

Lance J.M. Steinhart, P.C.
Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: info@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

December 4, 2018

VIA ELECTRONIC DELIVERY

Utah Public Service Commission
Attn: Gary Widerburg
160 East 300 South, 4th Floor
Salt Lake City, UT 84111

Re: i-wireless, LLC; Docket No. 18-2526-01
Supplement to Petition

Dear Mr. Widerburg:

Attached please find for filing in the above-referenced docket a Supplement to the Petition of i-wireless, LLC to Amend its Designation as an Eligible Telecommunications Carrier in the State of Utah to Participate in the Utah Universal Service Fund.

I hereby certify that a true and correct copy of the above referenced Supplement was filed upon the Commission via e-mail on December 4, 2018.

If you have any questions, or if I may provide you with any additional information, please do not hesitate to contact me at 770-232-9200 or hkirby@telecomcounsel.com. Thank you for your attention to this matter.

Respectfully submitted,

s/ Heather Kirby

Heather Kirby
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys for i-wireless, LLC

Attachments

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

)	
Petition of i-wireless, LLC to Amend its)	
Designation as an Eligible Telecommunications)	
Carrier in the State of Utah to Participate in the)	Docket No. 18-2526-01
Utah Universal Service Fund)	
)	

SUPPLEMENT TO PETITION

I. INTRODUCTION

i-wireless, LLC (“i-wireless” or the “Company”), by the undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Public Service Commission of Utah (“Commission”), hereby supplements its pending Petition to Amend its Designation as an Eligible Telecommunications Carrier (“ETC”) to include authorization to receive Utah Universal Service Fund (“Utah USF”) support for Lifeline service within the State of Utah.

Through receipt of Utah USF support, i-wireless³ will provide enhanced service offerings to customers in Utah who already enjoy i-wireless’ affordable wireless plans and quality customer service, and to prospective low-income customers who are otherwise unable to afford them, or were previously ignored by traditional carriers, therefore expanding the availability and scope of wireless services throughout the State of Utah.

¹ 47 U.S.C. § 214(e)(2)

² 47 C.F.R. §§ 54.101-54.207.

³ i-wireless hereby clarifies that the Company is not affiliated with a company named “iWireless” which, according to <https://www.iwireless.com>, was acquired by T-Mobile and is no longer providing service as of 9/30/18. i-wireless’ retail wireless website is <https://www.krogeriwireless.com/>, and its Lifeline website is www.accesswireless.com.

II. AMENDED PROPOSED ENHANCED LIFELINE OFFERING

Per Utah Administrative Code R746-8-403(2)(a)(ii), Utah USF support of \$3.50 per Lifeline subscriber per month is available for subscription to a service that, for wireless Lifeline, meets FCC broadband Lifeline requirements as set forth in 47 C.F.R. 54.408 and allows, at no charge beyond the basic monthly fee, unlimited texting and at least 750 voice minutes per month.” In light of changes to the FCC’s minimum service standards which take effect December 1, 2018, i-wireless hereby updates its proposed Utah USF offering.

As a recipient of Utah USF support, i-wireless proposes to offer Utah Lifeline customers 750 voice minutes, unlimited text messages, and 2 GB of data at a net cost to the consumer of \$5.00 per month, with the data allowance increasing annually in accordance with federal mobile broadband minimum service standards as set forth in 47 C.F.R. 54.408. Without access to Utah USF support, i-wireless will provide Utah customers, as of December 1, 2018, either a voice plan with 1,000 voice minutes, unlimited text, and 50 megabytes (MB) of data (500 MB for existing “legacy” customers) or a broadband plan with 2 gigabytes (GB) of data at no net cost, and the ability to purchase voice and text services. Lifeline customers may purchase, at their option, additional credits (“TopUp”) as maintained on www.accesswireless.com, which will be as follows as of December 1, 2018:

	Purchased Minutes	Text (SMS/MMS)	Data
\$5 Card	250	Unlimited	250 MB
\$10 Card	500	Unlimited	500 MB
\$25 Card	Unlimited	Unlimited	2 GB
\$35 Card	Unlimited	Unlimited	3 GB
\$50 Card	Unlimited	Unlimited	10 GB

* Unlimited minutes and texts expire after 30 days from the date the funds were applied to the account; limited minute and data allotments do not expire.

III. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST

i-wireless' proposed Utah enhanced offering meets the requirements as outlined by the Commission to be eligible for Utah USF support. The proposed Utah Enhanced plan would provide 750 additional voice minutes in comparison to i-wireless' national broadband plan, and more than triple the data in comparison to the voice plan. Without Utah USF support, an i-wireless Lifeline customer would have to spend at least \$15.00 to reach the level of benefits of the proposed Utah Enhanced plan. For example, the most cost-effective way for a customer on i-wireless' voice plans to reach 2 GB of data would be to purchase the \$25.00 TopUp. A customer on i-wireless' broadband plan would spend \$15.00 to obtain 750 voice minutes, by purchasing both a \$5.00 and a \$10.00 TopUp. By allowing i-wireless to receive Utah USF support and offer the proposed Utah Enhanced plan, i-wireless' customers will receive more benefits, and for a \$5.00 monthly plan cost will receive considerably more than a \$5.00 TopUp purchase would provide. Customers who fail to make the monthly plan payment would be automatically moved to i-wireless' national voice plan in order to avoid loss of Lifeline benefits, and i-wireless would not seek Utah USF reimbursement for customers in a month where they did not pay for and receive the Utah Enhanced plan benefits.

Approving i-wireless' instant Petition to participate in the Utah USF will further the Commission's universal service goals to the benefit of Lifeline-eligible consumers by enabling i-wireless to provide an enhanced Lifeline offering, to its existing Utah Lifeline subscribers as well as to eligible subscribers yet to enroll. Specifically, i-wireless will be able to offer increased supported service to low-income consumers (after application of all available Utah USF and federal USF Lifeline support), thereby increasing consumer choice and access to telephone and broadband services for Utah residents.

IV. CONCLUSION

WHEREFORE, i-wireless respectfully requests that the Commission promptly approve i-wireless' Petition seeking to amend its ETC designation in the State of Utah to include the right to seek support from the Utah Universal Service Fund.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
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

Attorneys for i-wireless, LLC

December 4, 2018

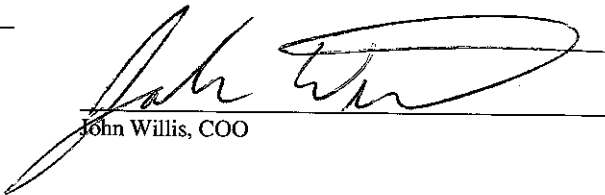
CERTIFICATION

State of Kentucky)
)
County of Campbell)

I, John Willis, being first duly sworn upon oath, depose and state that I am the Chief Operating Officer (COO) of i-wireless, LLC, as such am authorized to make this certification on its behalf; that I have read the foregoing Supplement; that I know the contents thereof; and that the matters stated therein are true and correct to the best of my knowledge.

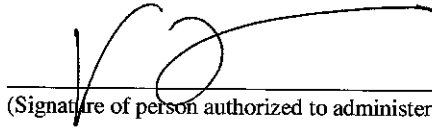
I declare under penalty of perjury that the foregoing is true and correct.

Dated: 12/4/18



John Willis, COO

Subscribed and sworn to before me this 4 day of December 2018.

(Notary Seal) 
(Signature of person authorized to administer oath)

My Commission Expires: 8/12/2019

