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April 23, 2019

**VIA ELECTRONIC DELIVERY**

Utah Public Service Commission  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111

Re: Global Connection Inc. of America d/b/a STAND UP WIRELESS  
Petition to Amend Designation as an ETC

To Whom It May Concern:

Attached please find for filing the Petition of Global Connection Inc. of America d/b/a STAND UP WIRELESS to Amend its Designation as an Eligible Telecommunications Carrier in the State of Utah to Participate in the Utah Universal Service Fund ("Petition").

I hereby certify that a true and correct copy of the above referenced Petition was filed upon the Commission via e-mail on April 23, 2019.

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 Global Connection Inc. of America  
d/b/a STAND UP WIRELESS*

Attachments

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Petition of Global Connection )  
Inc. of America dba STAND UP WIRELESS )  
To Amend its Designation as an Eligible ) Docket No. \_\_\_\_\_  
Telecommunications Carrier in the State of Utah )  
to Participate in the Utah Universal Service Fund )

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**PETITION OF GLOBAL CONNECTION INC. OF AMERICA  
DBA STAND UP WIRELESS TO AMEND ITS DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER IN THE STATE OF UTAH  
TO PARTICIPATE IN THE UTAH UNIVERSAL SERVICE FUND**

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America dba STAND UP WIRELESS*

April 23, 2019

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**PETITION OF GLOBAL CONNECTION INC. OF AMERICA  
DBA STAND UP WIRELESS TO AMEND ITS DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER IN THE STATE OF UTAH  
TO PARTICIPATE IN THE UTAH UNIVERSAL SERVICE FUND**

**I. INTRODUCTION**

Global Connection Inc. of America d/b/a STAND UP WIRELESS (“Stand Up 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”)<sup>1</sup>, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Public Service Commission of Utah (“Commission”), hereby petitions the Commission to Amend the Company’s 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. As explained in the instant Petition, Stand Up Wireless will enhance its current Lifeline service offerings to provide additional airtime to qualifying low-income Utah households based upon its receipt of Utah USF support. Stand Up Wireless seeks ETC designation solely to provide Lifeline service to qualifying Utah consumers; it has not and will not seek access

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<sup>1</sup> 47 U.S.C. § 214(e)(2)  
<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high-cost areas.<sup>3</sup> The Commission’s grant of Stand Up Wireless’ Petition will serve the public by allowing qualifying Utah low-income households to receive enhanced Lifeline offerings and benefit from increased competition in the market for wireless Lifeline service.

As demonstrated herein, and as certified in Exhibit 1 to this Petition, Stand Up Wireless meets all the statutory and regulatory requirements for an expansion of its designation as an ETC in the State of Utah to include participation in the Utah Universal Service Fund (“Utah USF”) program, including the requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*.<sup>4</sup> Accordingly, the Company respectfully requests that the Commission expeditiously approve this Petition to Amend Stand Up Wireless’ ETC Designation to include authorization to receive Utah USF support for Lifeline service within the State of Utah.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Petition should be addressed to:

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<sup>3</sup> Given that Stand Up Wireless only seeks support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to the Company.

<sup>4</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline and Link Up Reform Order*”).

## II. COMPANY OVERVIEW

Global Connection Inc. of America (“Global Connection”) is a Georgia Corporation.<sup>5</sup> Its principal office is located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global Connection provides commercial mobile radio service (“CMRS”) throughout the United States under its d/b/a, “Stand Up Wireless.” Stand Up Wireless provides prepaid wireless telecommunications services to consumers by using primarily the T-Mobile USA (“T-Mobile”) wireless network on a wholesale basis. Stand Up Wireless has been designated as a wireless ETC in Arkansas, Arizona, California, Colorado, Georgia, Idaho, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin, and West Virginia. The FCC recently approved the Company’s transfer of majority control from Global Connection Holdings Corporation to Odin Mobile, LLC (the “Transaction”, which this Commission approved in Docket No. 17-2432-01). As the final step in approving the Transaction, the FCC released a Public Notice<sup>6</sup> approving the Company’s revised Amended Compliance Plan, which was filed in light of the Transaction on April 16, 2018.<sup>7</sup> The Company is in process of consummating the Transaction.

On March 13, 2014, the Commission issued an Order designating Stand Up Wireless as an ETC.<sup>8</sup> The Commission provided in the ETC Order that Stand Up Wireless’ ETC designation was subject to several explicit conditions, including the following: “Stand Up Wireless is not currently

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<sup>5</sup> Global Connection was incorporated in the State of Georgia on June 1, 1998.

<sup>6</sup> See <https://docs.fcc.gov/public/attachments/DA-18-854A1.pdf>.

<sup>7</sup> See [https://ecfsapi.fcc.gov/file/10416110300883/Global%20Connection%20FCC%20Amended%20Wireless%20\(%2B%20Wireline\)%20CP%20\(April%202018\).pdf](https://ecfsapi.fcc.gov/file/10416110300883/Global%20Connection%20FCC%20Amended%20Wireless%20(%2B%20Wireline)%20CP%20(April%202018).pdf).

<sup>8</sup> *In the Matter of the Petition of Global Connection Inc. of America dba STAND UP WIRELESS for Designation as an Eligible Telecommunications Carriers in the State of Utah*, Order Approving Settlement Stipulation and Application for Designation as an Eligible Telecommunications Carrier, Docket No. 13-2432-01, March 13, 2014 (“ETC Order”).

seeking any Utah USF funding. If Stand Up Wireless seeks Utah USF funding in the future, Stand Up Wireless will file a separate application requesting such support.”<sup>9</sup> Stand Up Wireless now seeks the Commission’s authorization to obtain Utah USF funds so that it may provide an enhanced Lifeline service to qualifying low-income Utah residents. As demonstrated in the instant Petition, Stand Up Wireless is eligible for Utah USF.

Stand Up Wireless’ prepaid wireless services remain affordable, easy-to-use, and attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. Stand Up Wireless offers consumers simple and affordable prepaid calling plans, a variety of prepaid service plans, easy-to-use handsets and high-quality customer service. Stand Up Wireless does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service.

Through receipt of Utah USF support, Stand Up Wireless will provide enhanced service offerings to customers in Utah who already enjoy Stand Up 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. As demonstrated in the Commission’s ETC Order, Stand Up Wireless has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC’s Rules (47 C.F.R. § 54.101(a)) throughout Utah.

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<sup>9</sup> ETC Order, at 2.

### **III. STAND UP WIRELESS SATISFIES THE COMMISSION'S REQUIREMENTS FOR ETC DESIGNATION AND IS ELIGIBLE FOR UTAH UNIVERSAL SERVICE FUND SUPPORT**

By this Petition, Stand Up Wireless seeks the Commission's authorization to obtain Utah USF support so that it may provide an enhanced Lifeline service to qualifying low-income Utah households. As described below, Stand Up Wireless meets Utah's statutory and regulatory requirements for receipt of Utah USF support as outlined in Utah Code § 54-8b-15 and Utah Administrative Code R746-8-403. Stand Up Wireless further commits to complying with any additional requirements the Commission may believe is necessary for Utah USF support.

#### **A. Stand Up Wireless is a Non-Facilities-Based Lifeline ETC Eligible for Support.**

The Utah State Legislature recently enacted S.B. 130, which amends statutory provisions related to the Utah USF. The amended statute, codified as Utah Code § 54-8b-15, became effective as of July 1, 2017. The amendments to section 54-8b-15 relate to several aspects of the Utah USF, including funding, calculation of a contribution charge, and permitted uses of support. In addition, the amendments provide the following:

*A facilities-based or non facilities-based wireless telecommunications provider is eligible for distribution from the Universal Telecommunications Service Support Fund under the [L]ifeline program described in Subsection 3(b) for providing [L]ifeline service that is consistent with the Federal Communications Commission's [L]ifeline program for low-income consumers.<sup>10</sup>*

The amended statute further provides that the Commission "may impose reasonable conditions for providing a distribution to a wireless telecommunications provider under the [L]ifeline program."<sup>11</sup> However, the Commission "may not require a wireless telecommunications

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<sup>10</sup> Utah Code § 54-8b-15(15)(a) (2017) (emphasis added). Subsection 3(b) provides that the Commission shall use funds in the Utah USF to "fund a [L]ifeline program that covers the reasonable cost to an eligible telecommunications carrier, as determined by the [C]ommission, to offer [L]ifeline service consistent with the Federal Communications Commission's [L]ifeline program for low-income consumers." Utah Code § 54-8b-15(3)(b).

<sup>11</sup> Utah Code § 54-8b-15(15)(b).



provider to offer unlimited local calling as a condition of receiving a distribution under the [L]ifeline program described in Subsection 3(b).”<sup>12</sup> Thus, the Commission has the right, but not the obligation, to impose conditions on wireless carriers’ receipt of funds from the Utah USF. As a non-facilities-based wireless telecommunications provider, Stand Up Wireless meets the criteria as laid out in the amended Utah statute and is eligible for distributions from the Utah USF based on the requirements detailed in the Utah rules.

**B. Stand Up Wireless Meets the Requirements of the Federal Lifeline Program.**

As provided in the Commission’s ETC Order, Stand Up Wireless is a designated ETC in the State of Utah that provides non-facilities-based wireless Lifeline service to low-income Utah residents that meet the requirements of the federal Lifeline program. Stand Up Wireless provides service that is consistent with the federal requirements for Lifeline service as discussed below. First, Stand Up Wireless operates as a common carrier in the State of Utah, as defined in 47 U.S.C. § 153(11). Second, Stand Up Wireless offers all of the services and functionalities required by the Federal Communications Commission’s (“FCC”) rules for eligible voice telephony and broadband Internet access service (“BIAS”).<sup>13</sup> Eligible voice telephony services must provide the following: voice grade access to the public switched network; local usage; access to emergency services; and toll limitation for qualifying low-income consumers. Eligible BIAS services must provide the following: the capability to transmit data and to receive data from all or substantially all Internet endpoints.

Since this Commission designated Stand Up Wireless as an ETC, Stand Up Wireless has provided each of the required voice and BIAS services throughout its designated service area in

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<sup>12</sup> Utah Code § 54-8b-15(15)(c).

<sup>13</sup> 47 C.F.R. §§ 54.101(a); 54.202(a).

the State of Utah. Stand Up Wireless provides voice grade access to the public switched telephone network through the networks of underlying facilities-based wireless carriers. Stand Up Wireless' usage plans are different from, but comparable to, ones offered by the ILEC in the same designated service area. Stand Up Wireless also provides access to emergency services provided by local government or public safety officials, including 911 and E911, where available, for free and without regard to whether a customer's handset device is activated or has available airtime. Stand Up Wireless will not provide toll limitation service ("TLS") but, like most wireless providers, Stand Up Wireless does not differentiate domestic long-distance usage from local usage, and all usage is paid for in advance.

Finally, Stand Up Wireless also provides its Lifeline customers with BIAS that has the ability to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service."<sup>14</sup>

**C. Stand Up Wireless is an Ongoing Participant in a Commission-approved Lifeline Program that is Eligible for Utah USF Support.**

The Commission has also adopted requirements for Lifeline support, which are outlined in Utah Administrative Code R746-8-403. The Commission's rules stipulate that Lifeline support "may not exceed \$3.50 per Lifeline subscriber per month of subscription to a service that meets FCC broadband Lifeline requirements as set forth in 47 C.F.R. 54.408; and for wireless Lifeline, allows, at no charge beyond the basic monthly fee, unlimited texting and at least 750 voice minutes per month."<sup>15</sup> Furthermore, the rules provide that ETCs will be eligible for ongoing Lifeline distribution if the company is an ongoing participant in an approved Lifeline program if the

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<sup>14</sup> 47 C.F.R. § 54.202(a), at ¶ 30; *see also* 47 C.F.R. § 8.2(a) (defining "broadband Internet access service").

<sup>15</sup> Utah Admin. Code R746-8-403(2)(a)(i).

Commission finds it is in the public interest.<sup>16</sup> Stand Up Wireless is currently an approved wireless Lifeline provider in the State of Utah. Its offerings, as further detailed below, meet the requirements outlined by this Commission for eligibility to receive Utah USF support.

**D. Stand Up Wireless Will Use Utah USF Support to Offer an Enhanced Lifeline Offering to Eligible, Low-Income Households in Utah.**

The Utah USF provides ETCs with up to an additional \$3.50 per month, per Lifeline customer of support, beyond monthly Lifeline benefit provided under the federal Lifeline program (currently \$9.25 per month, per eligible customer).<sup>17</sup> As discussed above, Stand Up Wireless is currently an approved, wireless Lifeline provider in the State of Utah, offering eligible Lifeline customers with voice services, text messaging, and data to access wireless broadband Internet service. Stand Up Wireless currently offers the following Lifeline service packages:

EFFECTIVE 12/1/2018

	PLAN DESCRIPTION	VOICE	TEXT (SMS)	DATA (HIGH SPEED) 4G/LTE	DATA (THROTTLED) 3G	LIFELINE PRICE
1	Lifeline Voice Plan	1,000	Unlimited	500 MB	N/A	\$0.00
2	Lifeline Data Plan*	500	Unlimited	2 GB	N/A	\$0.00
3	Unlimited w/ 1GB Data	Unlimited	Unlimited	1 GB	1 GB	\$10.00
4	Unlimited w/ 3GB Data	Unlimited	Unlimited	3 GB	1 GB	\$20.00
5	Unlimited w/ 8GB Data	Unlimited	Unlimited	8 GB	0	\$30.00

\*Available only to existing subscribers enrolled prior to 12/1/18

ADDITIONAL AIRTIME	VOICE	TEXT (SMS)	DATA (HIGH SPEED)	DATA (THROTTLED)
\$5.00 "Top Up"	250	0	250 MB	0

<sup>16</sup> Utah Admin. Code R476-8-403(1).

<sup>17</sup> See Utah Admin. Code R746-341-6(A).

**i. Proposed Enhanced Lifeline Offering**

As a recipient of Utah USF support, Stand Up Wireless proposes to offer Utah Lifeline customers an enhanced plan offering with 800 minutes, unlimited text messages, and 2 gigabytes (GB) of data each month, at no cost after application of federal and Utah USF support. Stand Up Wireless will continue to provide a free handset device with all Lifeline plans, or a free SIM card for customers that bring their own device, as well as access to Caller ID, Call Waiting, 3-Way Calling, and Voicemail Custom Calling features at no charge. Stand Up Wireless will also continue to offer additional airtime and data usage for Lifeline customers to purchase if needed (customers can purchase a Top-Up or upgrade to a discounted retail plan). Stand Up Wireless understands that its Lifeline Voice Plan does not meet the requirements for Utah USF support. The Company would only seek Utah USF support for customers on the Utah Enhanced Offering, or who had upgraded to a discounted rate plan in the respective month.

Stand Up Wireless' proposed offering plainly meets the requirements as outlined by the Commission to be eligible for Utah USF support. Stand Up Wireless' proposed service offerings also comply with the minimum service standards and will enable Lifeline customers to receive the full value of their Lifeline subsidy. As discussed in detail in the following section, granting Stand Up Wireless' request for expansion of its existing ETC designation to include support from the Utah USF is in the public interest. Stand Up Wireless has targeted its services to providing exceptional offerings that meet the needs of low-income consumers and reimbursement from the Utah USF would only enhance Stand Up Wireless' ability to provide services and plans that are beneficial to this community.

**IV. DESIGNATED ETC SERVICE AREA**

The ETC Order, by approving the Stipulation and Settlement Agreement reached by parties in the docket, designated Stand Up Wireless as an ETC throughout the wire centers set forth in

Exhibit 5 to the Company's October 1, 2013 ETC petition filed in Docket No. 13-2432-01. At that time, Stand Up Wireless sought designation throughout the Sprint PCS and Verizon Wireless coverage areas, as identified by wire centers. Stand Up Wireless has since added T-Mobile as an additional underlying carrier (and is currently not providing service using the Verizon Wireless network) and seeks to expand its ETC service areas to allow the Company to provide service statewide wherever its underlying carriers have wireless network coverage, including as it may change going forward. At a minimum, Stand Up Wireless identifies in attached Exhibit 2 the additional wire centers of incumbent carriers which should be added to the Company's service area. However, the most accurate description of service area for wireless purposes is by zip code, and thus Stand Up Wireless attaches as Exhibit 3 its proposed additional service areas by zip code.

#### **V. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST**

Approving Stand Up 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 the Company to provide an enhanced Lifeline offering, thereby increasing consumer choice and access to telephone and broadband services for Utah residents. Specifically, upon grant of the instant Petition, more than 800 current Stand Up Wireless customers in Utah will immediately receive 300 more voice minutes each month—from 500 to 800 minutes, with unlimited text and 2 GB data. Further, new customers would have access to a plan with 2 GB data without a monthly net cost; without Utah USF support, new customers only have access to the Voice Plan if the need a plan with no net cost, and would pay \$10.00 to access a discounted retail plan with unlimited talk, text, and 2 GB data (1 GB high speed, 1 GB throttled to 3G). The Company's enhanced Lifeline benefits provide a valuable alternative to existing Lifeline service available to eligible Utah households. Increasing such customer choice will also spur other wireless ETC providers to compete for eligible customers by providing the highest value (*e.g.*, higher-quality handset

devices, superior customer service, etc.). Existing data clearly demonstrates the large and growing demand by low-income Utah households for wireless Lifeline services.<sup>18</sup> Additional airtime provided because of participation in the Utah USF will better enable Stand Up Wireless to assist such Lifeline customers obtain calling capacity sufficient to meet all their telecommunications needs. Such customers will have more minutes to contact (or be contacted by) current and prospective employers, health care providers, government services, and to remain in contact with family members and friends.

The public interest benefits of Stand Up Wireless' service include the convenience and security afforded by mobile service and a generous amount of voice and broadband access included without cost (after application of available Lifeline and Utah USF support). Providing Stand Up Wireless with the authority necessary to seek reimbursement for its Lifeline services from the Utah USF will only further the public interest already served by Stand Up Wireless's existing offerings by allowing the Company to provide a greater quantity of units of no-cost or discounted Lifeline services to those currently without access to essential telephone and broadband services, or those most in danger of losing wireless service altogether.

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<sup>18</sup> See LI05 Annual Low Income Support Claimed by State and Company January 2014 through March 2017 .xlsx, available at <http://www.usac.org/about/tools/fcc/filings/2017/q3.aspx>.

## VI. CONCLUSION

WHEREFORE, based on the foregoing, Stand Up Wireless respectfully requests that the Commission promptly approve Stand Up Wireless' petition seeking approval to amend its ETC designation in the State of Utah to include the right to seek support from the Utah Universal Service Fund, throughout its existing ETC designated service area as well as the additional areas requested herein.

Respectfully submitted,

*/s/ Lance J.M. Steinhart*

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*Attorneys for Global Connection Inc. of  
America dba STAND UP WIRELESS*

April 23, 2019

**EXHIBIT 1**  
**CERTIFICATION**



**CERTIFICATION**

State of Georgia )  
 )  
County of Gwinnett )

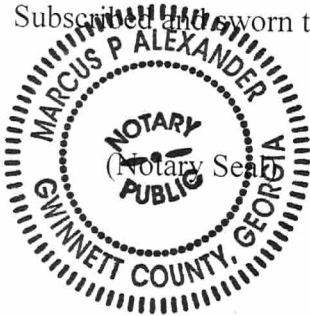
I, Eric Schimpf, being first duly sworn upon oath, depose and say that I am the Chief Operating Officer (COO) of Global Connection Inc. of America dba STAND UP WIRELESS, as such am authorized to make this certification on its behalf; that I have read the foregoing Petition of Global Connection Inc. of America dba STAND UP WIRELESS to Amend its Designation as an Eligible Telecommunications Carrier in the State of Utah to Participate in the Utah Universal Service Fund; that I know the contents thereof; and that the matters stated in the aforementioned Petition are true and correct to the best of my knowledge.

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

Dated: 4-11-19

  
Eric Schimpf, COO

Subscribed and sworn to before me this 11 day of April 2019.



  
(Signature of person authorized to administer oath)

My Commission Expires: April 3, 2020

**EXHIBIT 2**

**ADDITIONAL SERVICE AREAS  
(BY INCUMBENT CLLI)**

<b>CLLI</b>	<b>ILEC</b>	<b>WIRE CENTER</b>
CIVLUTXC	BEEHIVE TEL CO - UT	CAINEVILLE
GRSNUTXC	BEEHIVE TEL CO - UT	GARRISON
PKVYUTXC	BEEHIVE TEL CO - UT	PARKVALLEY
WJRDUT30	CELLCO PARTNERSHIP DBA VERIZON WIRELESS - UT	TOOELE
MNPLUTMA	CENTRAL UTAH TELEPHONE, INC.	MTPLEASANT
HNVLUTNM	HANKSVILLE TELCOM, INC. - UT	HANKSVILLE
WVCYUTGF	LEAP WIRELESS INTL, INC. DBA CRICKET COMM, INC.	TOOELE
EPHRUTMA	MANTI TELEPHONE CO.	EPHRAIM
SLKCUTJC	NEW CINGULAR WIRELESS PCS, LLC	DUCHESNE
SLKCUTJC	NEW CINGULAR WIRELESS PCS, LLC	TOOELE
SLKCUTJC	NEW CINGULAR WIRELESS PCS, LLC	EPHRAIM
SLKCUTJC	NEW CINGULAR WIRELESS PCS, LLC	MTPLEASANT
SLKCUTJC	NEW CINGULAR WIRELESS PCS, LLC	BICKNELL
SLKDUTYI	NEXTEL COMMUNICATIONS, INC.	TOOELE
BCKNUTXC	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.	BICKNELL
BLDRUTXC	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.	BOULDER
CRVLUTXC	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.	CIRCLEVL
LOA UTXC	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.	LOA
TOOLUTNB	SPRINT SPECTRUM L.P.	TOOELE
DRPRUTKJ	T-MOBILE USA, INC.	TOOELE
DRPRUTKJ	T-MOBILE USA, INC.	EPHRAIM
BTRGUTQA	UINTAH BASIN ELECTRONIC TELECOMMUNICATIONS	DUCHESNE
SLKDUT11	UNION TELEPHONE COMPANY	DUCHESNE
SLKCUTMA	USA MOBILITY WIRELESS, INC.	TOOELE

**EXHIBIT 3**

**ADDITIONAL SERVICE AREAS  
(BY ZIP CODE)**

**ADDITIONAL ZIP CODES**

(some may overlap with zip codes in existing ETC service area)

84001	84065	84128	84532	84745
84003	84066	84129	84540	84747
84004	84067	84302	84542	84750
84005	84070	84305	84601	84751
84007	84071	84306	84604	84753
84010	84072	84307	84606	84754
84013	84073	84308	84621	84756
84014	84074	84309	84622	84757
84015	84075	84311	84627	84759
84017	84078	84312	84629	84760
84018	84081	84313	84634	84761
84020	84082	84314	84642	84765
84021	84083	84315	84643	84766
84025	84084	84317	84645	84770
84026	84087	84318	84647	84772
84028	84088	84319	84648	84773
84029	84092	84320	84651	84775
84031	84093	84321	84652	84780
84032	84094	84322	84653	84783
84033	84095	84324	84654	84790
84035	84096	84325	84655	
84036	84097	84328	84660	
84037	84098	84329	84663	
84038	84101	84330	84664	
84040	84102	84331	84665	
84041	84103	84332	84701	
84042	84104	84333	84710	
84043	84105	84335	84713	
84044	84106	84336	84714	
84045	84107	84337	84716	
84047	84108	84338	84719	
84049	84109	84339	84720	
84050	84111	84340	84721	
84051	84112	84341	84722	
84052	84113	84401	84725	
84054	84115	84403	84726	
84055	84116	84404	84728	
84056	84117	84405	84731	
84057	84118	84414	84734	
84058	84119	84501	84737	
84060	84120	84523	84738	
84061	84121	84525	84739	
84062	84123	84526	84741	
84063	84124	84528	84743	