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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of Telrite Corporation's Petition to Amend Designation as an Eligible Telecommunications Carrier to Participate in the Utah Universal Service Fund	Docket No. 18-2553-01
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**PREFILED DIRECT TESTIMONY OF BRIAN RATHMAN**

Telrite Corporation d/b/a Life Wireless ("Telrite") hereby submits the Prefiled Direct  
Testimony of Brian Rathman in this docket.

DATED this 30th day of November 2018.

HATCH, JAMES & DODGE



/s/

Phillip J. Russell

*Attorneys for Telrite Corporation d/b/a Life Wireless*

Certificate of Service  
Docket No. 18-2533-01

I hereby certify that a true and correct copy of the foregoing Prefiled Direct Testimony of  
Brian Rathman was served by email this 30th day of November 2018 on the following:

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/s/

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of Telrite Corporation's Petition  
to Amend Designation as an Eligible  
Telecommunications Carrier to Participate in  
the Utah Universal Service Fund

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Docket No. 18-2533-01

**Direct Testimony of Brian Rathman**

**On Behalf of**

**Telrite Corporation d/b/a Life Wireless**

**November 30, 2018**

1 **INTRODUCTION AND SUMMARY**

2 **Q: PLEASE STATE YOUR NAME, YOUR POSITION WITH TELRITE**  
3 **CORPORATION AND YOUR BUSINESS ADDRESS.**

4 A: My name is Brian Rathman. I am the Chief Technology Officer for Telrite  
5 Corporation, Inc. ("Telrite"). My business address is 2300 Windy Ridge Parkway, Suite  
6 350S, Marietta, GA 30067.

7 **Q: PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

8 A: I have a BS computer engineering from the Georgia Institute of Technology and  
9 an MS in electrical and computer engineering also from the Georgia Institute of  
10 Technology.

11 **Q: PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL BACKGROUND AND**  
12 **QUALIFICATIONS.**

13 A: I have worked over 19 years in telecommunications, primarily in Operations,  
14 Compliance, Regulatory, IT, and Carrier interfaces. I have worked for Telrite in several  
15 capacities since 2001 and have been responsible for the management and development of  
16 Telrite's current in-house systems including Billing, CRM, and all other network  
17 resources. I have been intimately involved with our Lifeline offering since its inception in  
18 October 2010 with an initial focus on the build out of our order entry, customer support,  
19 and back office systems required for maintaining compliance with FCC and state specific  
20 rules and regulations. I have worked closely with various state commissions, the FCC,  
21 and USAC to gain our original approvals and maintain our continued good standing.

22 **Q: PLEASE DESCRIBE YOUR CURRENT POSITION AND RESPONSIBILITIES.**

23 A: As Chief Technology Officer for Telrite, I am responsible for the day-to-day  
24 operation of our network and IT infrastructure as well as the development of other  
25 business opportunities outside of our Lifeline product. I also interact with and help to  
26 oversee on a daily basis Customer Service, Marketing, Sales, Compliance, and  
27 Operations in general.

28 **Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

29 A: No, I have not.

30 **Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE UTILITY REGULATORY**  
31 **COMMISSIONS IN OTHER STATES?**

32 A: No, I have not.

33 **Q: WHAT IS TELRITE?**

34 A: Telrite is a Georgia corporation with its principal offices located at 4113  
35 Monticello Street, Covington, Georgia 30014.

36 Telrite operates as a wireless Eligible Telecommunications Carrier (“ETC”) in the  
37 states of Arizona, Arkansas, California, Colorado, Georgia, Illinois, Indiana, Iowa,  
38 Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Missouri,  
39 Mississippi, Nebraska, Nevada, North Dakota, Ohio, Oklahoma, Pennsylvania, Rhode  
40 Island, South Carolina, Texas, Utah, Vermont, West Virginia, and Wisconsin, as well as  
41 in Puerto Rico and the US Virgin Islands. For its wireless services, the Company resells  
42 the services of AT&T Mobility, Inc. as well as the network of T Mobile. Telrite operates  
43 its Lifeline business under the name Life Wireless.

44 **Q: DOES TELRITE CURRENTLY PROVIDE LIFELINE SERVICES IN UTAH?**

45 A: Yes. On June 14, 2013, in Docket No. 12-2553-01, the Commission issued an  
46 Order Approving a Settlement Stipulation signed by Telrite, the Division of Public  
47 Utilities, and the Office of Consumer Services (“Settlement Stipulation”), which granted  
48 Telrite’s application seeking designation as a limited Eligible Telecommunications  
49 Carrier in Utah. Telrite offers wireless Lifeline services to subscribers in Utah today and  
50 has done so since 2013. That Settlement Stipulation included the explicit condition that  
51 “Telrite is not currently seeking any Utah USF funding. If Telrite seeks Utah USF  
52 funding in the future, Telrite will file a separate application requesting such state  
53 support.”

54 **Q: DID TELRITE SUBMIT A PETITION TO AMEND ITS DESIGNATION AS AN**  
55 **ELIGIBLE TELECOMMUNICATIONS CARRIER?**

56 A: Yes. On November 9, 2018, Telrite filed a petition with the Commission to  
57 amend its designation as an ETC to include authorization to receive Utah Universal  
58 Public Telecommunications Service Support Fund (“Utah USF”) support for Lifeline  
59 service within the State of Utah.

60 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

61 A: The purpose of my testimony is to explain how Telrite meets the Commission’s  
62 requirements for receipt of Utah USF support.

63 **Q: WHAT LIFELINE SERVICES WILL TELRITE OFFER TO QUALIFYING**  
64 **UTAH CONSUMERS IF THE COMMISSION APPROVES TELRITE'S**  
65 **REQUEST TO RECEIVE UTAH USF SUPPORT?**

66 A: Utah provides ETCs with up to an additional \$3.50 per month for each Lifeline  
67 subscriber in addition to the \$9.25 monthly benefit provided under the federal Lifeline  
68 program. If this Petition is granted and Telrite is authorized to receive funds from the  
69 Utah USF, Telrite intends to offer its current Utah Lifeline subscribers 750 minutes, 2 GB  
70 mobile broadband Internet access and unlimited SMS text messaging. New enrollees will  
71 receive a plan consisting of a new Android smartphone, 750 minutes, 2 GB of mobile  
72 broadband Internet access and unlimited SMS text messaging. The smartphones will be  
73 Wi-Fi capable and capable of being used as a Wi-Fi hotspot.

74 In addition to these no-cost-to-subscribers voice and data services, Telrite's  
75 Lifeline plan includes custom calling features including Caller ID, Call Waiting, Call  
76 Forwarding, 3-Way Calling, Voice Mail, No Roaming charges and free access to  
77 Customer Care by dialing 611 from customers' Life Wireless handset or by dialing 1-  
78 888-543-3620 from any wireline phone. All plans include domestic long-distance at no  
79 extra per-minute charge. Calls to 911 emergency services are always free, regardless of  
80 service activation or availability of minutes. Additional minutes and data are available for  
81 purchase through any Money Gram location and on the Company's website.

82 Telrite's proposed offering clearly meets the Utah requirements for Utah USF  
83 support and also complies with (and exceeds) the federal minimum service standards in  
84 effect as of December 1, 2018.

85 **Q: WILL THE ENHANCED TELRITE LIFELINE PLAN COMPLY WITH THE**  
86 **COMMISSION'S RULES GOVERNING ELIGIBILITY TO RECEIVE UTAH**  
87 **USF SUPPORT?**

88 A: Yes. Telrite's enhanced bundled mobile broadband data and voice Lifeline service  
89 will meet the Commission's minimum service standard for receipt of Utah USF support  
90 because it will provide 750 wireless voice minutes and unlimited texting for no additional  
91 charge and will meet the FCC requirements for broadband Lifeline service. The FCC's  
92 rules, effective December 1, 2018, require mobile broadband data service providers to  
93 offer at least 2 GB of mobile broadband data service at a minimum of 3G speed to qualify  
94 for broadband federal Lifeline support. The mobile broadband data portion of Telrite's  
95 bundled voice and data Lifeline service includes 2 GB of data at a minimum of 3G speed.

96 **Q: HOW WILL THE ENHANCED TELRITE LIFELINE PLAN DIFFER FROM**  
97 **THE CURRENT TELRITE LIFELINE PLAN OFFERED TO QUALIFYING**  
98 **UTAH CONSUMERS?**

99 A: As of December 1, 2018, when the FCC's minimum service standards for wireless  
100 Lifeline increase, Telrite's unenhanced Lifeline plan offers current and new subscribers  
101 in Utah 500 minutes, 2 GB of data, unlimited SMS text messaging and 25 MMS. New  
102 subscribers also receive a new smartphone when enrolling. The enhanced Lifeline plan  
103 includes 750 minutes, 2 GB of data, unlimited SMS text messaging and 25 MMS.



104 **Q: WHAT ARE THE REQUIREMENTS FOR RECEIPT OF UTAH USF SUPPORT?**

105 A: The requirements for eligibility to receive Utah USF support are set forth in Utah  
106 Code § 54-8b-15 and Utah Administrative Code R746-8-403. Telrite meets each of these  
107 requirements.

108 **Q: IS TELRITE ELIGIBLE TO RECEIVE UTAH USF SUPPORT UNDER UTAH**  
109 **CODE § 54-8b-15?**

110 A: Yes. Section 54-8b-15(15) provides that “[a] facilities-based or nonfacilities-  
111 based wireless telecommunications provider is eligible for distributions from the  
112 Universal Telecommunications Service Support Fund under the lifeline program . . .”  
113 Telrite, as a predominately nonfacilities-based wireless telecommunications provider, is  
114 eligible for distributions from the Utah USF to support its Lifeline service.

115 **Q: DOES TELRITE MEET THE REQUIREMENTS FOR RECEIPT OF UTAH USF**  
116 **SET FORTH IN R746-8-403?**

117 A: Yes. R746-8-403 includes conditions for receipt of Utah USF support that are  
118 applicable to all ETCs, as well as minimum service standards that are applicable to  
119 wireless ETCs. Telrite meets each of these conditions. The Commission’s rules provide  
120 that “an ETC may receive an ongoing distribution through ongoing participation in a  
121 Commission-approved Lifeline program upon a specific finding of public interest by the  
122 Commission.” Amendment of Telrite’s ETC designation to include authorization to  
123 receive Utah USF support will serve the public interest.

124 R746-8-403(2) of the Utah Administrative Code further provides that Utah USF  
125 support “may not exceed \$3.50 per Lifeline subscriber per month of subscription to a

126 service” that meets certain minimum service standards. Specifically, the Lifeline service  
127 must (1) meet FCC Lifeline requirements for broadband set forth in 47 C.F.R. § 54.408  
128 and “for wireless Lifeline, allow[s], at no charge beyond the basic monthly fee, unlimited  
129 texting and at least 750 voice minutes per month” or (2) meet FCC requirements for  
130 broadband set forth in 47 C.F.R. § 54.408 and not include a voice component. Telrite’s  
131 enhanced Lifeline plans meet the first prong of the minimum service standards by  
132 offering mobile broadband Internet access service that meets the FCC’s standards,  
133 unlimited texting, and at least 750 airtime minutes for no additional charge to Lifeline-  
134 eligible consumers.

135 **Q: WILL TELRITE COMPLY WITH THE COMMISSION’S RULES GOVERNING**  
136 **ETCs THAT ARE APPROVED TO RECEIVE UTAH USF SUPPORT FOR**  
137 **LIFELINE SERVICE?**

138 A: Yes. Telrite will comply with the Commission’s rules governing ETCs that are  
139 approved to participate in Utah’s Lifeline program. Telrite will comport with the  
140 requirements as detailed in R746-8-403(3) and (4). These include: providing potential  
141 Lifeline subscribers with application materials and information; verifying the eligibility  
142 of Lifeline applicants using the FCC’s national verifier system or, if the national verifier  
143 system is not operational, through Utah’s Lifeline program administrator; submitting a  
144 Lifeline subscriber list to the Division of Public Utilities by May 1 each year; and neither  
145 requiring nor prohibiting a Lifeline subscriber from purchasing additional services from  
146 the ETC.

147 **Q: WHY IS IT IN THE PUBLIC INTEREST FOR TELRITE TO RECEIVE**  
148 **DISBURSEMENTS FROM THE UTAH USF?**

149 A: Expansion of Telrite's designation as an ETC to include Utah USF support will  
150 serve the public interest, as required by R746-8-403(1) of the Commission's rules, by  
151 enabling Telrite to provide enhanced Lifeline benefits to Utah Lifeline customers. These  
152 enhanced Lifeline benefits will provide a valuable alternative to the existing Lifeline  
153 services available to low-income Utah households. Telrite's receipt of Utah USF support  
154 will benefit low-income Utah consumers by increasing the number of Lifeline providers  
155 able to use the additional Utah USF support to offer enhanced Lifeline service. Telrite's  
156 offer of additional airtime minutes to its subscribers will better enable those subscribers  
157 to meet all their telecommunications requirements. Utah Lifeline consumers will have  
158 more minutes to speak with employers, doctors, government services, and to remain in  
159 contact with family members and friends. Low-income Utah residents would benefit  
160 from increased competition within the Lifeline service market. Increased competition  
161 leads to additional consumer choices and delivery of greater value services to consumers.  
162 If the Commission authorizes Telrite to receive Utah USF support, Telrite will be able to  
163 deliver enhanced service choices and greater value to qualifying Utah households as  
164 described in this testimony and the Petition.

165 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

166 A. Yes.