

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of US CONNECT LLC)	
)	
for Designation as an Eligible Telecommunications)	Docket No. 11-2544-01
Carrier in the State of Utah)	
)	
)	

**US CONNECT LLC'S SUBMISSION OF
DIRECT TESTIMONY AND EXHIBITS**

US CONNECT LLC, by counsel, files its Direct Testimony and Exhibits with the Public Service Commission of Utah in the above-referenced docket. US Connect's Direct Testimony and Exhibits include the testimony of Bassam Abdallah and Exhibits 1-2, inclusive, identified therein.

Respectfully submitted this 12th day of January, 2012.

 /s/
 Lance J.M. Steinhart
 Lance J.M. Steinhart, P.C.
 1725 Windward Concourse, Suite 150
 Alpharetta, Georgia 30005
 (770) 232-9200 (Phone)
 (770) 232-9208 (Fax)
 E-Mail: lsteinhart@telecomcounsel.com

Attorney for US CONNECT LLC

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DIRECT TESTIMONY OF BASSAM ABDALLAH

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

2 **A:** My name is Bassam Abdallah. I am the Director of Operations of US CONNECT
3 LLC (hereinafter sometimes referred to as “US Connect” or the “Company”).
4 Prior to my involvement with US Connect, I supervised the development of
5 software applications, system integrations and product implementation at Global
6 Connections, a leading CLEC offering telephone services to low-income
7 consumers. I have over 10 years of management expertise, with a strong
8 background in business operations.

9 **Q2: WHAT IS US CONNECT LLC?**

10 **A:** US Connect is a Georgia limited liability company organized on January 7, 2011.
11 The Company’s principal office is located at 705 Commerce Street, Southlake,
12 Texas 76092. US Connect is a reseller of commercial mobile radio service
13 (“CMRS”) throughout the United States and provides prepaid wireless
14 telecommunications services by using the Sprint Nextel (“Sprint”) network.

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

2 **A:** The Company provides prepaid wireless services. In addition to voice services,
3 US Connect offers text and multimedia messaging. US Connect's prepaid
4 wireless services are affordable, easy to use, and attractive to lower-income and
5 lower-volume consumers, providing them with access to emergency services and
6 a reliable means of communication that can be used both at home and while
7 traveling to remain in touch with friends and family and for contacting
8 prospective employers.

9 **Q4: HOW ARE US CONNECT'S WIRELESS SERVICES DIFFERENT FROM**
10 **OTHER CARRIERS' OFFERINGS?**

11 **A:** Unlike many carriers, US Connect does not impose burdensome credit checks,
12 long-term service contracts, activation fees or roaming charges. US Connect
13 customers are from lower-income backgrounds and will not previously have had
14 access to high quality wireless services because of financial constraints or poor
15 credit history. Also unlike many carriers, US Connect does not charge for
16 balance inquiries, calls to 911 emergency services or calls to US Connect
17 customer service. US Connect customers enjoy the benefit of unused minutes
18 carrying over from one month to the next. US Connect will offer Lifeline
19 customers a certain amount of service free of charge. US Connect customers can
20 use their minutes to place calls statewide (or even nationwide) because US
21 Connect does not constrict customers' use by imposing a local calling area
22 requirement. In addition to free voice services, US Connect will provide Lifeline
23 customers with access to a variety of other features at no cost, including voice

1 mail, caller I.D., call waiting, call forwarding, and 3-way calling.

2 **Q5: DOES US CONNECT CURRENTLY PROVIDE**
3 **TELECOMMUNICATIONS SERVICE IN UTAH?**

4 **A:** No; however US Connect was acknowledged as a CMRS provider in the State of
5 Utah on November 2, 2011. Through its agreement with its underlying carrier,
6 Sprint, US Connect is able to offer services wherever Sprint offers services in
7 Utah.

8 **Q6: WILL US CONNECT CONTRIBUTE TO THE UTAH ENHANCED 911**
9 **FUND?**

10 **A:** Yes. US Connect will remit E-911 fees in Utah.

11 **Q7: WILL US CONNECT CONTRIBUTE TO THE FUNDING FOR**
12 **UNIVERSAL SERVICE?**

13 **A:** Yes. US Connect will contribute to the funding of both the federal and state
14 universal service funds (“USF”).

15 **Q8: WHAT IS THE NATURE OF US CONNECT’S ETC DESIGNATION**
16 **REQUEST?**

17 **A:** US Connect requests Eligible Telecommunications Carrier (“ETC”) designation
18 in Utah solely to provide Lifeline and Link-Up service to qualifying Utah
19 consumers; it will not seek access to funds from the federal USF high cost
20 program.

21 **Q9: IN WHAT SERVICE AREAS IS US CONNECT SEEKING**
22 **DESIGNATION AS AN ETC?**

23 **A:** US Connect requests ETC designation in the wire centers in which US Connect

1 has network coverage. These wire centers were included as Exhibit 6 of the
2 Company's Petition.

3 **Q10: DOES US CONNECT SATISFY THE REQUIREMENTS FOR ETC**
4 **DESIGNATION IN UTAH?**

5 **A:** Yes. US Connect satisfies all of the requirements for ETC designation contained
6 in both federal and Utah state regulations. US Connect recognizes that Section
7 214(e)(1)(A) of the Communications Act of 1934, as amended (the "Act"), states
8 that ETCs shall offer services, at least in part, over their own facilities and that the
9 Federal Communications Commission's (FCC) Rules (47 C.F.R. § 54.201(i))
10 prohibit state commissions from designating as an ETC a telecommunications
11 carrier that offers services exclusively through the resale of another carrier's
12 services. US Connect offers services through a combination of its own facilities
13 and resale.

14 **Q11: HAS US CONNECT BEEN DESIGNATED AS AN ETC IN ANY OTHER**
15 **STATES?**

16 **A:** Yes. US Connect has been designated as an ETC in the following states:
17 Arkansas on October 27, 2011; Maryland on July 8, 2011; West Virginia on
18 September 27, 2011. US Connect currently has applications for ETC designation
19 pending in the following states: Colorado, Georgia, Illinois, Kansas, Louisiana,
20 Minnesota, Oklahoma, Pennsylvania, and Washington. US Connect has not been
21 denied ETC status by any regulatory authority.

22

23

1 **Q12: WHAT FUNCTIONS WILL US CONNECT OFFER TO SUBSCRIBERS**
2 **ONCE GRANTED ETC STATUS?**

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

5 a. *Voice-grade access to the public switched telephone network.* The
6 FCC has concluded that voice grade service means the ability to make and
7 receive phone calls, within a specified bandwidth and frequency range.
8 US Connect meets this requirement by providing voice-grade access to
9 the public switched telephone network. Through its interconnection
10 agreements, all customers of US Connect are able to make and receive
11 calls on the public switched telephone network within the specified
12 bandwidth.

13 b. *Local usage.* ETCs must include local usage beyond providing
14 simple access to the public switched network as a part of a universal
15 service offering. US Connect includes specified quantities of usage in its
16 rate plans and thereby complies with the requirement. It is important to
17 note that currently, the FCC has not adopted any minimum local usage
18 requirements. FCC rules further require an ETC applicant to show it has
19 a local usage plan comparable, although not identical, to that offered by
20 the ILEC in the same service area.

21 c. *Access to emergency services.* The ability to reach a public
22 emergency service provider by dialing 911 is a requirement in any
23 universal service offering. US Connect currently provides 911 and E911

1 access for all of its customers, and will continue to comply with all FCC
2 E911 requirements applicable to wireless resellers. Furthermore, through
3 its underlying carrier(s), US Connect has the ability to remain functional
4 in emergency situations.

5 d. *Toll limitation for qualifying low-income consumers.* Toll
6 limitation allows customers to block the completion of outgoing long
7 distance calls to prevent them from incurring significant long distance
8 charges and risking disconnection. The nature of US Connect's service
9 mitigates the need for toll control. US Connect's service is not offered on
10 a distance-sensitive basis and minutes are not charged separately for local
11 or domestic long distance services. Since US Connect's service is a
12 prepaid service, no customers will be disconnected for failure to pay toll
13 charges.

14 **Q13: HOW QUICKLY CAN US CONNECT COMMENCE SERVICE?**

15 **A:** Upon designation as an ETC, US Connect will be able to provide Lifeline service
16 to qualified customers within a reasonable period of time. US Connect's
17 provider's network is operational and largely built out. Thus, US Connect will be
18 able to commence offering its service to all locations served by its underlying
19 carrier very soon after receiving approval from the Commission. The only delay
20 will be the time needed to implement procedures and internal systems.

21 **Q14: HOW RELIABLE IS US CONNECT'S QUALITY OF SERVICE?**

22 **A:** US Connect's service is of the same quality and reliability as that of its underlying
23 carrier. To demonstrate its commitment to high service quality, US Connect

1 commits to comply with the Cellular Telecommunications and Internet
2 Association's (CTIA) Consumer Code for Wireless Service. A copy of the CTIA
3 Code is attached as Exhibit 1.

4 **Q15: HOW DOES US CONNECT INTEND TO ADVERTISE THE**
5 **AVAILABILITY OF THE SUPPORTED SERVICES?**

6 **A:** US Connect will broadly advertise the availability and rates for the services
7 described above using media of general distribution as required by Section
8 54.201(d)(2) of the FCC's regulations. The Company will advertise its services in
9 a manner reasonably designed to reach those likely to qualify for Lifeline and
10 Link-up services, using many mediums for outreach including internet, direct
11 response radio and community events. The Company will engage in advertising
12 campaigns promoting the availability of cost-effective wireless services to this
13 neglected consumer segment. US Connect will provide retail vendors with
14 signage to be displayed wherever US Connect products are sold, and with printed
15 materials describing the Company's Lifeline and Link-Up programs. US Connect
16 will promote the availability of its Lifeline and Link-up offerings by distributing
17 brochures at various state and local social service agencies, and intends to partner
18 with nonprofit assistance organizations in order to inform customers of the
19 availability of its Lifeline and Link-Up services.

20 **Q16: WILL US CONNECT COMPLY WITH THE LIFELINE**
21 **CERTIFICATION AND VERIFICATION REQUIREMENTS?**

22 **A:** Yes. US Connect will comply with the FCCs certification and verification
23 requirements, and with Commission determined methods or processes to establish

1 initial eligibility, to complete annual recertification and to determine that
2 customers do not take service from multiple lifeline providers.

3 **Q17: HOW WILL US CONNECT CERTIFY THAT A CUSTOMER IS**
4 **ELIGIBLE FOR THE FEDERAL LIFELINE DISCOUNT?**

5 **A:** During the enrollment process, applicants will be directed to a toll-free telephone
6 number and to US Connect's website, which will contain information regarding the
7 Company's Lifeline and Link-Up services, including a detailed description of the
8 programs and state-specific eligibility criteria. Customers may then request that an
9 enrollment form be mailed to them, or they can download a form from the
10 internet. Applicants must complete the enrollment form, which will include a
11 place where applicants must attest and certify under penalty of perjury that they
12 satisfy the requisite eligibility criteria. In addition, each applicant is required to
13 certify under penalty of perjury, at the time of application and annually thereafter,
14 that they are head of their household and receive Lifeline-supported service only
15 from US Connect. If not applying in person, the applicant must return the signed
16 enrollment form and all supporting documentation to the address provided by US
17 Connect. Processing of consumers' applications, including review of all application
18 forms and relevant documentation, will be performed under the Company's
19 supervision by managers experienced in the administration of the Lifeline and Link-
20 Up programs. US Connect maintains records of its compliance with federal
21 certification rules in accordance with the FCC's rules regarding record retention.

22

23

1 **Q18: HOW WILL US CONNECT VERIFY A CUSTOMER'S CONTINUED**
2 **ELIGIBILITY FOR THE FEDERAL LIFELINE DISCOUNT?**

3 **A:** Customers must self-certify, under penalty of perjury, at the time of service
4 activation and annually thereafter, that they remain head of household and receive
5 Lifeline-supported service only from US Connect. Furthermore, customers
6 chosen to participate in the additional random survey of continued eligibility will
7 be required to attest and certify under penalty of perjury that they continue to
8 satisfy the requisite program or income based eligibility criteria. US Connect will
9 require and obtain all such certifications as a condition for continued Lifeline
10 support, and will maintain certification records for auditing purposes.

11 **Q19: DOES US CONNECT USE A THIRD PARTY ADMINISTRATOR TO**
12 **ASSIST WITH ITS LIFELINE SERVICES?**

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

23

1 **Q20: WHAT MEASURES DOES US CONNECT PLAN TO TAKE TO**
2 **PREVENT RECOVERY OF THE FEDERAL LIFELINE DISCOUNT FOR**
3 **CUSTOMERS ALREADY RECEIVING THE DISCOUNT FOR THEIR**
4 **LANDLINE TELEPHONE?**

5 **A:** US Connect application forms will require each applicant to provide their name,
6 primary residential address and an alternate telephone number (if any). US Connect
7 will incorporate this information into its customer information database. As
8 previously mentioned, the Company will check the name and address of each
9 Lifeline applicant against its database to determine whether or not it is associated
10 with a customer that already receives US Connect Lifeline service, and will then
11 review the application to ascertain whether the applicant is attempting to receive
12 Lifeline-supported service for more than one handset associated with the address.
13 US Connect will deny the Lifeline application of any such individual and advise the
14 applicant of the basis for the denial. As mentioned above, applicants must self-
15 certify, under penalty of perjury, at the time of service activation and annually
16 thereafter, that they remain head of household and receive Lifeline-supported
17 service only from US Connect. In addition, US Connect will utilize the
18 Department of Community and Culture's knowledge and databases (or the
19 provider of verification services established through Docket No. 10-2508-01) to
20 ensure as accurately as possible that only one individual per household is
21 receiving the subsidy, and that applicants are not already receiving Lifeline
22 support from any other carrier.

23

1

2 **Q21: WHAT MEASURES DOES US CONNECT PLAN TO TAKE TO**
3 **PREVENT RECOVERY OF LIFELINE FUNDS FOR PREPAID**
4 **CUSTOMERS WHO CEASE USING US CONNECT PHONES AND**
5 **AIRTIME?**

6 **A:** US Connect will adhere to its non-usage policy. US Connect recognizes the
7 importance of safeguarding the USF. Therefore, the Company has implemented
8 the following 60-day non-usage policy in an effort to avoid waste, fraud, and
9 abuse of the program. If no usage appears on a US Connect Lifeline customer's
10 account during any continuous 60-day period, the Company will promptly notify
11 the customer that the customer is no longer eligible for US Connect Lifeline
12 service subject to a 30-day grace period. During the 30-day grace period, the
13 customer's account will remain active, but US Connect will engage in outreach
14 efforts to determine whether the customer desires to remain on the Company's
15 Lifeline service. If the customer's account does not show any customer-specific
16 activity during the grace period, US Connect will promptly deactivate Lifeline
17 services and cease to seek reimbursement from the USF for that customer.
18 Customers that have been deactivated may participate in the Company's Lifeline
19 service in the future by reapplying and re-establishing eligibility.

20 **Q22: WHAT ARE THE RATES AND TERMS OF US CONNECT'S LIFELINE**
21 **SERVICE OFFERING?**

22 **A:** Attached Exhibit 2 demonstrates that eligible customers will receive 100 anytime
23 prepaid minutes per month at no charge, with additional airtime minutes available

1 for purchase in bundles. The Company's Lifeline service will provide customers
2 with 100 anytime prepaid minutes per month at no charge. Lifeline customers
3 will have the capability of purchasing additional bundles of minutes in
4 denominations as low as \$5, \$10, and \$20.¹ Airtime replenishment cards will be
5 made available at retail outlets frequented by low income customers throughout
6 the Company's Service Area. Text messaging will be available at the rate of one-
7 third of one minute (3 texts = 1 minute). In addition to free voice services, US
8 Connect's Lifeline plan will include a free handset and the following Custom
9 Calling features: Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and
10 Voicemail. Customers may use their minutes to place domestic long distance
11 calls at no additional charge. Calls to US Connect customer service will be free,
12 and unused minutes will rollover. Calls to 911 emergency services are always
13 free, regardless of service activation or availability of minutes. Customers may
14 use their minutes to place domestic long distance calls at no additional charge.
15 Unlike many carriers, US Connect customers enjoy minutes that carry over from
16 one month to the next. Moreover, by providing a wireless handset free of charge,
17 US Connect guarantees that eligible customers can access the Company's Lifeline
18 services without incurring any upfront or recurring costs.

19 Consistent with FCC requirements, US Connect will use Link-Up support to
20 reduce the Company's \$60.00 standard wireless activation charge by \$30.00.
21 Qualifying subscribers may request a deferred payment schedule for the
22 remaining installation charges, thus allowing subscribers to obtain service without

¹ \$5 = 35 minutes, \$10 = 75 minutes, \$20 = 160 minutes, \$30 = 270 minutes, and \$50 = 700 minutes

1 being required to pay any fees to activate service with US Connect. As such,
2 there is no up-front connection charge applicable to US Connect Lifeline and
3 Link-Up customers.

4 **Q23: HAVE THERE BEEN ANY CHANGES TO THE OFFERING SINCE US**
5 **CONNECT SUBMITTED ITS PETITION?**

6 **A:** No.

7 **Q24: DOES US CONNECT INTEND TO PROVIDE QUALIFIED LIFELINE**
8 **CUSTOMERS WITH A FREE HANDSET?**

9 **A:** Yes, US Connect will provide qualified Lifeline customers with a free handset.
10 US Connect's phones have been through extensive testing in Sprint's handset lab
11 to ensure proper network performance, 911 reliability, and to make sure the
12 handset does not cause network interference.

13 **Q25: HOW WILL CUSTOMERS KNOW IN ADVANCE THE NUMBER OF**
14 **FREE MINUTES THEY WILL HAVE AND WHEN MORE WILL BE**
15 **ADDED?**

16 **A:** Lifeline customers will have detailed materials in the box with their phone that
17 describe the number of minutes/credit they receive and when the minutes/credit
18 will be replenished. US Connect customers can check the balance of their
19 minutes either online or by calling customer service.

20 **Q26: WHAT HAPPENS TO THE CUSTOMER'S PHONE SERVICE AFTER**
21 **THE FREE MINUTES HAVE BEEN UTILIZED?**

22 **A:** Once the 100 minutes (plus any carry over minutes) have been utilized, customers
23 will either have to wait until the next month for a new allotment of minutes of

1 free air time or they can purchase additional minutes.

2 **Q27: HOW WILL CUSTOMERS COMMUNICATE WITH US CONNECT**
3 **REGARDING QUESTIONS, CONCERNS OR COMPLAINTS?**

4 **A:** US Connect’s Lifeline customers will have access to US Connect’s customer care
5 (the same customer care as regular retail customers) by calling 611 from their US
6 Connect Lifeline phone or the company’s toll-free number. Customers can also
7 contact customer care on the US Connect website. US Connect is committed to
8 resolving customer questions, concerns and complaints in a swift and satisfactory
9 manner.

10 **Q28: HOW WILL US CONNECT’S PRESENCE AS AN ETC IN UTAH SERVE**
11 **THE PUBLIC INTEREST?**

12 **A:** A central purpose of the Telecommunications Act of 1996 was to “promote
13 competition and reduce regulation ... to secure lower prices and higher quality
14 services ... and encourage the rapid deployment of new telecommunications
15 technologies” to all citizens, regardless of geographic location or income.²
16 Designation of US Connect as an ETC would undoubtedly further these goals.
17 US Connect’s Lifeline service will provide low-income Utah residents with the
18 convenience and security offered by wireless services—even if their financial
19 position deteriorates.

20 US Connect’s Lifeline plan will not only allow feature-rich mobile connectivity
21 for qualifying subscribers, but will also bring competition and more variety of
22 options into the reach of Lifeline customers. US Connect’s plan is comparable in

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

1 minutes and features to those available to Utah post-paid wireless subscribers –
2 just at low Lifeline rates and without the burden of credit checks, contracts,
3 activation fees or roaming charges.

4 Without question, prepaid wireless services have become essential for lower-
5 income customers, providing them with value for their money, access to
6 emergency services on wireless devices, and a reliable means of contact for
7 prospective employers, social service agencies or dependents. Providing US
8 Connect with the authority necessary to offer discounted Lifeline services to those
9 most in danger of losing wireless service altogether undoubtedly promotes the
10 public interest.

11 **Q29: WHAT ARE SOME OF THE BENEFITS OF INCREASED**
12 **COMPETITIVE CHOICE?**

13 **A:** Introducing US Connect as an additional ETC provider into the market will afford
14 low income Utah residents a wider choice of providers and available services
15 while creating a competitive marketplace as ETCs compete for a finite number of
16 Lifeline-eligible customers. Increasing the competitive marketplace of providers
17 has the potential to effectively increase the penetration rate and reduce the number
18 of individuals not connected to the PSTN. As of December 31, 2009, only
19 between 20-50% of Lifeline-eligible consumers in Utah were being provided such
20 services.³ US Connect believes that it is uniquely positioned to help increase
21 awareness of and participation in the Lifeline program.

22

³ see <http://www.usac.org/li/about/participation-rate-information.aspx#2009>

1 **Q30: IF US CONNECT’S PETITION IS GRANTED, WILL THERE BE ANY**
2 **IMPACT ON THE UNIVERSAL SERVICE FUND?**

3 **A:** US Connect’s request for designation as an ETC would not unduly burden the
4 USF or otherwise reduce the amount of funding available to other ETCs. US
5 Connect seeks ETC designation solely to utilize USF funding to provide Lifeline
6 and Link-Up service to qualified low-income consumers. It does not seek and
7 will not accept high cost support. With Lifeline, ETCs only receive support for
8 customers they obtain. The amount of support available to an eligible subscriber
9 is exactly the same whether the support is given through a company such as US
10 Connect or the Incumbent LEC operating in the same service area. US Connect
11 will only increase the amount of USF Lifeline funding in situations where it
12 obtains Lifeline customers not enrolled in another ETC’s Lifeline program.
13 Significantly, US Connect’s designation as an ETC will not increase the number
14 of persons eligible for Lifeline support. As stated in the Act, the universal service
15 fund was established to ensure that quality services are available to all individuals
16 at just, reasonable and affordable rates. US Connect’s ability to increase the
17 participation rate of qualified low-income individuals will further the goal of
18 Congress to provide all individuals with affordable access to telecommunications
19 service.

20 **Q31: DOES US CONNECT AGREE TO COMPLY WITH ALL COMMISSION**
21 **RULES AND REGULATIONS REGARDING ETC?**

22 **A:** Yes. US Connect hereby asserts its willingness and ability to comply with all the
23 rules and regulations that the Commission may lawfully impose upon the

1 Company's provision of service contemplated by its petition for ETC designation.

2 **Q32: IS THERE ANYTHING ELSE YOU WOULD LIKE TO ADD TO YOUR**
3 **TESTIMONY?**

4 **A:** I would like to reiterate that US Connect meets all legal requirements for
5 designation as an ETC. Accordingly, the Commission should promptly grant US
6 Connect's petition ETC designation so that US Connect may commence providing
7 service to qualified low-income Utah households at the earliest possible time.

Exhibit 1

CTIA Code

Exhibit 2

US CONNECT LLC's Lifeline and Link-Up Rates

Lifeline 100 Minutes Plan - \$0

100 anytime minutes per month

- Free handset
- Free Voicemail, Caller-ID, Call waiting, Call Forwarding, 3-Way Calling
- Free calls to Customer Service
- Free calls to 911 emergency services
- Unused minutes rollover
- 3 text messages = 1 minute of usage

Additional bundles of minutes available:

\$5 = 35 minutes

\$10 = 75 minutes

\$20 = 160 minutes

\$30 = 270 minutes

\$50 = 700 minutes

Link-up Rates

Standard Activation Rate \$60.00

Link-up Discount \$30.00

Net cost to Link-up Customer: **\$0.00***

*Qualifying subscribers may request to have the reduced activation charge deferred for a twelve (12) month period with no interest, and subscribers remaining with US Connect's service for a period of 12 full months from the date of activation will receive a reduction of the remaining activation charge balance to zero, thus allowing subscribers to obtain service without being required to pay any fees to activate service.

State of _____

County of _____

AFFIDAVIT

I, Bassam Abdallah, first being duly sworn upon oath depose and say that I am the Director of Operations of US CONNECT LLC, the Applicant, and that I have read the above and foregoing direct testimony by me subscribed and know the contents thereof, which testimony was filed in support of US CONNECT LLC's Petition for Designation as an Eligible Telecommunications Carrier in the State of Utah; that said contents are true in substance and in fact, except as to matters stated upon information and belief, and as to those, I believe the same to be true.

Bassam Abdallah
Director of Operations
US CONNECT LLC

Sworn to and subscribed before me

this ____ day of January, 2012.

Notary Public

My Commission Expires: