

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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<b>IN THE MATTER OF THE PETITION OF</b>	)	
<b>AT&amp;T OHIO SEEKING TO RELINQUISH</b>	)	
<b>ITS ELIGIBLE TELECOMMUNICATIONS</b>	)	<b>Case No. 17-1948-TP-UNC</b>
<b>CARRIER DESIGNATION IN A PORTION</b>	)	
<b>OF ITS SERVICE TERRITORY</b>	)	

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**COMMENTS OF TELRITE CORPORATION D/B/A LIFE WIRELESS  
IN RESPONSE TO THE COMMISSION’S JUNE 28, 2018 ORDER**

COMES NOW Telrite Corporation d/b/a Life Wireless (“Telrite” or the “Company”) and files these Comments in response to the Public Utilities Commission of Ohio’s (“Commission”) June 28, 2018 Order requesting that Telrite submit comments by August 31, 2018 regarding its willingness and ability to continue to serve eligible Lifeline subscribers, providing the federal discount, within its service territory if AT&T Ohio (“AT&T”) is permitted to relinquish its eligible telecommunications carrier (“ETC”) status in the majority of its service area in Ohio.

Telrite was originally granted ETC status by the Commission on May 15, 2013 throughout non-rural Ohio service areas designated in its application in Case No. 13-173-TP-UNC. It is Telrite’s intent to continue to make available its Lifeline service with the federal discount to its current subscribers and all qualifying applicants that it is able to serve. As disclosed in its original application, Telrite offers Lifeline service primarily through the resale of facilities-based wireless carriers’ services and facilities. This Commission should be aware that the Federal Communications Commission (“FCC”) is considering whether to disallow the participation of wireless resellers in the Lifeline program altogether.<sup>1</sup> Telrite greatly appreciates the Commission’s

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<sup>1</sup> 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, and Notice of Inquiry, FCC 17-155 (rel. Dec. 1, 2017) (referenced herein as the Fourth Report and Order, NPRM, or NOI in accordance with the paragraph cited), §§ 67 - 73.

comments filed in the FCC proceeding strongly opposing the disallowance of wireless resellers participating in Lifeline. Telrite has also actively opposed this and other proposals in the NPRM that would greatly harm Telrite's ability to continue to provide Lifeline service.

With that in mind, Telrite currently 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 when it issues its order or unless the FCC's rulemaking results 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. Once the FCC issues its decision in this matter, should anything necessitate a change in Telrite's approach to the Ohio Lifeline marketplace, Telrite will inform the Commission.

Respectfully submitted this 29th day of August, 2018.

/s/ Susan J. Berlin

Susan J. Berlin

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Summary: Comments COMMENTS OF TELRITE CORPORATION D/B/A LIFE WIRELESS IN  
RESPONSE TO THE COMMISSION'S JUNE 28, 2018 ORDER  
electronically filed by Susan J Berlin on behalf of Telrite Corporation d/b/a Life Wireless