

Lance J.M. Steinhart, P.C.

Attorneys At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
Email: lsteinhart@telecomcounsel.com

Telephone: (770) 232-9200
Facsimile: (770) 232-9208

August 29, 2018

VIA ELECTRONIC DELIVERY

Office of Administration
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, OH 43215-3793
(614) 466-3016

Re: **In the Matter of Petition of AT&T Ohio Seeking to Relinquish its Eligible
Telecommunications Carrier Designation in a Portion of its Service Area;
Case No. 17-1948-TP-UNC**

Dear Madam/Sir:

Enclosed for filing in the above-referenced docket, please find the Comments of i-wireless, LLC ("i-wireless" or the "Company") in Response to the Commission's June 28, 2018 Notice for Comments concerning The Ohio Bell Telephone Company dba AT&T Ohio's ("AT&T Ohio") Relinquishment of its eligible telecommunications carrier ("ETC") designation in portions of its service area in the State of Ohio.

If you have any questions, or if we may provide you with additional information, please do not hesitate to contact Lance Steinhart at (770) 232-9200 or lsteinhart@telecomcounsel.com. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
E-mail: lsteinhart@telecomcounsel.com

Attorneys for i-wireless, LLC

Enclosures

cc: Sam Bailey

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

**IN THE MATTER OF THE PETITION OF)
AT&T OHIO SEEKING TO RELINQUISH)
ITS ELIGIBLE TELECOMMUNICATIONS)
CARRIER DESIGNATION IN A PORTION)
OF ITS SERVICE TERRITORY)**

Case No. 17-1948-TP-UNC

**COMMENTS OF I-WIRELESS, LLC
IN RESPONSE TO JUNE 28, 2018 NOTICE FOR COMMENT**

i-wireless, LLC (“i-wireless” or the “Company”) files these Comments in response to the Public Utilities Commission of Ohio’s (the “Commission”) June 28, 2018 Notice for Comment, directing i-wireless to submit comments regarding its willingness and ability to ensure that all customers currently served by The Ohio Bell Telephone Company dba AT&T Ohio (“AT&T Ohio”) in its respective service areas will continue to be served with the federal Lifeline discount, if the customer is eligible, in the event that the Commission grants AT&T Ohio’s request to relinquish its eligible telecommunications carrier (“ETC”) designation for purposes of universal service fund support in the majority of its service area in Ohio. The Commission further seeks i-wireless to identify whether such Lifeline service will be provided on a wireline or wireless and facilities or resale basis.

i-wireless was originally granted ETC status by the Commission on November 22, 2011 throughout the service areas approved in Case No. 11-571-TP-UNC. As disclosed in its original application, i-wireless offers Lifeline service primarily through the resale of facilities-based wireless carriers’ services and facilities. It is i-wireless’ intent to continue to make available its wireless Lifeline service with the federal discount to its current subscribers and all qualifying applicants that it is able to serve. However, this Commission is aware that the Federal

Communications Commission (“FCC”) is considering whether to disallow the participation of wireless resellers in the Lifeline program altogether.¹

i-wireless appreciates that this Commission filed comments with the FCC on February 21, 2018 in the pending NPRM to oppose the elimination of support for non-facilities-based Lifeline providers.² As this Commission noted, such action “would...harm the most vulnerable of customers and cause a significant market disruption.”³ i-wireless, through its participation in the National Lifeline Association, has also actively opposed this and other proposals in the NPRM that would greatly harm i-wireless’ ability to continue to provide Lifeline service.⁴

With that in mind, i-wireless intends to continue to offer Lifeline service to qualifying subscribers throughout its service territory in Ohio unless prohibited directly from doing so by the FCC, or unless the FCC imposes regulations that would result in less-direct but equally harmful requirements such as its consideration of a requirement that wireless resellers pass 100% of federal support through to its underlying facilities-based provider. Should anything necessitate a prospective change in i-wireless’ approach to the Ohio Lifeline marketplace, i-wireless will inform the Commission.

¹ See Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, WC Docket Nos. 17-287, 11-42, 09-197, *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking (“NPRM”)*, and Notice of Inquiry, FCC 17-155 (rel. Dec. 1, 2017) (*“Fourth Report and Order”*), §§ 67–73.

² See Comments of The Public Utilities Commission of Ohio, WC Docket No. 17-287 et al. (filed Feb. 21, 2018).

³ *Id.* at 6.

⁴ See Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Feb. 21, 2018); Reply Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Mar. 23, 2018); *Ex Parte* Letter from John J. Heitmann, Counsel to the National Lifeline Association, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 17-287 et al. (filed May 4, 2018).

Based on the foregoing, i-wireless stands ready to offer its wireless Lifeline service options to eligible Lifeline subscribers in Ohio provided that the FCC does not take action to ban or limit the participation of wireless resellers in the Lifeline program.

Please feel free to contact me if you wish to discuss this matter further or have any questions.

Respectfully submitted,

i-wireless, LLC

By: /s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Managing Attorney
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Phone)
(770) 232-9208 (Fax)
lsteinhart@telecomcounsel.com (E-Mail)

Attorneys for i-wireless, LLC

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Case No(s). 17-1948-TP-UNC

Summary: Comments In the matter of petition of AT&T Ohio seeking to relinquish its ETC designation in a portion of its service area. electronically filed by Lance Steinhart on behalf of i-wireless, LLC