

In the matter of the Petition of Vaix, Inc. dba  
Senawave Communications for Designation as  
an Eligible Telecommunications Carrier for the  
purpose of Offering Lifeline Broadband Service  
in the State of Utah.

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DIRECT TESTIMONY OF LORNE JENSEN  
ON BEHALF OF VAIX, INC. dba Senawave  
Communications

**1 Q PLEASE STATE YOUR NAME, ADDRESS AND POSITION**

**2 A** My name is Lorne Jensen. My business address is 2607 S Decker Lake Blvd Ste 100 West Valley City, Ut  
**3** 84119. I am the designated representative in charge of marketing broadband services to businesses and  
**4** overseeing activities to include and obtain designation as a Lifeline Broadband Provider for the State of  
**5** Utah. I have been directed by Senawave's COO, David Bradshaw to oversee this process.

**6 Q HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE UTAH PUBLIC SERVICE COMMISSION?**

**7 A** No I have never testified before the Utah Public Service Commission. To date I have appeared only as a  
**8** matter of establishing a scheduling conference which was done August 23, 2017.

**9 Q ARE YOU SPONSORING THE PETITION IN THIS PROCEEDING?**

**10 A** I am performing the necessary due diligence, filing the appropriate petitions and documents under the  
**11** guidance of the Senawave COO, David Bradshaw in compliance with all stated FCC guidelines and  
**12** regulations. I have been in direct contact with Counsel for Wireline Competition in Washington, DC  
**13** seeking guidance and qualification standards to participate in the Lifeline broadband program prior to  
**14** filing the form 498 and subsequently, now the petition for ETC status with the State of Utah.

**15 Q WHAT IS VAIX, INC dba SENAWAVE COMMUNICATIONS REQUESTING IN ITS PETITION?**

**16 A** Vaix Inc, dba Senawave Communications requests designation by the Utah Public Service Commission  
**17** as an "ETC" Eligible Telecommunications Carrier for the limited purpose of providing "LBP" Lifeline  
**18** Broadband Service "ONLY". We are not seeking lifeline voice or cellular participation in our petition nor  
**19** universal high cost support on infrastructure projects. Our only purpose is to participate in Broadband  
**20** Internet service for low income qualifying Utah participants.

21 Q **WHAT IS SENA WAVES PROPOSED SERVICE AREA IN UTAH?**

22 A Within our current infrastructure network for providing Broadband Internet Access Services (BIAS)  
23 delivered by Wireless, Fiber, DSL, etc, our primary area of service is in Northern Utah counties with  
24 expansion of infrastructure always on the horizon.

25 Q **IS SENA WAVE SEEKING FUNDING FROM THE UTAH STATE UNIVERSAL SERVICE FUND?**

26 A Senawave is not seeking any USF funding. If that changes in the future, separate application will be  
27 made for that purpose.

28 Q **WHAT ARE THE FCC REQUIREMENTS FOR LIFELINE BROADBAND PARTICIPATION?**

29 A Requirements outlined by the FCC state. 1. Broadband providers serve at least 1000 non-lifeline  
30 customers with voice and/or BIAS. 2. Has offered broadband internet service to the public for the 2  
31 years preceding the petition without interruption, which then qualifies the carrier for streamlined  
32 treatment. Streamline designation process will be deemed granted 60 days after the petition unless  
33 the Bureau notifies the applicant that the grant will not be automatically effective. Broadband speeds  
34 shall not be less than 10/1 Mbps speeds with not less than 150 GB data transmission.

35 Q **DOES VAIX, INC. dba SENA WAVE COMMUNICATIONS MEET FCC REQUIREMENTS?**

36 A Yes, Vaix was established May 2011 (see copy of license original petition) and Senawave was registered  
37 with the State of Utah in 2012 (license in original petition). The client base, per guidelines exceeds 1000  
38 and the licensing speaks for itself for length of time in business. Direct consultation with Counsel for  
39 Wireline Competition, indicates Streamline designation will be applied and their feelings were that State  
40 of Utah should offer comparable streamline approval process for ETC designation to complete the 498  
40 application process with the FCC.

41 Q **IS SENA WAVE A COMMON CARRIER (PROVIDER) OR RESELLER OF SERVICES?**

42 A Senawave is an actual provider of service providing owned infrastructure and service from its own  
43 transmission facilities. Again, Counsel from Wireline Competition shared their view that this  
44 uncomplicates the approval process and further accentuates the ability to streamline the entire

45 approval and implementation process to grant necessary FCC license. All requirements have been met  
46 for the 498 application and is in need of only the State ETC designation at this point.

**47Q DOES SENAWAVE HAVE TO FILE A COMPLIANCE PLAN?**

48 A In direct communications with Wireline Competition querying the need for a compliance plan, it was  
49 revealed, from Counsel, that a compliance plan is not necessary because of the fact that Senawave  
50 is a provider and not a reseller of other providers services. This also contributes to the streamlining  
51 process moving the application expeditiously.

**52Q WILL SENAWAVE COMPLY WITH ALL FEDERAL GUIDELINES OF QUALIFYING LIFELINE PARTICIPANTS?**

53 A Yes, all guidelines pertaining to household qualification, individual, income determination residency and  
54 advertising/promotion as outlined under FCC guidelines will be strictly adhered to, enforced and taught  
55 to all relevant staff interfacing with public demand for the program. Direct promotion and contact will  
56 be made with subsidized housing accommodations and high density complexes in need of assisting low  
57 income individuals/families with proper designation of this government sponsored program with  
58 qualifying guidelines for participation. Emphasis will be placed on penalties for dishonesty and violation  
59 regulations for participation.

**60 Q IS SENAWAVE FINANCIALLY AND TECHNICALLY CAPABLE OF PROVIDING LIFELINE SERVICE IN  
61 ACCORDANCE WITH THE FCC'S RULES?**

62 A Yes, the core business of Senawave already lies within its current customer base of whom, none are  
63 lifeline recipients and Senawave will not rely solely on Lifeline services for revenue. We have established  
64 a definite need, as we spread infrastructure , to extend service to underserved buildings in a number of  
65 locations that are also deficient in current internal wiring infrastructure. In many of these locations we  
66 have developed an interface with our newest technology that allows us to bring service to older wiring  
67 and upgrade the speed of service without extremely extensive renovations to wiring. These are often  
68 buildings where seniors and low income recipients reside and don't have access to upgraded service.  
69 Typically this leaves these individuals seriously underserved and overcharged for basic service. In short

70 this application is an adjunct to facilitate expansion to a market segment that is desperately in need.  
71 Because of our position as a provider, we have more flexibility in the quality of service we provide.  
72 It is our intent to supercede minimal FCC requirements of 10/1 Mbps to provide typically 25/10 Mbps  
73 and instead of 150 GB of data, we will provide unlimited data transmission with our service.

74 **Q HAS SENAWAVE BEEN CERTIFIED AS AN ETC IN ANY OTHER STATES?**

75 **A** Senawave has not requested certification in any other State. Senawave is a wholly owned Utah  
76 Company operating only in the State of Utah employing Utah residents and providing local service.

77 **Q DOES SENAWAVE INTEND TO NOTIFY REGULATORS OF CHANGES TO ITS LIFELINE OFFERING?**

78 **A** Senawave understands the regulatory guidelines necessary to change service offerings at any time  
79 and as such will file all necessary proceedings with the FCC and Utah State regulators should the  
80 company decide to expand or alter their product offering in Lifeline services.

81 **Q DOES SENAWAVE INTEND TO COMPLY WITH ALL UTAH STATE AND FEDERAL REQUIREMENTS?**

82 **A** Without question!!! Senawave understands the necessity of strict adherence to all guidelines of  
83 Federal and State legislation and as such is not willing to risk violation in any format. Review will  
84 made on all yearly or monthly updates to program designations and implemented in marketing  
85 and qualifying specifications.

86 **Q WOULD DESIGNATION OF SENAWAVE AS AN ETC IN UTAH SERVE THE PUBLIC INTEREST?**

87 **A** Yes. Senawave enters the market with technology that in many cases is able to provide services to  
88 retrofit and upgrade service to aging facilities without expensive rewiring. Often these facilities are  
89 inhabited by seniors or low income families / individuals that are often in need of assistance to provide  
90 service for current technology/devices. Projects facilitated in this manner include: Brigham  
91 Apartments; Solitude Ski Resort; Carlton Towers. Also to be taken into consideration, is the efficiency in  
92 in which we are able to establish service through our wireless transmission of Broadband Internet  
93 service in substantially short order. Technology advances allow much more flexibility in terms of  
94 high speed, serviceability and overall reliability in today's market. Because we are local and small

95 business category, we remain more flexible to consider individual needs and decisions are made  
96 in conjunction with community interests rather than total corporate interests.

97 Q **DOES THIS CONCLUDE YOUR TESTIMONY?**

98 A Yes