



Associated Legal Group, LLC

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February 4, 2016

Utah Public Service Commission  
Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84111

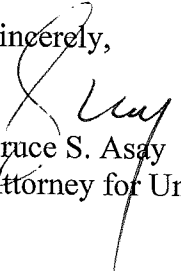
Re: Union Wireless - Form 555 Compliance Filing  
Docket 16-999-04

To Whom it May Concern:

Attached is the Compliance Filing for the FCC Form 555 for Union Telephone Company, d/b/a Union Wireless. Please acknowledge receipt of filing by reply.

If there are any questions, please contact me at (307) 632-2888.

Sincerely,

  
Bruce S. Asay  
Attorney for Union Telephone Company

ENC.

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**  
All carriers must complete all or portions of all sections  
Form must be submitted to USAC and filed with the Federal Communications Commission  
**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**  
*Deadline: January 31<sup>st</sup> (Annually)*

|   |   |
|---|---|
| 519005  |   |
| Study Area Code (SAC)<br><i>(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).</i> |   |
| Utah  | Union Telephone Co  |
| State   | ETC Name  |
| Union Wireless  |   |
| DBA, Marketing or Other Branding Name<br><i>(If same as ETC name, list "N/A" Do not leave blank)</i>  | Holding Company Name<br><i>(If same as ETC name, list "N/A" Do not leave blank)</i> |

Does the reporting company have affiliated ETCs?      Yes       No

*Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.*

| Affiliated ETC's SAC | Affiliated ETC's Name |
|----------------------|-----------------------|
|                      |                       |

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial   CF

**Section 2: Annual Recertification**

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

| A  | B   | C  | D  | E = (A - B - C - D)  |
|--|---|--|--|--|
| Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year<br><i>(February data month)</i> | Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers | Number of subscribers claimed on the February FCC Form 497 that were initially enrolled in the current Form 555 calendar year<br><i>(These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)</i> | Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC | Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year |
| 1  | 0   | 0  | 0  | 1  |

**Recertification Results:**

| F   | G   | H = (F-G)                            | I   | J = (H+I)  |
|---|---|--------------------------------------|---|--|
| Number of subscribers ETC contacted directly to recertify eligibility through attestation | Number of subscribers responding to ETC contact | Number of non-responding subscribers | Number of subscribers responding that they are no longer eligible<br><i>(This should be a subset of Block G.)</i> | Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt |
| 1   | 1   | 0                                    | 0   | 0  |

| K   | L  |
|---|--|
| Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC | Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC |
|   |  |

*Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.*

*The total of Block F and Block K should equal the number reported in Block E.*

**Certification:**

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial CF

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: (List database or name of administrator her ). Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial CF

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial \_\_\_\_\_

**Section 3: De-enroll Percentage**

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

| <b>M = (F+K)</b>   | <b>N = (J+L)</b>  | <b>O = ((N ÷ M) * 100)</b>  |
|--|---|---|
| Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC<br><i>(This should equal the number reported in Block E)</i> | Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility | Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response |
| 1  | 1   | 100   |

**Section 4: Pre-Paid ETCs**

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

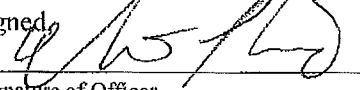
Is the ETC Pre-Paid?      Yes       No

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

| <b>P</b>          | <b>Q</b>                              |
|-------------------|---------------------------------------|
| Month             | Subscribers De-Enrolled for Non-Usage |
| January           |                                       |
| February          |                                       |
| March             |                                       |
| April             |                                       |
| May               |                                       |
| June              |                                       |
| July              |                                       |
| August            |                                       |
| September         |                                       |
| October           |                                       |
| November          |                                       |
| December          |                                       |
| Total Subscribers |                                       |

**Signature Block**

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed   
 Signature of Officer  
 creno@unionwireless.com  
 Email Address of Officer  
 DeEtte Wall  
 Person Completing This Certification Form

Chris Reno Director of Accounting  
 Printed Name and Title of Officer  
 1/26/2016  
 Date  
 307-782-4160  
 Contact Phone Number

