

dw#

Docket No. 15-999-04



UTAH PUBLIC
SERVICE COMMISSION

2015 APR -7 A 9:56

RECEIVED

April 2, 2015

Utah Public Service Commission
Herber M. Wells Building
160 East 300 South
Salt Lake City, UT 84114

Re: Docket 12-2553-01-FCC Biennial Audit Report filed on behalf of Telrite Corporation d/b/a Life Wireless

Dear Commission:

On April 2, 2014 the Wireline Competition Bureau of the Federal Communications Commission ("FCC") published its Final Lifeline Biennial Audit Plan. In this plan they established standard procedures for ETCs receiving \$5 million or more receiving \$5 million or more annually from the low-income universal service support.

Following these standards, the audits have to be conducted by independent audit firms that must be licensed, certified public accounting firms and must conduct the audits consistent with Generally Accepted Government Auditing Standards ("GAGAS") using agreed-upon procedures ("AUP") attestations. To ensure compliance with the Commission's Lifeline requirements, the Universal Service Administrative Company (USAC) conducted training for these independent auditors.

Yesterday Telrite filed the biennial audit report with the FCC and USAC which is the report issued by the independent CPA firm, Moss-Adams LLP, regarding the biennial audit corresponding to the calendar year 2013. The audit reviewed operations in Nevada, Puerto Rico and Oklahoma. Please find attached a copy of the Final Biennial Audit report.

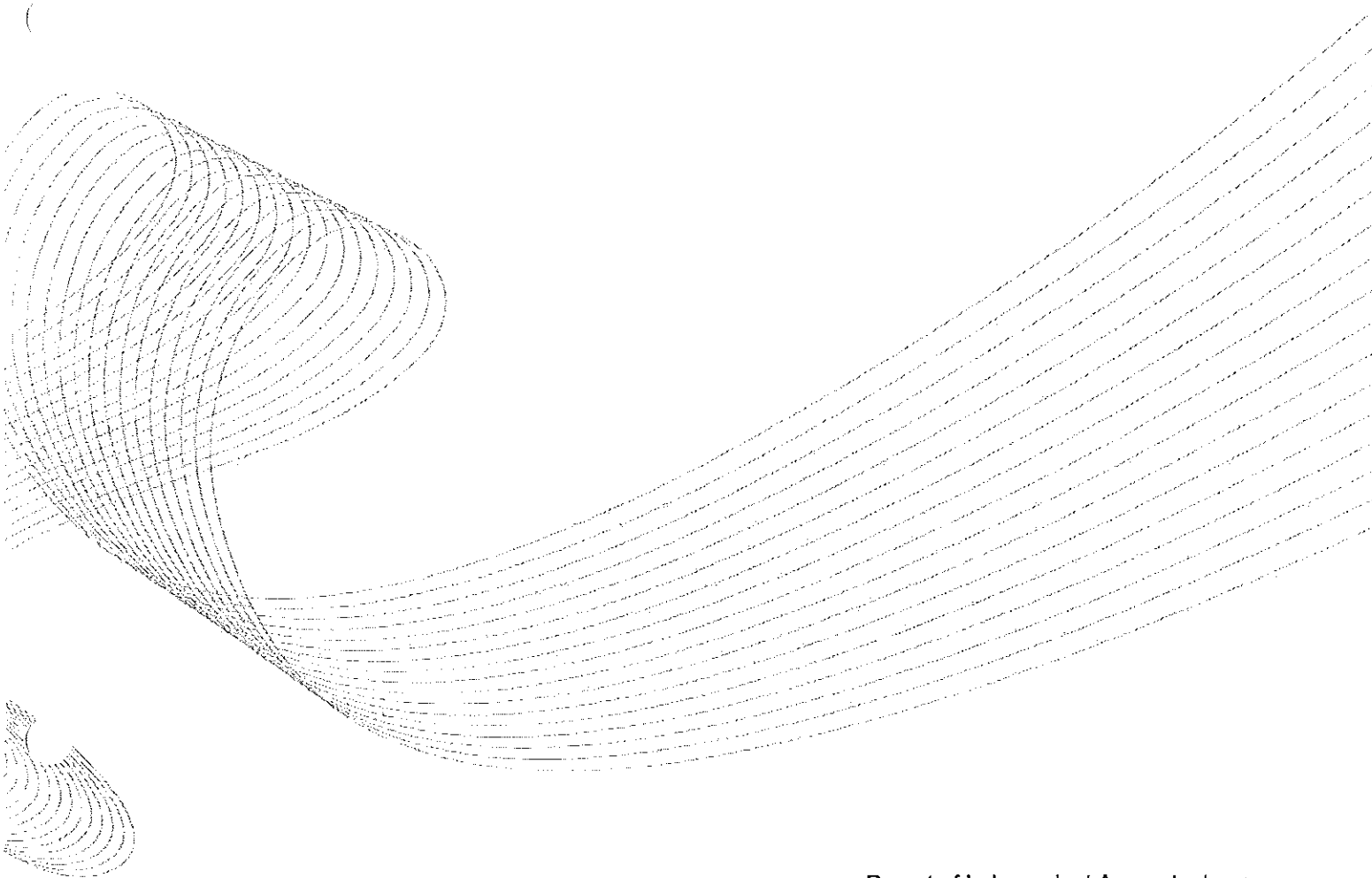
An extra copy of this letter is enclosed to be date-stamped and returned to us in the self-addressed, postage-paid envelope.

If you have any questions regarding this filing, please contact me at (407) 260-1011 or regulatory@csilongwood.com.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Mark Lammert".

Mark Lammert
Attorney-in-Fact
Telrite Corporation d/b/a Life Wireless



Report of Independent Accountants on
Applying Agreed-Upon Procedures

Telrite Corporation

December 31, 2013

MOSS ADAMS_{LLP}

Certified Public Accountants | Business Consultants



MOSS ADAMS LLP
Certified Public Accountants | Business Consultants

**REPORT OF INDEPENDENT ACCOUNTANTS
ON APPLYING AGREED-UPON PROCEDURES**

To the Managements of Telrite Corporation, the Universal Service Administrative Company (USAC), and the Federal Communications Commission (FCC or Commission):

We have performed the procedures enumerated in Attachment A, which were agreed to by the FCC's Wireline Competition Bureau (Bureau) and Office of Managing Director (OMD) in the Lifeline Biennial Audit Plan or as otherwise directed by the Bureau, solely to assist you in evaluating Telrite Corporation's compliance with certain regulations and orders governing the Low Income Support Mechanism (also known as the Lifeline Program) of the Universal Service Fund, set forth in 47 C.F.R. Part 54, as well as other program requirements, including any state-mandated Lifeline requirements (collectively, the Rules) detailed in the Lifeline Biennial Audit Plan for the calendar year ended December 31, 2013. Telrite Corporation's management is responsible for compliance with the Rules. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Generally Accepted Government Auditing Standards (GAGAS) issued by the Government Accountability Office (2011 Revision). The sufficiency of these procedures is solely the responsibility of the Bureau and OMD. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment A either for the purpose for which this report has been requested or for any other purpose.

Specific procedures and related results are enumerated in Attachment A to this report. In compliance with the Lifeline Biennial Audit Plan, this report does not contain any personally identifiable information or individually identifiable customer proprietary network information.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on Telrite Corporation's compliance with the Rules. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the managements of Telrite Corporation, USAC, and the FCC, and is not intended to be and should not be used by anyone other than these specified parties. This report becomes a matter of the public record upon filing of the final report with the FCC. The final report is not confidential.

Moss Adams LLP

Stockton, California
March 31, 2015

Attachment A enumerates the agreed-upon procedures for Telrite Corporation, the associated results, and any management responses obtained in relation to the exceptions identified.

Objective 1: Carrier Obligation to Offer Lifeline

Procedure 1

Moss Adams LLP inquired of management on February 19, 2015 and obtained the carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for offering Lifeline service to qualifying low-income consumers.

Moss Adams LLP examined the carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Lifeline rules set forth in Appendix F of the Lifeline Biennial Audit Plan.

Moss Adams LLP noted no discrepancies between the carrier's policies and procedures, management's responses to the inquiries, and the Commission's Lifeline rules.

No exceptions noted.

Procedure 2

Moss Adams LLP inspected 10 examples of carrier marketing materials describing the Lifeline service (i.e., print, audio, video and web materials used to describe or enroll in the Lifeline service offering, including standard scripts used when enrolling new subscribers, application and certification forms), as provided in response to Items 4, 6, and 7 of Appendix A of the Lifeline Biennial Audit Plan.

Moss Adams LLP noted the inspected marketing materials contained the required disclosures per 47 C.F.R. Section 54.405(c)(d).

No exceptions noted.

Procedure 3

Moss Adams LLP inspected 10 randomly selected recorded calls out of the 50 recorded calls servicing the Eligible Telecommunications Carrier's (ETC) Lifeline subscribers, as provided in response to Item 8 of Appendix A, noting that the telephone number involves the use of interactive voice response, a live customer care operator is available, the time spent using the customer care telephone service, and the calls can be used to notify the ETC of the subscriber's intent to cancel service or give notification that the subscriber is no longer eligible to receive service.

Moss Adams LLP noted that statements by an ETC representative (recorded or live) in the recorded calls did not mislead the subscriber or conflict with the Rules per 47 C.F.R. Section 54.

No exceptions noted.

Procedure 4

Moss Adams LLP inspected applicable policies and procedures regarding de-enrollment from the program when the ETC de-enrolls subscribers based on lack of eligibility, duplicate support, non-usage, and failure to recertify.

Moss Adams LLP inspected policies and procedures for de-enrollment where ETC had information indicating that a Lifeline subscriber no longer met the criteria to be considered a qualifying low-income consumer under 47 C.F.R. §54.409, as provided in response to Item 4 of Appendix A.

Moss Adams LLP noted the policies and procedures included, but were not limited to: (1) notifying subscriber of impending termination of service; (2) allowing subscriber to demonstrate continued eligibility; and (3) terminating of service for failure to demonstrate eligibility, and there were no areas that were not in compliance with section 54.405(e)(1) of the Commission's rules.

Moss Adams LLP inspected the carrier's policies and procedures for de-enrolling subscribers that are receiving Lifeline service from another ETC or where more than one member of a subscriber's household is receiving Lifeline service (duplicative support).

Moss Adams LLP noted the policies and procedures stated that the ETC will de-enroll subscribers within five business days of receiving notification from USAC program management that a subscriber or a subscriber's household is receiving duplicative Lifeline support, as required by section 54.405(e)(2) of the Commission's rules.

Moss Adams LLP inspected the carrier's policy and procedures for de-enrolling subscribers for non-usage (i.e., where a Lifeline subscriber fails to use Lifeline service for 60 consecutive days), including the process of how the carrier monitors and identifies subscribers who are non-users of Lifeline service but enrolled in the program.

Moss Adams LLP noted the written policies and procedures (if any), background questionnaire responses, internal control questionnaire responses, and ETC management's responses are in compliance with the Rules per 47 C.F.R. Section 54.405(e)(3) and/or 54.407(c)(2).

Moss Adams LLP noted the ETC provided examples of non-usage termination notices (or templates in lieu of individual notices) in accordance with the documentation retention requirements per 47 C.F.R. Section 54.417(a).

Moss Adams LLP noted the non-usage termination notices comply with the Rules per 47 C.F.R. Sections 54.405(e)(3) and/or 54.407(c)(2).

Moss Adams LLP noted the ETC sends the following text to customers as the non-usage termination notice of individual requests as an example of recertification provided to the subscriber. The text reads: "Your Life Wireless account is about to be DISCONNECTED for non usage. Your account will be suspended for 30 days and then permanently disconnected. Please call 611 immediately if you want to keep your service."

Moss Adams LLP reviewed the carrier's policy and procedures for de-enrolling a Lifeline subscriber that does not respond to the carrier's attempts to obtain recertification, as part of the annual eligibility recertification process.

Moss Adams LLP examined the carrier's policies and procedures and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Lifeline rules set forth in Appendix F of the Lifeline Biennial Audit Plan.

Moss Adams LLP noted no discrepancies between the carrier's policies and procedures, management's responses to the inquiries, and the Commission's Lifeline rules per 47 C.F.R. Section 54.405(e)(4).

Moss Adams LLP inspected the sampled notice of impending de-enrollment letters (or templates in lieu of individual requests) and verified that the communications explain that the subscriber has 30 days following the date of the notice of impending de-enrollment letter to demonstrate continued eligibility or the carrier will terminate the subscriber's Lifeline service.

Moss Adams LLP noted no instances where de-enrollment letters did not include an explanation that the subscriber has 30 days following the date of the notice of impending de-enrollment letter to demonstrate continued eligibility or the carrier will terminate the subscriber's Lifeline service.

Moss Adams LLP reviewed the de-enrollment letters (or templates in lieu of individual requests), other forms of communications, and the carrier's responses to the background questionnaire and verified that the de-enrollment letters were sent by a method separate from the subscriber's bill.

Moss Adams LLP noted no instances where the de-enrollment letters were not sent by a method separate from the subscriber's bill.

Moss Adams LLP attached a copy of templates of recertification letters, de-enrollment notices and texts of individual requests for recertification as an example of de-enrollment letters provided to the subscriber. See Attachment B.

No exceptions noted.

Objective II: Consumer Qualification for Lifeline

Procedure 1

Moss Adams LLP inquired of management on February 19, 2015 and obtained the carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for limiting Lifeline support to a single subscription per household.

Moss Adams LLP examined the carrier's policies and procedures and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Lifeline rules set forth in 54.409(c) (Appendix F) of the Lifeline Biennial Audit Plan.

Moss Adams LLP noted no discrepancies between the carrier's policies and procedures, management's responses to the inquiries, and the Commission's Lifeline rules.

No exceptions noted.

Procedure 2

Moss Adams LLP inquired of management on February 19, 2015 and reviewed procedures the carrier had in place to ensure it accurately completed the FCC Form 497. The policy and procedures included the following:

- The position title of the person responsible for obtaining data for the FCC Form 497;
- The process for determining which subscribers should be included monthly in the FCC Form 497. Verify the procedures include cut-off and billing cycle dates, and only those subscribers active as of the start or end of the month;
- That a corporate officer signature is required for the FCC Form 497;
- That a verification process exists to perform an independent review; that is, the person reviewing or validating the form's data is different from the person completing the form;
- Provides the billing system name used to generate completion of the form; and
- If applicable, describes the process for completing the Tribal Link Up portions of the FCC Form 497.

Moss Adams LLP noted the carrier had policies and procedures in place to ensure it accurately completed the FCC Form 497.

No exceptions noted.

Procedure 3

Moss Adams LLP obtained the Subscriber List in response to Item 1 of Appendix A and obtained the carrier's FCC Form 497 (s) for each study area for Nevada, Oklahoma, and Puerto Rico.

Moss Adams LLP examined the number of subscribers claimed on the Form(s) 497 for each study area in Nevada, Oklahoma, and Puerto Rico and compared the number of subscribers reported on the Form 497 to the number of subscribers contained on the Subscriber List for each study area.

Moss Adams noted the number of subscribers reported on the FCC Form 497 agreed to the number of subscribers contained in the Subscriber List provided in response to Item 1 of Appendix A.

No exceptions noted.

Procedure 4

Moss Adams LLP used computer-assisted audit techniques to examine the Subscriber List for duplicate addresses with different subscribers.

Moss Adams LLP created a list duplicate addresses with different subscribers which was sampled as part of Objective II Procedure 5 below.

Procedure 5

Moss Adams LLP randomly selected 30 subscribers from the list of duplicates and requested copies of the one-per-household certification form for each of the selected subscribers and verified the selected subscriber certified to only receiving one Lifeline-supported service in his/her household.

Moss Adams LLP noted the selected subscribers certified to only receiving one Lifeline supported service in the household using the one-per-household worksheet, or certification form if the subscriber was the first subscriber to reside at an address.

Moss Adams LLP noted no missing or incomplete certifications.

No exceptions noted.

Objective III: Subscriber Eligibility Determination and Certification

Procedure 1

Moss Adams LLP inquired of management on February 19, 2015 and obtained the carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for ensuring that its Lifeline subscribers are eligible to receive Lifeline services.

Moss Adams LLP examined the carrier's policies and procedures and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Lifeline rules set forth in 54.410 (Appendix F) of the Lifeline Biennial Audit Plan.

Moss Adams LLP noted no discrepancies between the carrier's policies and procedures, management's responses to the inquiries, and the Commission's Lifeline rules.

Moss Adams LLP inspected the ETC's policies and noted evidence of a policy indicating the ETC does not retain copies of subscribers' proof of income- or program-based eligibility, unless required to do so by a state commission.

Moss Adams LLP inspected the ETC's policies and noted evidence of policies and procedures that the ETC must fully verify the eligibility of each low-income consumer prior to providing Lifeline service to the consumer, and that the ETC or its agents may not provide the consumer with an activated device intended to enable access to Lifeline service until that consumer's eligibility is fully verified and all other necessary enrollment steps have been completed.

No exceptions noted.

Procedure 2

Moss Adams LLP examined the ETC's policies and procedures for training employees and agents for ensuring that the ETC's Lifeline subscribers are eligible to receive Lifeline services, including any policies regarding how the company ensures employees and agents have completed the training.

Moss Adams LLP noted ETC offers comprehensive trainings which include, but are not limited to, teaching representatives about the Lifeline program, what makes an individual eligible for Lifeline, what proof of eligibility and identification is required, what the one-per-household rule is, what information provided by the applicant needs to be recorded and in what form, what information needs to be communicated to the applicant about eligibility and the program, and the consequences of not following Telrite's procedures to ensure full compliance with Lifeline requirements. To ensure understanding, the training includes visual examples of documents acceptable to demonstrate eligibility for the Lifeline program. Employee acknowledgements are kept as evidence of completion of training either in electronic or paper form. Updated trainings are provided as necessary for changes in policies, procedures, or regulations. Additional training is provided as corrective action training if there are findings in the internal audits.

Moss Adams LLP noted the written policies and procedures (if any), background questionnaire responses, internal control questionnaire responses, and ETC management's responses comply with the Rules per 47 C.F.R. Section 54.409 and 54.410.

No exceptions noted.

Procedure 3

Moss Adams LLP randomly selected 100 subscribers from the subscriber list provided in response to item 1 of Appendix A, and tested the subscriber's certification and recertification forms for information listed in Objective III Procedure 3.

Moss Adams LLP examined the subscriber certification and recertification forms for the first 50 subscribers sampled noting the following:

The ETC did provided the subscriber certification forms, subscriber recertification forms, and/or the data source the ETC reviewed to confirm the subscriber's eligibility in compliance with the documentation retention requirements per 47 C.F.R. Section 54.417(a).

The subscriber certification and/or recertification forms contained all the elements required per 47 C.F.R. Section 54.410.

The federal eligibility criteria listed on the forms was consistent with the federal eligibility criteria per 47 C.F.R. Section 54.409(a).

The subscribers who applied to receive Tribal Lifeline Program support certified to residing on Tribal lands in compliance with 47 C.F.R. Section 54.409(c).

The subscribers completed all required elements on the form.

The subscriber certification form was dated on or after the subscriber's Lifeline start date.

Moss Adams LLP did not examine the remaining 50 sampled items, as the error rate in the first 50 sampled items was zero, and below the 5% error rate threshold for expanded testing.

Moss Adams LLP reviewed the list of the data source or documentation reviewed by the ETC to confirm the subscriber's eligibility and verified the recorded data sources were eligible data sources per C.F.R. Section 54.410, such as (1) income or program eligibility databases, (2) income or program eligibility documentation, or (3) confirmation from a state administrator.

Moss Adams LLP noted the data source reviewed to confirm the subscriber's eligibility was an eligible data source per 47 C.F.R. Section 54.410.

No exceptions noted.

Objective IV: Annual Certifications and Recordkeeping by Eligible Telecommunications Carriers

Procedure 1

Moss Adams LLP inquired of management on February 19, 2015 and obtained the carrier's policies and procedures in response to Item 12 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for ensuring that the carrier has made and submitted the annual certifications required.

Moss Adams LLP examined the carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Lifeline rules set forth in 54.416 and 54.522 (Appendix F) of the Lifeline Biennial Audit Plan.

Moss Adams LLP noted no discrepancies between the carrier's policies and procedures, management's responses to the inquiries, and the Commission's Lifeline rules.

No exceptions noted.

Procedure 2

Moss Adams LLP examined the ETC's FCC Form 555 that was filed in January 2014 and verified an officer of the ETC certified that they understood the Commission's Lifeline rules and requirements and that the carrier: had policies and procedures in place to ensure that its Lifeline subscribers were eligible to receive Lifeline services; is in compliance with all federal Lifeline certification procedures; and in instances where the ETC confirmed consumer eligibility by relying on income or eligibility databases, as defined in 47 C.F.R. Section 54.410(b)(1)(i)(A) or (c)(1)(i)(A), the representative must attest annually as to what specific data sources the ETC used to confirm eligibility.

Moss Adams LLP noted no instances where certifications were not made.

No exceptions noted.

Procedure 3

Moss Adams LLP examined the ETC's organizational chart provided in response to Item 5 of Appendix A and verified the certifying officer on the FCC Form 555 was an officer per the organizational chart, or other publicly available document.

Moss Adams LLP noted the individual who certified the FCC Form 555 is an officer per the organizational chart.

No exceptions noted.

Procedure 4

Moss Adams LLP verified that the subscriber count per the FCC Form 555 agreed with the total subscriber count per the February Form 497 after all study areas were totaled.

Moss Adams LLP noted no discrepancies between the subscriber count per the FCC Form 555 and the total subscriber count per the February Form 497.

No exceptions noted.

Procedure 5

Moss Adams LLP randomly selected one of the three states or territories where the ETC received the largest amount of Lifeline support and two additional states or territories where the ETC is responsible for the annual recertification process.

Moss Adams LLP reviewed the ETC's recertification results of the individual subscribers reported on the FCC Form 555 filed in January 2014 for those three randomly selected states, as provided in Item 9 of Appendix A, and verified that the data reported on the FCC Form 555 for those states agreed with the detailed recertification results.

Moss Adams LLP noted no discrepancies between the FCC Form 555 for those states and the detailed recertification results.

No exceptions noted.

Procedure 6

Moss Adams LLP randomly selected three months during the audit period, one of the three states or territories where the ETC received the largest amount of Lifeline support, and two additional states or territories where the ETC receives Lifeline support.

Moss Adams LLP reviewed the ETC's detailed non-usage results of the individual subscribers reported on the FCC Form 555 for those three randomly selected months with the three selected states, as provided in Item 10 of Appendix A (Non-Usage Sample), and verified that the data reported on the FCC Form 555 for the Non-Usage Sample agrees with the detailed non-usage results.

Moss Adams LLP noted no discrepancies between the FCC Form 555 and the detailed non-usage results.

No exceptions noted.

Procedure 7

Moss Adams LLP reviewed the carrier's annual ETC certification, as provided in Item 13 of Appendix A, and verified that the ETC reported all the information and made all the certifications required by 47 C.F.R. Section 54.422(a)(b).

Moss Adams LLP noted no discrepancies between the information reported, certifications made, and those required by the Commission's Lifeline rules.

No exceptions noted.

Procedure 8

Moss Adams LLP reviewed the supporting schedules related to the carrier's annual ETC certification, as provided in Item 13 of Appendix A, and verified that the data reported on the annual ETC certifications agreed with supporting schedules.

Moss Adams LLP noted no discrepancies between the annual ETC certification and the supporting schedules.

No exceptions noted.

Procedure 9

Moss Adams LLP inquired of management on February 19, 2015 and obtained the carrier's policies and procedures for maintaining records that document compliance with the Lifeline program rules, as provided by the carrier in response to Item 4 of Appendix A.

Moss Adams LLP examined the carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the record keeping rules set forth in 47 C.F.R. Section 54.417.

Moss Adams LLP noted no discrepancies between the carrier's policies and procedures, management's responses to the inquiries, and the Commission's Lifeline rules.

No exceptions noted.

Moss Adams LLP noted the ETC provided the following communications to the subscribers:

Statement disclosed by field representatives at enrollment:

I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.

Texts messages sent to subscribers:

Reminder Texts sent throughout the year as soft notices:

"You must recertify your Life Wireless account by years end. Please call 611 for more information."

Hard Notice sent to start 30 day clock:

"NOTICE FROM LIFEWIRELESS: You must recertify eligibility for Lifeline Service within 30 days to continue receiving your lifeline discount. Please call 611."

Sent two weeks after hard notice:

"URGENT! LAST NOTICE. Your Life Wireless account is about to be disconnected. Dial 611 ASAP"

Sent 3 weeks after hard notice:

"You MUST VERIFY your Life Wireless account IMMEDIATELY. Your service is now scheduled for disconnection."

Sent 29 days after hard notice:

"FINAL NOTICE!!! Your Service will be scheduled for interruption tomorrow if you do not verify your account immediately!"

The following is an example of the recertification letter sent to subscribers:

Date



Telrite Corporation – LIFE Wireless

PO Box 2840
Covington, GA 30015
FAX: 1-866-770-6110
EMAIL: lwforms@lifewireless.com
Call today for more information: 1-888-543-3620

Federal law requires Life Wireless to ensure, each year, that all of its Lifeline customers remain eligible to continue to receive Lifeline service. **You must take action to continue to receive Lifeline service from Life Wireless.**

To ensure your Life Wireless service is not interrupted or terminated, you must complete the attached form and send it back to Life Wireless, and we must receive it no later than **30 days after the date of this letter**. If we do not receive the completed Recertification before 30 days have passed, your Life Wireless Lifeline service will be disconnected. Completed forms may be sent via email, US Mail or facsimile. See below for proper address information.

US Mail:
Telrite Corporation / Life Wireless
PO Box 2840
Covington, GA 30015

Email: lwforms@lifewireless.com

Fax: 1-866-770-6110

For additional information please call Customer Service at 1-888-543-3620 or by dialing 611 from your Life Wireless cell phone. On behalf of Telrite Corporation d/b/a Life Wireless, I want to thank you for choosing Life Wireless as your Lifeline service provider and look forward to receiving your completed recertification form **within 30 days of your receipt of this letter**.

Sincerely,

Brian Lisle
President - Telrite Corporation d/b/a Life Wireless



Annual Certification and Verification Form

Telrite Corporation – LIFE Wireless

PO Box 2840

Covington, GA 30015

FAX: 1-866-770-6110

EMAIL:

lwforms@lifewireless.com

Call today for more information: 1-888-543-3620

Each year as a participant in the lifeline program you are required by law to re-certify that you remain eligible to receive the Lifeline benefit. Re-certification will only take a few minutes but you must answer all of the below questions to retain service with Life Wireless and to continue receiving the Lifeline benefit.

Lifeline is a government assistance program and willfully making false statements to obtain a Lifeline benefit may result in fines, imprisonment, de-enrollment or being barred from the program. Lifeline benefits are limited to a single line of service 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 may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both and you cannot receive Lifeline benefits from multiple providers. Note that not all Lifeline services are currently marketed under the name Lifeline. Lifeline is a non-transferable benefit and you may not transfer your benefit to any other person, including another eligible low-income consumer. 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 potentially prosecution by the United States Government.

☐ I hereby certify that I have read and understood the disclosures listed above and that, to the best of my knowledge, my household is not already receiving a Lifeline service benefit.

I hereby authorize Life Wireless to access any records required to verify my statements and to confirm my eligibility for the Lifeline program. I also authorize Life Wireless to release any records required for the administration of the Lifeline program to the Universal Service Administrative Company (USAC), to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

Check One: ☐ I understand the above and agree ☐ I do not agree

Customer Validation and Eligibility: The information you enter below must match the detail Life Wireless has on file as accumulated at time of enrollment into the Lifeline program.

First Name: _____ Middle Initial: _____ Last Name: _____

Print the last four digits of your Social Security Number:

Agreed-Upon Procedures Report – Attachment B
Telrite Corporation

Date of Birth (DOB): _____ Life Wireless Cell Phone # _____

I certify that I participate in at least one of the below programs: Check One:

- | | |
|---|---|
| ☐ Supplemental Nutrition Assistance Program (SNAP) | ☐ Income at or below 135% of Federal Poverty Guidelines |
| ☐ Section 8 Federal Public Housing Assistance (FPHA) | ☐ Food Distribution Program on Indian Reservations (FDPIR) |
| ☐ Medicaid (not Medicare) | ☐ Bureau of Indian Affairs General Assistance (BIA) |
| ☐ Supplemental Security Income (SSI) | ☐ Tribally Administered TANF (TATNF) |
| ☐ Temporary Assistance for Needy Families (TANF) | ☐ Head Start (meeting income qualifying standards) |
| ☐ Low Income Home Energy Assistance Program (LIHEAP) | ☐ State Specific Program: _____ |
| ☐ National School Lunch Program's free lunch program | Print the name of the program |

2) I will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based eligibility criteria, I begin receiving more than one Lifeline benefit, or another member of my household is receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.

Check One ☐ I understand the above and agree ☐ I do not agree

3) I am not listed as a dependent on another person's tax return (unless over the age of 60).

Check One ☐ Correct ☐ Not Correct

4) The address listed on my original application is my primary residence, not a second home or business.

Check One ☐ Correct ☐ Not Correct

5) If I move to a new address, I will provide my new address to Life Wireless within 30 days.

Check One ☐ Correct ☐ Not Correct

6) If I provided a temporary residential address to Life Wireless, I will verify my temporary residential address every 90 days.

Check One ☐ I understand the above and agree ☐ I do not agree

7) I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

Check One ☐ I understand the above and agree ☐ I do not agree

8) I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify as to my continued eligibility within 30 days will result in de-enrollment and the termination of my Lifeline benefits.

Check One ☐ I understand the above and agree ☐ I do not agree

9) The information contained in this certification form is true and correct to the best of my knowledge.

Check One ☐ I understand the above and agree ☐ I do not agree

Signature: _____ Date: _____

The following is an example of the notice sent to subscribers:

**ATTENTION LIFE WIRELESS
CUSTOMERS:
DON'T LOSE YOUR FREE SERVICE!**

In order to continue using the FREE Lifeline Service through your Life Wireless account, you must recertify that you still receive a government subsidy which qualifies you for the Lifeline Service.

Dial 611
from your Life Wireless phone, or
888-543-3620
from a landline!

Final notice!

Life
Wireless

FINAL NOTICE!

Dear Life Wireless Customer:

We have repeatedly attempted to contact you regarding your Lifeline supported service. If you fail to act upon this final notification on or before **December 31, 2013**, your Life Wireless, Lifeline supported wireless service will be **disconnected**.

To retain your Lifeline supported service through Life Wireless you **MUST** contact Customer Service by dialing **611** from your life wireless handset OR 1-888-543-3620 from any landline phone and complete the automated re-certification process by selecting **option 7** of the menu prompts.

If you feel you have received this notification in error and have previously completed the annual re-certification process please contact Life Wireless customer service to verify your annual re-certification was properly recorded. We at Life Wireless welcome your continued patronage but by failing to annually re-certify your continued eligibility for the Lifeline credit by **December 31, 2013**, we have no choice but to disconnect your service per FCC regulation.

Life Wireless
14250 Lechnette Blvd., Ste K
Covington, GA 30014

