

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Petition of Global Connection Inc. of America)	
d/b/a STAND UP WIRELESS to Amend its)	Docket No. 19-2432-01
Designation as an Eligible Telecommunications)	
Carrier in the State of Utah to Participate in the)	
Utah Universal Service Fund)	

APPLICANT’S SUBMISSION OF DIRECT TESTIMONY

Global Connection Inc. of America d/b/a STAND UP WIRELESS, by counsel, hereby files with the Public Service Commission of Utah (“Commission”) the Direct Testimony of Eric Schimpf.

Respectfully submitted this 20th day of June, 2019.

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STAND UP WIRELESS*

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DIRECT TESTIMONY OF ERIC SCHIMPF

1 **Q: WHAT IS YOUR NAME AND BUSINESS ADDRESS?**

2 **A:** My name is Eric Schimpf. My business address is 5555 Oakbrook Parkway,
3 Suite 620, Norcross, Georgia 30093.

4 **Q: WHAT IS YOUR POSITION WITH APPLICANT?**

5 **A:** I am Chief Operating Officer of Global Connection Inc. of America d/b/a
6 StandUP Wireless (hereinafter referred to as “StandUP Wireless” or the
7 “Company”), the Applicant in this proceeding.

8 **Q: PLEASE DESCRIBE YOUR EMPLOYMENT BACKGROUND.**

9 **A:** I graduated from The Ohio State University with a Bachelor of Science degree in
10 Business, and then obtained my MBA from Northern Kentucky University. I am an
11 experienced, top tier executive with leadership roles in General Management,
12 Product Management, Business Development, and Marketing, all focused on
13 acquiring and retaining consumers for start-up and established Telecom or
14 Technology companies.

15

1 **Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF STANDUP WIRELESS.**

2 **A:** Global Connection Inc. of America (“Global Connection”) is a Georgia
3 Corporation. Global Connection provides commercial mobile radio service
4 (“CMRS”) throughout the United States under its d/b/a, “StandUP Wireless.”
5 StandUP Wireless provides prepaid wireless telecommunications services to
6 consumers by using the wireless networks of underlying facilities-based carriers
7 on a wholesale basis; at this time, StandUP Wireless intends to primarily use T-
8 Mobile USA (“T-Mobile”). Through an agreement with Prepaid Wireless Group,
9 LLC, StandUP Wireless obtains T-Mobile network services and the network
10 infrastructure and wireless transmission facilities to allow the Company to operate
11 as a Mobile Virtual Network Operator (“MVNO”). StandUP Wireless has been
12 designated as a wireless ETC in Arkansas, Arizona, California, Colorado,
13 Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland,
14 Massachusetts, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania,
15 Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin, and West
16 Virginia.

17 The FCC recently approved the Company’s transfer of majority control
18 from Global Connection Holdings Corporation to Odin Mobile, LLC (the
19 “Transaction”, which this Commission approved in Docket No. 17-2432-01). As
20 the final step in approving the Transaction, the FCC released a Public Notice
21 approving the Company’s revised Amended Compliance Plan. The Company is
22 in process of consummating the Transaction.

23

1 **Q: ARE YOU FAMILIAR WITH STANDUP WIRELESS' PETITION IN**
2 **THIS PROCEEDING?**

3 **A:** Yes, I have reviewed StandUP Wireless' Petition to Amend its Designation as an
4 Eligible Telecommunications Carrier to Participate in the Utah Universal Service
5 Fund ("UUSF") (the "UUSF Petition") and verify that the statements therein are
6 true and correct.

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

8 **A:** The purpose of my testimony is to support the UUSF Petition, and to demonstrate
9 that StandUP Wireless satisfies the Commission's requirements for receipt of
10 UUSF support and that expansion of the Company's ETC designation to include
11 participation in the UUSF, throughout its existing ETC designated service area as
12 well as the additional areas requested in the UUSF Petition, is in the public
13 interest.

14 **Q: WHAT IS THE NATURE OF STANDUP WIRELESS' REQUEST?**

15 **A:** On March 13, 2014, the Commission issued an Order in Docket No. 13-2432-01
16 designating StandUP Wireless as an ETC (the "ETC Order") throughout the
17 service area identified therein. The Commission provided in the ETC Order that
18 StandUP Wireless' ETC designation was subject to several explicit conditions,
19 including that StandUP Wireless file a separate application if the Company were
20 to seek UUSF funding in the future. StandUP Wireless now seeks the
21 Commission's authorization to obtain UUSF support throughout the Company's
22 designated service area so that it may provide an enhanced Lifeline service to
23 qualifying low-income customers in Utah—customers who either already enjoy

1 StandUP Wireless' affordable wireless plans, or prospective low-income
2 customers who are otherwise unable to afford them, or were previously ignored
3 by traditional carriers, therefore expanding the availability and scope of wireless
4 services throughout the State of Utah. StandUP Wireless also seeks to expand its
5 service area as discussed below. StandUP Wireless does not seek to amend its
6 ETC status for the purpose of receiving support from any other USF programs.

7 **Q: WHAT CHANGES IN DESIGNATED SERVICE AREA DOES STANDUP**
8 **WIRELESS' SEEK?**

9 **A:** The ETC Order, by approving the Stipulation and Settlement Agreement reached
10 by parties in the docket, designated StandUP Wireless as an ETC throughout the
11 wire centers set forth in Exhibit 5 to the Company's October 1, 2013 ETC
12 petition filed in Docket No. 13-2432-01. At that time, StandUP Wireless sought
13 designation throughout the Sprint PCS and Verizon Wireless coverage areas, as
14 identified by wire centers. StandUP Wireless has since added T-Mobile as an
15 additional underlying carrier (and is currently not providing service using the
16 Verizon Wireless network) and seeks to expand its ETC service areas to allow the
17 Company to provide service statewide wherever its underlying carriers have
18 wireless network coverage, including as it may change going forward. At a
19 minimum, StandUP Wireless identified in Exhibit 2 of the ETC Order the
20 additional wire centers of incumbent carriers which should be added to the
21 Company's service area. However, the most accurate description of service area
22 for wireless purposes is by zip code, and thus StandUP Wireless attached as
23 Exhibit 3 of the ETC Order its proposed additional service areas by zip code.

1 **Q: HOW WILL STANDUP WIRELESS' LIFELINE OFFERINGS DIFFER IF**
2 **THE COMMISSION GRANTS STANDUP WIRELESS THE ABILITY TO**
3 **RECEIVE UUSF SUPPORT?**

4 **A:** StandUP Wireless has targeted its services to provide exceptional offerings that
5 meet the needs of low-income consumers, and reimbursement from the UUSF
6 would enhance StandUP Wireless' ability to provide services and plans that are
7 beneficial to this community. StandUP Wireless currently offers Utah Lifeline
8 customers the choice of a Lifeline service plan that meets the federal voice
9 minimum service standards (currently 1,000 minutes, with unlimited text and 500
10 MB data) or a plan option which meets the federal broadband minimum service
11 standards (currently 2 GB of data, with unlimited text and 500 voice minutes).
12 As a recipient of UUSF support, StandUP Wireless will instead offer Utah
13 Lifeline customers 800 voice minutes, unlimited text messages, and 2 gigabytes
14 (GB) of data, with the data allowance increasing annually in accordance with
15 federal broadband minimum service standards as set forth in 47 C.F.R. § 54.408.

16 StandUP Wireless will continue to provide a free handset device, or a free
17 SIM card for customers that bring their own device, with all Lifeline plans, and
18 access to Voicemail, Caller ID and Call Waiting custom calling features at no
19 charge. StandUP Wireless will also continue to offer additional airtime and data
20 usage for purchase in the event that all airtime subscribed to has been exhausted
21 (calls made to StandUP Wireless customer service and 911 do not deplete
22 available airtime and can be made regardless of availability of minutes).
23 StandUP Wireless will also continue to offer additional airtime and data usage for

1 Lifeline customers to purchase if needed (customers can purchase a Top-Up or
2 upgrade to a discounted retail plan).

3 **Q: DOES STANDUP WIRELESS SATISFY THE REQUIREMENTS TO**
4 **RECEIVE UUSF SUPPORT?**

5 **A:** Yes. As described in the UUSF Petition, StandUP Wireless meets Utah's
6 statutory and regulatory requirements for receipt of UUSF support as outlined in
7 Utah Code § 54-8b-15 and Utah Administrative Code R746-8-403.

8 **Q: IS STANDUP WIRELESS A NON-FACILITIES-BASED ETC?**

9 **A:** Yes. StandUP Wireless is a designated ETC in the State of Utah that provides
10 non-facilities-based wireless Lifeline service to low income Utah residents who
11 meet the requirements of the federal Lifeline program. As I mentioned
12 previously, StandUP Wireless provides service using the wireless networks of
13 facilities-based underlying carriers such as T-Mobile. I understand that Utah
14 Code § 54-8b-15 was amended effective July 1, 2017 to allow non-facilities-based
15 wireless telecommunications providers to be eligible for distribution of UUSF
16 support, provided that the Lifeline service is consistent with Federal
17 Communications Commission ("FCC") rules governing the Lifeline program.

18 **Q: DOES STANDUP WIRELESS PROVIDE LIFELINE SERVICE**
19 **CONSISTENT WITH FCC REQUIREMENTS?**

20 **A:** Yes, StandUP Wireless provides service that is consistent with the FCC's
21 requirements for Lifeline service. First, StandUP Wireless operates as a common
22 carrier in the State of Utah, as defined in 47 U.S.C. § 153(11). Second, StandUP
23 Wireless offers all USF-supported services required by the FCC's rules, namely

1 eligible voice telephony service and broadband Internet access service (“BIAS”).
2 Eligible voice telephony services must include the following: voice grade access
3 to the public switched network; local usage; access to emergency services; and
4 toll limitation for qualifying low-income consumers. Eligible BIAS services must
5 provide the capability to transmit data and to receive data from all or substantially
6 all Internet endpoints. StandUP Wireless also advertises the availability and rates
7 for the supported services using media of general distribution as required by 47
8 C.F.R. § 54.201, and the Company’s marketing materials comply with federal
9 requirements.

10 Since this Commission designated StandUP Wireless as an ETC, StandUP
11 Wireless has provided each of the required supported services throughout its
12 designated service area in the State of Utah. StandUP Wireless provides both
13 BIAS and voice grade access to the public switched telephone network to low
14 income customers in its designated service area through use of the T-Mobile
15 wireless network. StandUP Wireless offers a variety of rate plans that include
16 minutes of use for, among other things, local service, and all rate plans meet the
17 FCC’s voice or broadband minimum service standards set forth in 47 C.F.R. §
18 54.408. StandUP Wireless also provides access to emergency services provided
19 by local government or public safety officials, including 911 and E911, where
20 available, for free and without regard to whether a customer’s service is active or
21 has available airtime. Like most wireless providers, StandUP Wireless does not
22 differentiate domestic long-distance usage from local usage, and all usage is paid
23 for in advance; thus, toll limitation is unnecessary (per FCC rules, ETCs are not

1 required to offer toll limitation service to low-income consumers if the Lifeline
2 offering provides a set amount of minutes that do not distinguish between toll and
3 non-toll calls).

4 **Q: DOES STANDUP WIRELESS' LIFELINE OFFERING QUALIFY FOR**
5 **UUSF SUPPORT?**

6 **A:** I understand that per Commission rules, in Utah Administrative Code R746-8-
7 403, Lifeline support of \$3.50 per Lifeline subscriber per month is available for
8 subscription to a service that, for wireless Lifeline, meets FCC broadband
9 Lifeline requirements as set forth in 47 C.F.R. 54.408 and allows, at no charge
10 beyond the basic monthly fee, unlimited texting and at least 750 voice minutes
11 per month. StandUP Wireless' proposed UUSF enhanced offering, as described
12 earlier in my testimony and in the UUSF Petition, clearly meets these
13 requirements. Stand Up Wireless understands that its Lifeline Voice Plan does
14 not meet the requirements for Utah USF support. The Company would only seek
15 Utah USF support for customers on the Utah Enhanced Offering, or who had
16 upgraded to a discounted rate plan in the respective month (all discounted rate
17 plans meet the Utah USF requirements). Commission rules further provide that
18 ETCs will be eligible for ongoing UUSF distribution if the company is an
19 ongoing participant in a Commission-approved Lifeline program (which StandUP
20 Wireless is) if the Commission finds it is in the public interest.

21 **Q: HOW WILL STANDUP WIRELESS' PARTICIPATION IN THE UUSF**
22 **SERVE THE PUBLIC INTEREST?**

23 **A:** Approving StandUP Wireless' request to participate in the UUSF will further the

1 Commission's universal service goals to the benefit of Lifeline-eligible
2 consumers by enabling StandUP Wireless to provide an enhanced Lifeline
3 offering, to its existing Utah Lifeline subscribers as well as to eligible subscribers
4 yet to enroll. Specifically, more than 800 current StandUP Wireless customers in
5 Utah would immediately receive 300 more voice minutes each month—from 500
6 to 800 minutes, with unlimited text and 2 GB data. Further, new customers would
7 have access to a plan with 2 GB data without a monthly net cost; without Utah
8 USF support, new customers only have access to the Voice Plan if they need a plan
9 with no net cost, and would pay \$10.00 to access a discounted retail plan with
10 unlimited talk, text, and 2 GB data (1 GB high speed, 1 GB throttled to 3G).

11 As noted in the UUSF Petition, existing data clearly demonstrates the
12 large and growing demand by low-income Utah households for wireless Lifeline
13 services. Additional airtime provided because of participation in the UUSF will
14 better enable StandUP Wireless to assist such Lifeline customers in obtaining
15 calling capacity sufficient to meet all their telecommunications needs and/or
16 sufficient mobile broadband usage. Such customers will have more minutes to
17 contact (or be contacted by), for example, current and prospective employers,
18 health care providers, or government services, and to remain in contact with
19 family members and friends, and/or access to additional mobile data to send and
20 receive email, apply for jobs, or otherwise access the internet.

21 The public interest benefits to low-income Utah consumers of StandUP
22 Wireless' service include larger local calling areas (as compared to traditional
23 wireline carriers); the convenience, portability and security afforded by mobile

1 service; a generous amount of voice and broadband access included without cost
2 (after application of available Lifeline and Utah USF support); the opportunity for
3 customers to receive service without going through a credit check or deposit
4 requirement, or committing to a long-term service contract; and access to 911 and
5 E911 (where available) service in accordance with current FCC requirements.
6 Providing StandUP Wireless with the authority necessary to seek reimbursement
7 for its Lifeline services from the UUSF will only further the public interest
8 already served by StandUP Wireless' existing offerings by allowing the Company
9 to provide a greater quantity of units of no-cost or discounted Lifeline services.

10 **Q: DOES STANDUP WIRELESS AGREE TO COMPLY WITH**
11 **COMMISSION RULES REGARDING ETCS APPROVED TO RECEIVE**
12 **UUSF SUPPORT?**

13 **A:** StandUP Wireless commits to comply with the applicable requirements set forth
14 in Utah Administrative Code R746-8-403 as well as any additional requirements
15 the Commission may deem necessary for UUSF support.

16 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

17 **A:** Yes.

VERIFICATION


VERIFICATION

State of Georgia)

)

County of Gwinnett)

I, Eric Schimpf, hereby depose and state that I am the Chief Operating Officer (COO) of Global Connection Inc. of America d/b/a StandUP Wireless, and declare under penalty of perjury that the foregoing testimony is true and correct to the best of my knowledge and belief.


Eric Schimpf, COO

Subscribed and sworn to before me this 12 day of June 2019.




(Signature of person authorized to administer oath)

My Commission Expires: April 3, 2020

CERTIFICATE OF SERVICE

I CERTIFY that on June 20, 2019, a true and correct copy of the foregoing was served on the following as indicated below:

By Electronic-Mail:

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