR THEIR**
20 **LANDLINE TELEPHONE?**

21 **A:** Stand Up Wireless application forms will inform customers of the one-per-
22 household limitation, and will require each applicant to provide their name, primary
23 residential address and an alternate telephone number (if any). Stand Up Wireless

1 will incorporate this information into its customer information database. The
2 Company will check the name and address of each Lifeline applicant against its
3 database to determine whether or not it is associated with a customer that already
4 receives Stand Up Wireless Lifeline service, and will then review the application to
5 ascertain whether the applicant is attempting to receive Lifeline-supported service
6 for more than one handset associated with the address. Stand Up Wireless will
7 deny the Lifeline application of any such individual and advise the applicant of the
8 basis for the denial. Applicants must self-certify, under penalty of perjury, at the
9 time of service activation and annually thereafter, that they receive Lifeline-
10 supported service only from Stand Up Wireless. In addition, Stand Up Wireless
11 will utilize the as the National Lifeline Accountability Database, once available,
12 and the Department of Community and Culture's knowledge and databases (or
13 the provider of verification services established through Docket No. 10-2508-01)
14 to ensure as accurately as possible that only one individual per household is
15 receiving the subsidy, and that applicants are not already receiving Lifeline
16 support from any other carrier.

17 **Q21: WHAT MEASURES DOES STAND UP WIRELESS PLAN TO TAKE TO**
18 **PREVENT RECOVERY OF LIFELINE FUNDS FOR PREPAID**
19 **CUSTOMERS WHO CEASE USING STAND UP WIRELESS PHONES**
20 **AND AIRTIME?**

21 **A:** Stand Up Wireless recognizes the importance of safeguarding the USF.
22 Therefore, the Company has implemented the following 60-day non-usage policy
23 in an effort to avoid waste, fraud, and abuse of the program. After 60 days of

1 nonuse, the Company will provide notice to the subscriber that failure to use the
2 Lifeline service within a 30-day notice period will result in de-enrollment.
3 Subscribers can “use” the service by: (1) completing an outbound call; (2)
4 purchasing minutes from the Company to add to the subscriber’s plan; (3)
5 answering an incoming call from a party other than the Company; or (4)
6 responding to a direct contact from the Company and confirming that the
7 subscriber wants to continue receiving the service. If the subscriber does not
8 respond to the notice, the subscriber will be de-enrolled and the Company will not
9 request further Lifeline reimbursement for the subscriber.

10 **Q22: WHAT ARE THE RATES AND TERMS OF STAND UP WIRELESS’**
11 **LIFELINE SERVICE OFFERING?**

12 **A:** Attachment 2 is a summary table of the Company’s proposed Lifeline offering.
13 The “StandUp 100” free Lifeline plan includes separate pools of 100 voice
14 minutes and 100 text minutes which rollover from month to month. The
15 “StandUp 250” free Lifeline plan includes 250 units, which may be used
16 interchangeably for voice minutes or text messages and do not rollover. In
17 addition to free plans, customers will also be permitted to select one of Stand Up
18 Wireless’ alternative retail rate plans which offer more text units and voice units,
19 to which Stand Up Wireless will apply a discount of \$12.75 per month, including
20 the maximum federal Lifeline subsidy (currently \$9.25).

21 In addition to voice services, prepaid Lifeline customers will receive a free
22 handset and the following Custom Calling features at no charge: Caller ID, Call
23 Waiting, 3-Way Calling, and Voicemail. Customers may use their minutes to

1 place domestic long distance calls at no additional charge. Calls to 911
2 emergency services are always free, and calls to Stand Up Wireless customer
3 service made by customers via their Stand Up Wireless handset will not deplete
4 the customer's available airtime. At this time additional credits may be
5 purchased at the rate of \$5.00 for 40 credits; \$10.00 for 100 credit; \$20.00 for 250
6 credits, \$30.00 for 500 credits; and \$50.00 for 1000 credits. Stand Up Wireless'
7 prepaid offering will be an attractive alternative for consumers who need the
8 mobility, security, and convenience of a wireless phone, but who are concerned
9 about usage charges or long-term contracts.

10 **Q23: DOES STAND UP WIRELESS INTEND TO PROVIDE QUALIFIED**
11 **LIFELINE CUSTOMERS WITH A FREE HANDSET?**

12 **A:** Yes, Stand Up Wireless Lifeline customers will receive an E911-compliant
13 wireless handset at no charge. All wireless handsets issued by Stand Up Wireless
14 are capable of accessing 911 services without charge regardless of activation
15 status and availability of minutes.

16 **Q24: HOW WILL CUSTOMERS KNOW IN ADVANCE THE NUMBER OF**
17 **FREE MINUTES THEY WILL HAVE AND WHEN MORE WILL BE**
18 **ADDED?**

19 **A:** Lifeline customers will be given materials at enrollment that describe the number
20 of minutes/credits they receive and when the minutes/credits will be replenished.
21 Stand Up Wireless customers can check the balance of their minutes either online
22 or by calling customer service.

23

1 **Q25: WHAT HAPPENS TO THE CUSTOMER'S PHONE SERVICE AFTER**
2 **THE FREE MINUTES HAVE BEEN UTILIZED?**

3 **A:** Once the minutes have been utilized, customers will either have to wait until the
4 next month for a new allotment of minutes of free air time or they can purchase
5 additional minutes at any time.

6 **Q26: HOW WILL CUSTOMERS COMMUNICATE WITH STAND UP**
7 **WIRELESS REGARDING QUESTIONS, CONCERNS OR**
8 **COMPLAINTS?**

9 **A:** Stand Up Wireless commits to exceptional customer service standards. Customers
10 are able to contact the Company via a toll free number or by dialing 611 from
11 their Stand Up Wireless phone. They will also be able to contact Customer
12 Service via the Company's website or by mail. Stand Up Wireless is committed
13 to resolving customer questions, concerns and complaints in a swift and
14 satisfactory manner.

15 **Q27: HOW WILL STAND UP WIRELESS' PRESENCE AS AN ETC IN UTAH**
16 **SERVE THE PUBLIC INTEREST?**

17 **A:** A central purpose of the Telecommunications Act of 1996 was to “promote
18 competition and reduce regulation ... to secure lower prices and higher quality
19 services ... and encourage the rapid deployment of new telecommunications
20 technologies” to all citizens, regardless of geographic location or income.²
21 Designation of Stand Up Wireless as an ETC would further these goals. Stand
22 Up Wireless' Lifeline service will provide low-income Utah residents with the
23 convenience and security offered by wireless services—even if their financial

² The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

1 position deteriorates.

2 The public interest benefits of the Company's wireless service include
3 larger local calling areas (as compared to traditional wireline carriers), the
4 convenience and security afforded by mobile telephone service, the opportunity
5 for customers to control cost by receiving a preset amount of monthly airtime at
6 no charge, the ability to purchase additional usage at flexible and affordable
7 amounts in the event that included usage has been exhausted, 911 service and,
8 where available, E911 service in accordance with current FCC requirements.
9 Stand Up Wireless' Lifeline plan will not only allow feature-rich mobile
10 connectivity for qualifying subscribers, but will also bring competition and more
11 variety of options into the reach of Lifeline customers. Stand Up Wireless'
12 Lifeline rate plans are comparable in minutes and features to those available to
13 Utah post-paid wireless subscribers – but at low Lifeline rates and without the
14 burden of credit checks, contracts, activation fees or roaming charges.

15 Without question, prepaid wireless services have become essential for
16 low-income customers, providing them with value for their money, access to
17 emergency services on wireless devices, and a reliable means of contact for
18 prospective employers, social service agencies or dependents. Providing Stand
19 Up Wireless with the authority necessary to offer discounted Lifeline services to
20 those most in danger of losing wireless service altogether undoubtedly promotes
21 the public interest.

22

1 **Q28: WHAT ARE SOME OF THE BENEFITS OF INCREASED**
2 **COMPETITIVE CHOICE?**

3 **A:** Introducing Stand Up Wireless as an additional ETC provider into the market will
4 afford low income Utah residents a wider choice of providers and available
5 services while enhancing the competitive marketplace as ETCs compete for a
6 finite number of Lifeline-eligible customers. Increasing the competitive
7 marketplace of providers has the potential to effectively increase the penetration
8 rate and reduce the number of individuals not connected to the PSTN, while
9 helping to assure that quality services are available at just, reasonable, and
10 affordable rates. As of December 31, 2011, only between 20-50% of consumers
11 eligible for Lifeline Service in the State of Utah were being provided such
12 services.³ Stand Up Wireless believes that it will be able to increase awareness of
13 and participation in the Lifeline program.

14 **Q29: IF STAND UP WIRELESS' PETITION IS GRANTED, WILL THERE BE**
15 **ANY IMPACT ON THE UNIVERSAL SERVICE FUND?**

16 **A:** With Lifeline, ETCs only receive support for customers they obtain. The amount
17 of support available to an eligible subscriber is exactly the same whether the
18 support is given through a company such as Stand Up Wireless or the Incumbent
19 LEC operating in the same service area. Stand Up Wireless will only increase the
20 amount of USF Lifeline funding in situations where it obtains Lifeline customers
21 not enrolled in another ETC's Lifeline program. By implementing the safeguards
22 set forth in the *Lifeline and Link Up Reform Order*, Stand Up Wireless will
23 minimize the likelihood that its customers are not eligible or are receiving

³ See Exhibit 4 of the Company's Petition.

1 duplicative support either individually or within their household. Significantly,
2 Stand Up Wireless' ability to increase the Lifeline participation rate of qualified
3 low-income individuals will further the goal of Congress to provide all
4 individuals with affordable access to telecommunications service, and thus any
5 incremental increases in Lifeline expenditures are far outweighed by the
6 significant public interest benefits of expanding the availability of affordable
7 wireless services to low-income consumers.

8 **Q30: DOES STAND UP WIRELESS AGREE TO COMPLY WITH ALL**
9 **COMMISSION RULES AND REGULATIONS REGARDING ETC?**

10 **A:** Yes. Stand Up Wireless hereby asserts its willingness and ability to comply with
11 all the rules and regulations that the Commission may lawfully impose upon the
12 Company's provision of service contemplated by its petition for ETC designation.
13 Stand Up Wireless also commits to use a Utah-specific fact sheet that provides
14 customers concise and complete information about the services they will receive;
15 a draft fact sheet was attached to the Company's Petition as Exhibit 7.

16 **Q31: IS THERE ANYTHING ELSE YOU WOULD LIKE TO ADD TO YOUR**
17 **TESTIMONY?**

18 **A:** I would like to reiterate that Stand Up Wireless meets all legal requirements for
19 designation as an ETC. Accordingly, the Commission should promptly grant
20 Stand Up Wireless' petition for ETC designation so that Stand Up Wireless may
21 commence providing service to qualified low-income Utah households at the
22 earliest possible time.

