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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<b>In the Matter of the Petition of Uintah Basin Electronic Telecommunications, L.L.C. for Designation as an Eligible Telecommunications Carrier in the State of Utah for the Purpose of Offering Lifeline Service on a Wireless Basis</b>	<b>Docket No. 20-2620-01</b>
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**DIRECT TESTIMONY**

**OF**

**KARL SEARLE**

**ON BEHALF OF PETITIONER**

July 15, 2020



22 **Q. Have you reviewed the Company’s Petition for Designation as an Eligible**  
23 **Telecommunications Carrier in the State of Utah for the Purpose of Offering**  
24 **Lifeline Service on a Wireless Basis (“Petition”)?**

25 A. Yes. I have reviewed the Petition and I would like to incorporate the Company’s Petition  
26 into this testimony.

27

28 **Q. What is the purpose of your testimony in this proceeding?**

29 A. The purpose of my testimony is to support the Petition and to demonstrate that the  
30 Company satisfies the requirements of the Utah Public Service Commission  
31 (“Commission”) and the Federal Communications Commission (“FCC”), under the rules  
32 of the FCC and Utah Admin. Code R746-341, *et. seq.*, for designation as a wireless  
33 Eligible Telecommunications Carrier (“ETC”) in the State of Utah within the service area  
34 proposed in the Company’s Petition. I will also demonstrate that the grant of this  
35 designation is in the public interest.

36

37 **Q. Please briefly describe the Company and its operations?**

38 A. Uintah Basin Electronic Telecommunications, L.L.C. is a Utah limited liability company  
39 with its principal office located in Roosevelt, Utah. The Company is a wholly owned  
40 subsidiary of UBTA-UBET Communications Inc. The Company provides high quality  
41 affordable commercial mobile radio services (“CMRS”) to consumers. The Company  
42 initially concentrated on providing these services in the Uintah Basin region of Utah.  
43 However, as its customer base grew, the Company has expanded its scope to all areas in

44 Utah. We also serve areas in Wyoming and Colorado. We provide high quality and  
45 reliable voice calling, text messaging, and mobile and fixed broadband Internet access to  
46 its customers using our own wireless network and facilities. The Company manages all  
47 aspects of the customer experience, including network and facilities operation, service  
48 pricing, handset selection, marketing materials, and live customer service.

49

50 **Q. Can you briefly describe the Lifeline Service you will offer if your Petition is**  
51 **granted?**

52 A. The Company will initially offer an unlimited prepaid Lifeline wireless plan that is  
53 affordable and easy to use making it attractive to low-income and lower volume  
54 consumers. The prepaid Lifeline service will be offered to Lifeline eligible customers at  
55 the rate of \$26.99 per month. For \$26.99 per month the Lifeline wireless customers will  
56 receive unlimited voice minutes, text, and data. Their plan will also include Caller ID,  
57 Call Waiting, Call Forwarding, 3-way Calling, and Voicemail. There will be no  
58 activation fee for Utah Lifeline customer. There will be no additional charge for toll calls.  
59 Calls to 911 are free. Calls to customer service using 611 are free. The Company will  
60 offer a discounted handset that is compliant with the FCC's handset requirements.

61

62 The Company's Lifeline wireless plan will provide customers with access to  
63 emergency services and a reliable means of communication that can be used both at home  
64 and while traveling to remain in touch with family and friends and for contacting  
65 prospective employers, all of which are critical in this time of global pandemic.

66

67 **Q. How will your Lifeline services be different from other carriers' offerings?**

68 A. Customers will receive unlimited voice minutes, text, and data. The service will be  
69 prepaid each month and will not require any credit checks, or contracts. The customers  
70 can cancel their service at any time, and because the service is prepaid, there will never  
71 be any hidden charges.

72

73 **Q. What data speeds are you offering for your Lifeline plan?**

74 A. All local data speeds will be capped at 10 Mbps and reduced to 1.5 Mbps upon reaching  
75 10 GB of data usage within a single billing period. All roaming data speeds will be  
76 restricted to 1.5 Mbps and reduced to 512 Kbps upon reaching 5 GB of data usage within  
77 a single billing period.

78

79 **Q. What is the billing period?**

80 A. Our Lifeline plan is \$26.99 per month, so the billing period is a month.

81

82 **Q. Are there any other terms and conditions associated with the Company's Lifeline  
83 service plan?**

84 A. Yes. The Company's Terms and Conditions and the Company's Managed Network  
85 Practices will apply to the Lifeline service plan.

86

- <https://www.stratanetworks.com/images/Legal/Terms-and-Conditions.pdf>

87

- [https://www.stratanetworks.com/images/Legal/Broadband\\_Internet\\_Disclosure.pdf](https://www.stratanetworks.com/images/Legal/Broadband_Internet_Disclosure.pdf)

88

89 **Q. What relief does the Company seek in its Petition?**

90 A. The Company seeks designation as an ETC in the State of Utah for purposes of receiving  
91 federal and state universal service Lifeline support.

92

93 **Q. Please describe the Company's proposed service are for ETC designation?**

94 A. The Company seeks designation as an ETC statewide, subject to the existence of its  
95 facilities and the facilities of its underlying carriers with whom the Company has robust  
96 roaming agreements ("Company Service Territory"). The Rate Centers of the proposed  
97 Company Service Territory were identified in Exhibit 1 to the Petition and are  
98 incorporated herein by reference.

99

100 **Q. Does your proposed Company Service Territory overlap with rural carriers in**  
101 **Utah?**

102 A. Yes, in some instances. But the proposed Company Service Territory is consistent with  
103 previous Commission precedence, and the public interest since the Company seeks ETC  
104 designation solely to utilize state and federal universal service funding to provide Lifeline  
105 services to low-income consumers.

106 **Q. What are the requirements for designation as an ETC pursuant to federal and Utah**  
107 **law?**

108 A. The requirements for ETC designation are contained in Section 214 of the  
109 Communications Act of 1934 (the "Act") and 47 CFR 54.202. Specifically an applicant

110 must: (i) be a common carrier that (ii) offer services that are supported by Federal  
111 Universal Service Support mechanisms either through its own facilities, or a combination  
112 of its own facilities and resale of another carrier’s services; (iii) advertise the availability  
113 of such services is eligible for designation as an ETC; (iv) make Lifeline service available  
114 to qualifying low income consumers; (v) comply with service requirements; (vi) remain  
115 functional in emergency situations; (vii) satisfy consumer protection and service quality  
116 standards; (viii) be financially and technically qualified; (ix) take steps to protect against  
117 fraud, waste and abuse of the federal USF; (x) comply with FCC requirements on  
118 Lifeline certification and verification; and (xi) comply with FCC requirements for  
119 deposits, fees and reports.

120 Additionally, section 214(e)(2) of the Act provides that in the case of an area  
121 served by a rural telephone company, before designating an additional ETC, the state  
122 Commission must find that the designation is in the public interest.

123

124 **Q. Let’s go through the federal requirements for designation as an ETC. Is the**  
125 **Company a common carrier?**

126 A. Yes. The Company is a common carrier as defined by 47 U.S.C. §153(10) which stated  
127 that a “common carrier” means any person engaged as a common carrier for hire, in  
128 interstate or foreign communication by wire or radio or interstate or foreign radio  
129 transmission of energy...” The Company provides CMRS within the Company Service  
130 Territory. The Company’s CMRS is provided over facilities owned by the Company and  
131 includes roaming on facilities of other rural and national carriers. Additionally, federal

132 statutes provide, and the FCC has determined that CMRS providers are treated as  
133 common carriers for regulatory purposes.

134

135 **Q. Are the services that the Company provides supported by Federal universal service**  
136 **support?**

137 A. Yes. The services eligible for federal universal service support are: (1) voice grade  
138 access to the public switched network or its functional equivalent; (2) minutes of use for  
139 local service provided at no additional charge to end-user; and (3) access to emergency  
140 services provided by local government or other public safety organization, such as 911  
141 and enhanced 911, to the extent the local government in an eligible carrier's service area  
142 has implemented 911 or E911 systems. While toll limitation for qualifying low-income  
143 consumers was previously a supported service, the FCC eliminated toll limitation as a  
144 supported service in its Lifeline Reform Order. Eligible broadband services must provide  
145 the capability to transmit data to and receive data by wire or radio from all or  
146 substantially all Internet endpoints.

147

148 **Q. Does the Company provide those supported services?**

149 A. Yes. The Company offers each of those services in Utah utilizing its own facilities,  
150 including its own cellular and personal communications services, antennas, towers, and  
151 mobile switching offices, and by utilizing facilities owned by other rural and national  
152 carriers through contractual arrangements:

153 1. Voice Grade Access to the Public Switched Network. The Company provides  
154 voice grade access to the public switched network through its network facilities.

155 2. Minutes of Use for Local Service. As part of the voice grade access to the  
156 public switched network, an ETC must provide local usage to its customers. Local usage  
157 means an amount of minutes of use of exchange service, prescribed by the Commission,  
158 provided free of charge to end users. The Company's proposed lifeline plan offers  
159 unlimited nationwide voice calling at no additional cost to the customer beyond the  
160 monthly service charge.

161 3. Access to 911 and E911 Emergency Service. The Company provides 911 and  
162 E911 access for all its customers to the extent local government in its service area has  
163 implemented 911 or E911 systems. The Company complies with the FCC requirements  
164 governing the deployment and availability of E911 handsets. Calls to 911 emergency  
165 services will always be free and will be available regardless of service activation or  
166 availability of minutes. Additionally, the Company has the ability to remain functional in  
167 emergency situations, including access to back up power, rerouting of traffic around  
168 damaged facilities, and managing traffic spikes resulting from emergencies.

169 4. Broadband Services. The Company will provide its Lifeline customers with  
170 broadband access that has the capability to transmit data to and receive data from all or  
171 substantially all of the Internet endpoints. The Company's unlimited data plan meets and  
172 exceeds the FCC's minimum broadband data offerings. Also, the speeds offered by the  
173 Company meet or exceed the speeds required by the FCC.

174 **Q. As broadband speed requirements are increased, will the Company continue to meet**  
175 **the FCC requirements?**

176 A. Yes.

177

178 **Q. Federal law requires ETCs to advertise the availability of supported services. How**  
179 **will you fulfill that obligation?**

180 A. The Company currently offers and advertises its wireless services to both residential and  
181 business customers in Duchesne, Uintah, Daggett, and Wasatch Counties, Utah using  
182 media of general distribution such as billboards, radio, newspapers, television, direct  
183 mailings, and Internet advertising. The Company also has a website that provides  
184 information regarding the wireless services available at the Company. Upon designation  
185 as an ETC, the Company will continue to broadly advertise the availability and rates for  
186 the services described above using media of general distribution as required by federal law.

187 We want customers who are qualified for the Lifeline program to use our services,  
188 so we will expand our advertising efforts if needed to ensure that Lifeline-eligible  
189 customers are aware of the service offerings. We anticipate using outreach and community  
190 events and working with charitable and non-profit organizations as a means of reaching  
191 low-income customers.

192

193 **Q. Are you aware that the FCC has revised rules regarding information that must be**  
194 **included in marketing materials?**

195 A. Yes. The Company's marketing materials will state, in easily understood language, that:  
196 (1) the service is a Lifeline service; (2) Lifeline is a government assistance program; (3)  
197 the service is non-transferable; (4) only eligible consumers may enroll in the program; (5)  
198 documentation is required for enrollment and on-going eligibility; (6) the program is  
199 limited to one discount per household; and (7) the Company is the provider of the service,  
200 in compliance with FCC rules. An example of our advertising for the Company's Lifeline  
201 service offering was attached as Exhibit 3 to our Petition and is incorporated herein by  
202 reference.

203 **Q. Will you make the Lifeline service available to qualifying low-income customers?**

204 A. Absolutely. Immediately upon designation as an ETC, the Company will make its  
205 Lifeline service plan available to low-income customer in the Company Service Territory.  
206

207 **Q. Will the Company comply with the service requirements applicable to the support it**  
208 **receives?**

209 A. Yes. The Company provides telecommunications services to all its customers within the  
210 Company Service Territory by utilizing its own facilities, including its own cellular and  
211 PCS antennas, towers and mobile switching offices, and roaming on facilities of other  
212 rural and national carriers pursuant to robust roaming agreements. The Company  
213 currently holds the licenses for radio service identified in Exhibit 2 to the Petition, which  
214 is incorporated herein by reference. I am authorized to certify that the Company will  
215 comply with the service requirements applicable to the support it receives consistent with  
216 47 CFR §54.202(a)(1)(i).

217

218 **Q. Is the Company an ETC in any other states?**

219 A. Yes. The Company was granted ETC status in Wyoming in 2013; and Colorado in 2013.

220

221 **Q. How will the Company remain functional in an emergency situation?**

222 A. The Company will be able to remain functional in an emergency situation in its service  
223 territory because its network is designed with sufficient battery back-up power and  
224 utilization of generators to ensure functionality if its primary or external power supply is  
225 unavailable. In addition, the Company maintains 3 portable generators that can be moved  
226 to cell sites as needed. Additionally, the Company's switch connectivity to the public  
227 switched network is based on redundant rings enabling traffic to continue if a particular  
228 route is damaged.

229

230 **Q. How will the Company satisfy applicable consumer protection and service quality**  
231 **standards?**

232 A. To demonstrate its commitment to high service quality, the Company commits to comply  
233 with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer  
234 Code for Wireless Service and the applicable Utah rules on consumer protection and  
235 service quality. Additionally, the Company's customers will be able to call customer  
236 service by dialing 611 from their Company handset and no minutes will be used or  
237 documented for the call.

238 **Q. Is the Company financially and technically capable of providing Lifeline services in**  
239 **compliance with FCC Rules.**

240 A. Yes. The FCC rules require ETC petitioners to demonstrate financial and technical  
241 capability to comply with the FCC's Lifeline service requirements. The factors to be  
242 considered are: (1) a carrier's prior offering of service to non-Lifeline subscribers; (2) the  
243 length of time the carrier has been in business; (3) whether the carrier relies exclusively on  
244 Lifeline reimbursement to operate; (4) whether the carrier receives revenues from other  
245 sources; and (5) whether the carrier has been subject to enforcement action or ETC  
246 revocation proceedings in any state.

247 The Company has provided CMRS to customers since 1989 without any Lifeline  
248 support. Historically, the Company has relied, and will continue to rely, on revenues  
249 generated from non-Lifeline customers to support its business. The Company has not, and  
250 will not, rely solely on Lifeline reimbursement to operate. Rather, being certified as an  
251 ETC will merely allow the Company to offer low-income customers a local choice for  
252 reliable mobile service, thereby increasing its customer base.

253 The Company management team has substantial experience in both wireless and  
254 wireline networks and through an affiliated incumbent local exchange carrier, has been  
255 providing wireline service for over 65 years (including Lifeline service). The Company's  
256 management team is very familiar with the Lifeline service requirements, the National  
257 Verifier Lifeline enrollment and eligibility requirements, as well as the procedures for de-  
258 enrollment. Neither the Company, nor its affiliated incumbent local exchange carrier has

259           been subject to a Lifeline enforcement action or an ETC revocation in any state.

260

261   **Q.    How will the Company protect against fraud, waste, and abuse?**

262   A.    The Company will take all steps necessary to prevent fraud, waste and abuse, and will  
263       comply with all applicable Lifeline requirements adopted by the FCC for purposes of  
264       preventing fraud, waste and abuse, including the enrollment procedures and de-enrollment  
265       procedures outlined by the FCC in 47 C.F.R. §54.401 through §54.422.

266

267   **Q.    How will the Company comply with the subscriber eligibility determination and  
268       certification?**

269   A.    The Company shall utilize the National Verifier consistent with USAC’s policies and  
270       procedures. The Company’ management team has extensive experience with the Lifeline  
271       National Verifier and eligibility and certification rules.

272

273   **Q.    How will the Company comply with the FCC rules on deposits, fees, and reports?**

274   A.    The Company does not offer any wireless Lifeline plan that charges additional fees for  
275       toll calls. In compliance with 47 C.F.R. Section 401(c), the Company will not collect a  
276       deposit in order to initiate service for its Lifeline service plan. Additionally, in

277 compliance with 47 C.F.R. § 401(e) the Company will not charge Lifeline customer a  
278 monthly number-portability charge. The Company will comply with the FCC’s annual  
279 reporting requirements for ETCs as set forth in 47 C.F.R. § 54.422.  
280

281 **Q. Are you familiar with the State requirements for receiving State Lifeline support**  
282 **from the Utah Public Telecommunications Service Support Fund (“UUSF”)?**

283 A. Yes. The Commission has adopted requirements for Lifeline support which are outlined  
284 in Utah Admin Code R746-8-403. The Commission’s rules provide that state Lifeline  
285 support may not exceed \$3.50 per Lifeline subscriber per month of subscription to a  
286 service that meets FCC broadband requirements as set forth in 47 C.F.R. 54.408; and for  
287 wireless Lifeline, allows, at no charge beyond the basic monthly fee, unlimited texting  
288 and at least 1000 voice minutes per month. The rules also state that the ETC will be  
289 eligible for ongoing Lifeline distribution if the company is an ongoing participant in an  
290 approved Lifeline program and if the Commission finds it is in the public interest.  
291

292 **Q. Will the Company’s Lifeline services meet those requirements?**

293 A. Yes. The Company’s Lifeline offering will include unlimited voice services, texting, and  
294 data to access wireless broadband internet service. The Company proposed offering  
295 plainly meets (and exceeds) the requirements as outlined by the Commission to be  
296 eligible for UUSF Lifeline support. The Company’s offering also complies with the  
297 minimum FCC service standards and will enable Lifeline customers to receive the full  
298 value of their Lifeline subsidy. Additionally, the Company is willing to comply with all

299 the rules and regulations that the Commission may lawfully impose upon the Company's  
300 provision of service contemplated by this Petition.

301

302 **Q. Federal law requires that the Commission find that designation of more than one**  
303 **ETC in an area served by a rural telephone company is in the public interest. Do**  
304 **you believe designation of the Company as an ETC will serve the public interest?**

305 A. Yes. Designation of the Company as an ETC statewide is in the public interest. Since 2009,  
306 at least 17 wireless carriers have been approved for ETC status in the State of Utah for the  
307 provision of wireless Lifeline in the State. In each of these applications the Commission  
308 has found that designation of the wireless company as an ETC in the state for purpose of  
309 providing Lifeline service is in the public interest. Additionally, since the statutory change  
310 in 2017 that allows wireless ETCs to be eligible for State Lifeline support, the Commission  
311 has approved at least seven (7) applications seeking amendment of the ETCs' designation  
312 as an ETC to allow participating in the UUSF for Lifeline purposes (the Applications of  
313 Sage Telecom Communications, LLC (TruConnect) and the Company are pending).

314 Designation of the Company as an ETC in the Company Service Territory will  
315 further the public interest by providing Lifeline eligible customers an excellent unlimited  
316 service offering at a lower price. Designation of the Company as an ETC will enable the  
317 Company to offer a Lifeline service plan from a local company in the Company Service  
318 Territory that is affordable for low-income consumers. Additionally, low-income  
319 customers may work in migratory jobs and may move between residences more frequently.  
320 The Company's wireless Lifeline service offering will ensure the availability of quality,

321 reliable voice, texting and data service, access to emergency services, and access to job  
322 resources, even when a customer is between homes and/or jobs. The Company's Lifeline  
323 service offering does not have any hidden costs, unexpectedly high monthly charges, or  
324 long-term service contracts. All-distance domestic calling is included in the Company's  
325 Lifeline service offering so there are no burdensome long-distance calling charges.  
326 Because our Lifeline plan is unlimited, the customers will not need to purchase additional  
327 minutes or additional data if their consumption is high in a particular month. This means  
328 the customers' service will always be available to them at no additional cost.

329

330 **Q. What about the impact that designation of the Company as an ETC may have on the**  
331 **UUSF?**

332 A. Designating the Company as an ETC and allowing it to receive reimbursement from the  
333 UUSF for state Lifeline will not have a negative impact on the UUSF. In the case of Lifeline  
334 support, an ETC only receives Lifeline support for the customers it obtains. Therefore, if  
335 the Company' offerings do not provide consumer benefits, then customers will not elect  
336 Lifeline service from the Company and the Company will receive no support from the  
337 UUSF. In that case, no consumer or party is harmed and the UUSF is not impacted. On  
338 the contrary, if customers do choose the Company' wireless Lifeline service, there will be  
339 an impact to the UUSF, but other competitors will likely respond by improving their service  
340 offerings in order to retain or attract customers, and ultimately customers will benefit.  
341 Further, to the extent the Company "wins" the customer from another Lifeline provider,

342 the net result to the UUSF is the same. To the extent new customers avail themselves of  
343 the Company's Lifeline plan, the public policy goal of providing universal service is  
344 furthered.

345

346 **Q. Will the Company comply with all other FCC and Commission Rules application to**  
347 **ETC operations in Utah?**

348 A. Yes. The Company will comply with the rules and regulations of the FCC and of this  
349 Commission with respect to provision of Lifeline services in Utah, except as may be  
350 waived by the Commission.

351

352 **Q. Will the Company timely pay all applicable federal, state, and local regulatory fees**  
353 **and assessments applicable to its ETC operations in Utah?**

354 A. Yes. The Company acknowledges and accepts its obligations with respect to payment of  
355 federal, state, and local regulatory fees, taxes, and assessments, including, but not limited  
356 to, universal service fees (subject to Utah Code Admin. R746-8-403), emergency  
357 services, and relay services.

358

359 **Q. When will the Company be ready to offer Lifeline services in Utah?**

360 A. The Company is providing wireless service currently and has been for years, so the  
361 Company will be ready to offer Lifeline services as soon the Commission grants the  
362 Company ETC designation.

363

364 **Q. Will you maintain a Utah-specific fact sheet that provides customers concise and**  
365 **complete information about the Lifeline services they will receive?**

366 A. Yes. A copy of the Company's proposed fact sheet is attached hereto as 20-2620-01  
367 Exhibit A - Direct Testimony of Karl Searle – Strata Fact Sheet. The Company will  
368 provide the fact sheet to prospective new customers, each new customer at the time of  
369 enrollment, and to existing customer upon request. The Company will also make the fact  
370 sheet publicly available for download by posting it on the Company's website:  
371 [www.stratanetworks.com](http://www.stratanetworks.com). The Company will update the fact sheet if it changes its  
372 Lifeline service plan.

373

374 **Q. Does this conclude your testimony?**

375 A. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that on the 13<sup>th</sup> day of July, 2020, I served a true and correct copy of the Direct Testimony of Karl Searle in Docket 20-2618-01, In the Matter of the Petition of Uintah Basin Electronic Telecommunications, L.L.C. for Designation as an Eligible Telecommunications Carrier in the State of Utah for the Purpose of Offering Lifeline Service on a Wireless Basis, via e-mail transmission to following persons at the e-mail addresses listed below:

Division of Public Utilities

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/s/Kira M. Slawson

EXHIBIT A  
TO DIRECT TESTIMONY OF KARL SEARLE  
STRATA FACT SHEET

## IMPORTANT INFORMATION ABOUT YOUR STRATA NETWORKS WIRELESS LIFELINE SERVICE

STRATA Networks Lifeline Service is brought to you by STRATA Networks, which is a dba of Uintah Basin Electronic Telecommunications, L.L.C. This service includes the provision of a discounted E911 compliant wireless handset. This government sponsored Lifeline telephone service is subject to continuing eligibility and annual recertification. Only one Lifeline subsidy per household is allowed; your participation in this program requires that you do not receive Lifeline subsidy on any other phone, either wireless or wireline. A household, for purposes of the Lifeline program, is defined as any individual or group of individuals who live together at the same address and share income and expenses. If you no longer receive the low-income assistance or your income exceeds the qualifying amount, you must notify STRATA Networks. As a recipient of Lifeline service, you may not give away or sell this phone, nor transfer your service to any other individual.

- Your enrollment in the program will be for 12 months (unless your eligibility status changes, you select a different carrier, or there is no activity on your phone for (30) consecutive days).
- You will receive unlimited talk, unlimited text messaging, and unlimited data for each 30-day period. Data speeds may be restricted to 3G/1x speeds if more than 5 GB of data usage occurs in a 30-day period.
- To contact STRATA Networks customer service, please call (435)622-5007 or you may visit [www.stratanetworks.com](http://www.stratanetworks.com) and chat with a live customer service representative.
- Emergency calls to 911 can be made even if you have no balance remaining on your account.
- Before the end of 12 months the National Verifier will verify your continued eligibility for Lifeline support. If your continued eligibility for Lifeline support cannot be determined by accessing the appropriate eligibility or income databases, the National Verifier may request a signed certification from you verifying that you are still eligible for Lifeline support to continue to receive your discounted service.

YOU ARE ENCOURAGED TO READ YOUR WELCOME KIT CAREFULLY FOR COMPLETE DETAILS REGARDING YOUR STRATA NETWORKS LIFELINE SERVICE.