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Supplement to Application of Telrite Corporation d/b/a Life Wireless

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Circular 230: As a result of certain perceived abuses, the Treasury Department has promulgated regulations that require all attorneys and accountants who provide certain written communications to a client to include an extensive analysis and disclosure in such written communications. To comply with our obligations under these regulations, we wish to inform you that this communication does not contain all of such analysis and disclosure and was not written or intended by us to be used, and may not be used, by any taxpayer for the purpose of avoiding any tax penalty that may be imposed on the taxpayer. In addition, any tax advice contained in this communication may not be used to promote, market or recommend a transaction.

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May 7, 2013

Via FedEx and Facsimile 614-466-0313

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

Re: Telrite Corporation d/b/a Life Wireless; Docket No. 13-0173-TP-UNC

To Whom It May Concern:

Enclosed herewith for filing is the Supplement to Application of Telrite Corporation d/b/a Life Wireless seeking designation as a wireless ETC provider in the State of Ohio. Please acknowledge receipt of this facsimile filing via sboyd@joneswalker.com.

The original and four (4) copies are being delivered via FedEx for delivery on the next business day, Wednesday, May 8, 2013.

Please contact me should you need additional information regarding this filing.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andy Gipson".

J. Andrew Gipson

JAG/ssb

Enclosures

cc: Brian Lisle
Michelle Green (via email)

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JONES WALKER LLP

ALABAMA * ARIZONA * CALIFORNIA * DISTRICT OF COLUMBIA * FLORIDA * GEORGIA * LOUISIANA * MISSISSIPPI * NEW YORK * TEXAS

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Telrite)	Case No. 13-0173-TP-UNC
Corporation d/b/a Life Wireless for)	
Designation as a Low-Income Competitive)	
Eligible Telecommunications Carrier)	

On January 10, 2013, Telrite Corporation d/b/a Life Wireless ("Life Wireless") filed an application for designation as a Low Income Competitive Eligible Telecommunications Carrier. This application was designated as Case No. 13-0173-TP-UNC. Attached to the Supplemental Application Forms for Competitive Eligible Telecommunications Carrier ("CTEC") designation low-income universal service were exhibits A-H. During the pendency of this Application, the Staff has submitted a data request to the Applicant. As requested by Staff, this Supplement to Application was prepared to provide additional detail that was not in the original application. This will allow the Commission to have additional information with which to render a decision. This additional detail is set forth in several categories below.

GENERAL

A. Financial Information.

Life Wireless has provided current confidential financial statements to the Commission Staff.

B. Complaints and Investigations.

Life Wireless has not been subject to an audit from USAC regarding compliance issues, nor has the Company been audited by other state utility commission regarding its use of universal service funds. Presently, Life Wireless does not have any outstanding complaints or investigations at any state utility commission or USAC; however Life Wireless has participated

in resolving certain complaints and investigations before the FCC and provided confidential information to the Staff to this effect.

C. Ohio Telecommunications Relay Service ("TRS").

Life Wireless is aware that it must pay the Ohio TRS. Once the order is published designating Life Wireless as an Eligible Telecommunications Carrier ("ETC"), Life Wireless will need thirty (30) days to capture data for TRS Reporting.

D. Ohio Customers.

Life Wireless does not currently operate/offer service to customers in Ohio. Upon designation as an ETC, Telrite will provide service to Lifeline Customers as well as non-Lifeline customers. Non-Lifeline customers will have the opportunity to purchase prepaid plan offerings identical to Lifeline plan at a cost of \$12.75 per month for basic service. In order the differentiate between its Lifeline and non-Lifeline customers, Life Wireless will maintain separate books and records for Lifeline and non-Lifeline customers.

E. Life Wireless Call Centers and/or Retail Outlet Locations.

Life Wireless' customer call centers are located at 1480 Terrell Mill Road, Suite 104, Marietta, GA 30067. Any overflow would be proceeds through ILD Corporation/Outsource Services located at 8401 Datapoint, Suite 1000, San Antonio, TX 78229. Life Wireless' business plan does not currently include retail locations in the State of Ohio.

F. Interconnection Agreements.

Life Wireless, in its capacity as a wireless carrier, does have a wireless resale agreement with its underlying provider, AT&T Wireless. As such, Life Wireless offers services in the same coverage areas as AT&T Wireless. As a wireless carrier, Life Wireless does not have

interconnection agreements with other carriers requiring approval of the Ohio Commission. Life Wireless does not anticipate seeking any additional wireless resale agreements at this time.

G. Handsets.

1. Life Wireless will offer both new and refurbished handsets to Life Wireless customers, with eighty percent (80%) of all handsets the Company distributes being in new condition. Existing customers can upgrade their phone at any time to a full QWERTY phone with a battery, charger and headphones by contacting Customer Service and paying an upgrade fee of \$35.00. New customers who are activating their service through a field agent can pay an upgrade fee of \$20.00 at the time of activation and receive the same phone and accessories. Upgraded phones will always be new equipment under warranty.

2. Life Wireless will replace a defective or malfunctioning phone with a new or refurbished handset once the customer returns the phone and the phone is inspected and deemed defective or malfunctioning at Life Wireless' discretion. Customers must return phones for inspection and determination within thirty (30) day of activation. If a Life Wireless customers decides to return a handset, the customer will have to do so at their own expense; however, should Life Wireless determine that the handset is defective, the company will send a replacement handset along with a 2 week Unlimited Talk/Text Card.

3. Within thirty (30) days of activation, handsets must be mailed back to us to determine if damaged by customer or defective. If damaged by customer, a log will be placed on the account to notify Life Wireless and the customer that the \$20.00 fee for a replacement phone is required before a new handset can be shipped to the customer.

Thirty one (31) days and after activation for as long as the customer account remains active, Life Wireless will issue a free replacement phone per the following guidelines: (a) the

customer must mail the defective/damaged phone to Life Wireless. If the phone is determined to be defective, Life Wireless will ship out a replacement phone free of charge along with a recharge pin, which allows a customer 14 days of unlimited talk and text; (b) If the phone is determined to be damaged, Life Wireless will notate on the customer's account that it must secure payment of \$20.00 before shipping out a replacement phone.

4. Lost or Stolen phones handsets can be replaced at a cost of \$20.00 to the customer.

5. Any unlocked GSM handset would be compatible with Life Wireless' network; however Life Wireless cannot assist in unlocking customer phones.

6. Life Wireless handsets are capable of placing international calls; however should a customer choose to do so international calls can be blocked at no additional cost to the customer.

7. All customers can initialize voicemail service immediately following activation. If a subscriber fails to initiate their voicemail at the time of service, it will be deactivated within twenty four (24) hours. However, a subscriber can reactivate his voicemail service, free of charge, at any time after service is activated by dialing customer service.

H. Fees.

1. Life Wireless does not charge any type of monthly access or maintenance fee to its Lifeline customers. Nor does Life Wireless charge any processing fees, order fees, change fees, or any type of fee applicable to a Lifeline pre-paid wireless customers, including a re-enrollment fee for a Lifeline customer terminated because of ineligibility who later becomes eligible and reapplies. Additionally, there is no fee associated with termination.

2. Because Life Wireless is a prepaid service provider, the customers are not required to make monthly payments to maintain service.

I. Terms and Conditions.

At the request of the Commission Staff, Life Wireless has revised its Terms and Conditions to clarify the following:

1. Life Wireless agrees not to impose any activation fee or any other monthly service charge in connection with its Lifeline service offerings.

2. Customers may contact the Commission regarding any disputes/complaints at the following address:

Public Utilities Commission of Ohio
Attn: IAD
180 East Broad Street
Columbus, Ohio 43215
800-686-7826 or 800-868-1579 for TTY-TDD
puc.ohio.gov 8am – 5pm EST

3. Life Wireless may change its terms, conditions, rates, fees, expenses, or charges for other service at any time. The Company will provide the customer with a fifteen (15) day or more notice of such changes...

J. Calling Plans, Minutes, and Payments.

There are no fees associates with Lifeline customers switching rate plans. Customers can immediately change their rate plan after activation by contacting Customer Service.

There is no limit to the number of times an eligible Lifeline customer can switch rate plans nor is there any time period restriction.

There are no fees that a Lifeline customer on either the 125 minute or 250 minute plans would need to pay. The Lifeline discount for both of these plans is \$12.75 which is equal to the \$9.25 federal lifeline subsidy, plus a \$3.50 company credit.

For customers who utilize "top-up" minutes, the Unlimited minutes will be used first versus the free minute. All purchased minutes are used prior to program minutes. Life Wireless has developed a process which upon PIN redemption all available program minutes are "banked" or otherwise set aside for use after purchased minutes have expired or been exhausted. Once the Unlimited time period expires, the free minutes will continue to be used.

K. Eligibility Verification Compliance Plan.

1. Address validation and dupe check is performed at the time of voice sign-up by having the Customer Service Representative ("CSR") enter the prospects data. The CSR can then mail the completed form to the prospect for execution and return. The prospect must then fax or mail back proof of eligibility, a copy of the state issued ID and a fully executed self-certification form. Once all required data has been received, reviewed and verified by a Life Wireless employee, the phone is shipped.

2. There are no identity verification steps as part of the handset activation process. The customer calls "770" activation line, listens to a short recorded message, and the process is complete. The customer has passed all eligibility requirement and identity validation prior to receiving a handset to activate.

3. If a customer is no longer enrolled in a Lifeline eligible program, they will lose their eligibility and their account is switched to a non-Lifeline supported account.

L. Ohio Application and Certification Form.

The Lifeline Program Application has been revised to include Ohio specific programs and meet the requirements of 4901: 1-6-19 and is attached as **Exhibit "A."**

M. Customer Balance.

1. Balance detail may be obtained by dialing 611, a free call, and selecting the appropriate IVR menu selection or by opting out to customer service. Detail is also available by dialing *777# from the customer handset. In all instances the customer is never charged for obtaining balance detail.

2. When Lifeline customers reach 25 minutes or less of available time, a pre-call low balance message is played daily to the customers. The message only plays if the customer uses the phone to place a call. There is no charge for playing the message, only for using the phone.

3. All calls to 411 are deducted from the customer's available program minutes.

4. Blocking is available for 900/976 numbers. There is no charge for this service.

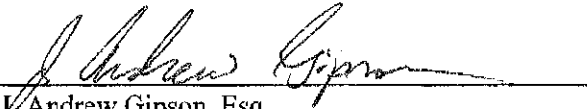
N. Customer Service.

Lifeline customers may contact Customer Service free of charge by dialing 611 from their Life Wireless handset or by dialing the toll free number from any landline phone. Customers may also send email requests to customer service, also free of charge. Life Wireless customer service is available for both English and Spanish speaking customers.

O. Customer to Customer Calling.

When Life Wireless customers call other Life Wireless customers minutes of use are deducted regardless of the number dialed, excluding 611 and 911. All calls to 611 and 911 are "free." There is no monetary charges or minute deductions for 611 and 911 calls.

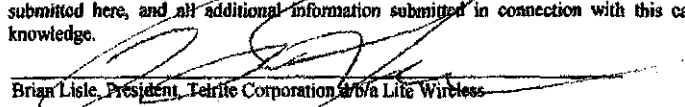
Respectfully submitted,



J. Andrew Gipson, Esq.
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Jackson, Mississippi 39201
Telephone: (601) 949-4789
Facsimile: (601) 949-4804
Attorney for Telrite Corporation

VERIFICATION

I, Brian Lisle, verify that I have utilized the Supplemental Application for Petition for Designation as a Competitive Eligible Telecommunications Carrier for Low-Income Universal Service provided by the Commission and that all of the information submitted here, and all additional information submitted in connection with this case, is true and correct to the best of my knowledge.


Brian Lisle, President, Tairite Corporation d/b/a Life Wireless

(Date) May 3, 2013

**Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*