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June 20, 2012

ELECTRONIC FILING

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

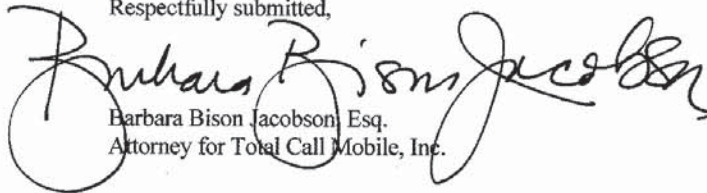
Re: Total Call Mobile, Inc.

Dear Ms. McCauley:

Attached please find for filing Total Call Mobile, Inc.'s Application for Designation as a Low-Income Competitive Eligible Telecommunications Carrier.

If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,



Barbara Bison Jacobson, Esq.
Attorney for Total Call Mobile, Inc.

Enclosures
cc: Nathaniel Law

**THIS FILING IS INTENDED TO REPLACE THE FILING PREVIOUSLY SUBMITTED ON
JUNE 21, 2012, WHICH INADVERTENTLY ATTACHED AN INCORRECT DOCUMENT**

The Public Utilities Commission of Ohio
TELECOMMUNICATIONS SUPPLEMENTAL APPLICATION FORM for
COMPETITIVE ELIGIBLE TELECOMMUNICATION CARRIER
(CETC) DESIGNATION LOW-INCOME UNIVERSAL SERVICE
Per the Commission's 01/19/2011 "Implementation Order" in Case No. 10-1010-TP-ORD
(Effective: 01/20/2011)

TRF Docket No. 90-_____

In the Matter of the Application of

Total Call Mobile, Inc.

)

Case No. _ - ____ -TP-UNC

for Designation as a Low-Income

)

Note: Unless you have a reserved a Case

Competitive Eligible Telecommunications Carrier

)

No. leave the "Case No" fields BLANK

Name of Applicant:

Total Call Mobile, Inc.

DBA (s) of Applicant:

Address of Applicant:

1411 W. 190th St., Suite 700, Gardena, California 90248

Company Web Address:

www.totalcallmobile.com

Contact Person(s):

Robert Yap

Contact Person(s) Email Address: lifeline@totalcallmobile.com

Phone: (310) 818-4300 **Fax:** (310) 818-4310

Facilities-based Wireline applicant must obtain a Certificate of Public Convenience and Necessity in Ohio prior to applying for CETC Designation

Facilities-based Wireless applicant must register as a Wireless Service Provider in Ohio prior to applying for CETC Designation

Part I - Requirements

Check [✓]

____✓____

Lifeline Requirements pursuant to 4901:1-6-19 OAC

Check [✓]

____✓____

FCC-Required Services 47 C.F.R. § 54.101

The carrier provides that it is capable of providing the following services supported by the federal universal service fund:

- Voice-grade access to the public switched network
- Minutes of use for local service at no additional charge to the consumer
- Access to emergency services, including 911 and enhanced 911
- Toll limitation for qualifying low-income customers

Facilities 47 C.F.R. § 54.201

Offer the services that are supported by federal universal service support mechanisms under subpart B of this part and section 254(c) of the Act,

The carrier will provide these services through (check [✓] the one that applies):

- _____ Its own facilities;
- _____ Its own facilities (which includes the purchase of unbundled network elements);
- _____ Its own facilities and resale of another carriers services; or
- _____ Its own facilities (which includes the purchase of unbundled network elements) and resale.
- ☒ Non-facilities based carrier must provide a copy of the FCC Facilities Forbearance Order and Compliance Plan. (See Attachment 1, Section IV.A and Exhibit M)

Advertising 47 C.F.R. § 54.201

(check [✓] all that apply)

- ☒ The carrier will advertise the availability of supportable services and their rates annually in a print media(s) of general circulation throughout its service territory(s) utilizing the language recommended by the Commission. (Carriers are at liberty to propose their own advertising language, but are put on notice that it may lengthen the ETC approval process. Any proposed alternative language must be attached to this application. (Exhibit G)

Total Call is a prepaid wireless telecommunication provider. The Commission's recommended advertising language is applicable to basic telephone service offered by wireline telecommunications providers. Therefore, the Company respectfully requests the authority to develop and utilize its own advertising language specific to its prepaid wireless Lifeline services in Ohio.

- ☒ Indicate generally the type of media to be employed:
Total Call will advertise the availability and rates for the services described above using media of general distribution as required by Section 214(e)(1)(A) of the Communications Act and Section 54.201(d)(2) of the FCC's regulations.

- _____ Intend to utilize the Commission's recommended advertising language.

Public Interest Standard 47 C.F.R. § 54.202

Public Interest Standard determination of an application is evaluated on a case-by-case basis considering increased customer choice, advantages and disadvantages. Explain in application benefits including unique advantages (Exhibit C)

Part II - Exhibits

Note that the following exhibits are required for all filings using this form.

Exhibit	Description
A	Proposed service offer including description of services, Lifeline eligibility requirements, rates and charges for Linkup/Lifeline service offerings
B	Complete breakdown of Lifeline customer discount components
C	Public Interest: Explain customer benefits or unique advantages of service offering
D	Detailed enrollment process for eligible Lifeline customer including verification process and timelines
E	All information that a new Lifeline subscriber receives after enrollment including terms and conditions
F	Copy of the Lifeline customer program enrollment form
G	Copy of proposed advertising language and materials to advertise Lifeline
H	Detailed process used to ensure only one Lifeline benefit/phone per household

Part III - Attestation

Registrant hereby attests to its compliance with pertinent entries and orders issued by the Commission.

AFFIDAVIT


Compliance with Commission Rules

I am an officer/agent of the applicant, Total Call Mobile, Inc., and am authorized to make this statement on its behalf.

I attest that this petition complies with all applicable rules for the state of Ohio. I understand that this petition filing does not imply Commission approval and that the Commission's rules, as modified and clarified from time to time, supersede any contradictory provisions in our petition. We will fully comply with the rules of the state of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the state of Ohio.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on (Date) 6/15/12 at (Location) Los Angeles, CA

*(Signature and Title)  , COO (Date) 6/15/12

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

VERIFICATION

I 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.

*(Signature and Title)  COO (Date) 6/15/12

**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.*

Send your completed Supplemental Application Form, including all required attachments as well as the required number of copies, to:

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

Or

ATTACHMENT 1

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of
Total Call Mobile, Inc.
for Designation as a Low-Income Competitive
Eligible Telecommunications Carrier

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)
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Case No. ____-____-TP-UNC

**APPLICATION OF TOTAL CALL MOBILE, INC.
FOR DESIGNATION AS A LOW-INCOME COMPETITIVE ELIGIBLE
TELECOMMUNICATIONS CARRIER**

Barbara Bison Jacobson, Esq.
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E-MAIL: bbjacobson@bisonjacobson.com

Attorney for Total Call Mobile, Inc.

June 20, 2012

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**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Total Call Mobile, Inc. for Designation as a Low-Income Competitive Eligible Telecommunications Carrier)))))	Case No. ____-____-TP-UNC
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**APPLICATION OF TOTAL CALL MOBILE, INC.
FOR DESIGNATION AS A LOW-INCOME COMPETITIVE ELIGIBLE
TELECOMMUNICATIONS CARRIER**

I. INTRODUCTION

Total Call Mobile, Inc. (“Total Call” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Public Utilities Commission of Ohio (“Commission”), hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Ohio. Total Call seeks ETC designation solely to provide Lifeline service to qualifying Ohio consumers; it will not seek access to funds from the Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or providing service to high cost areas.³ As demonstrated herein, and as certified by Total Call’s COO in Exhibit I, Total Call meets all the statutory and regulatory requirements for designation as an ETC in the State of Ohio, including the new requirements outlined in the

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ Given that Total Call only seeks Lifeline support from the low-income program and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to Total Call.

FCC's *USF/ICC Transformation Order*⁴ and *Lifeline and Link Up Reform Order*.⁵ Rapid grant of Total Call's request, moreover, would advance the public interest because it would enable the Company to commence much needed Lifeline services to low-income Ohio residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application for ETC designation.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Barbara Bison Jacobson, Esq.
The Bison Jacobson Firm LLC
Attorney for Total Call Mobile, Inc.
2199 Victory Parkway
Cincinnati, Ohio 45206
TELEPHONE: 513-898-0668
FACSIMILE: 513-297-7958
E-MAIL: bbjacobson@bisonjacobson.com

With a copy to:⁶

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⁴ *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*").

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

⁶ Mr. Steinhart intends to file a Motion to Appear Pro Hac Vice in this Case.

II. TOTAL CALL'S UNIVERSAL SERVICE OFFERING

A. Company Overview

Total Call is a Delaware Corporation.⁷ Its principal office is located at 1411 W. 190th St., Suite 700, Gardena, California 90248. Total Call is a provider of commercial mobile radio service ("CMRS") throughout the United States. Total Call provides nationwide, prepaid and postpaid wireless telecommunications services to consumers by reselling the network services of Sprint PCS ("Sprint"). Total Call is currently designated as an ETC in Maryland, and has applications for ETC designation pending with Arkansas, Louisiana, Michigan, Nevada, and West Virginia; no such petitions have been denied.

Total Call's wireless services that are affordable and easy to use are attractive to low-income and lower-volume consumers, providing them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family and for contacting prospective employers. Total Call offers consumers simple and affordable calling plans, a variety of prepaid and postpaid service plans, easy-to-use handsets and high-quality customer service. Based upon internal surveys and given its pricing and marketing strategy and the demographics of other, similar Mobile Virtual Network Operators' ("MVNO") customers, Total Call anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment. Total Call does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining prepaid wireless service.

⁷ Total Call was incorporated in the State of Delaware on August 11, 2005.

By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or were previously ignored by traditional carriers, Total Call will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

B. Proposed Lifeline Plans

Total Call has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout Ohio. Total Call intends to be a leader in the wireless marketplace by offering consumers exceptional value and competitive amounts of voice usage at all price points.

Lifeline Offering. The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other Total Call prepaid customers, with one notable exception: prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, Total Call will receive support from the Lifeline program as compensation for providing those services. As Exhibit A demonstrates, Total Call's Lifeline service offering proposes to give eligible customers three (3) Lifeline Plan choices:

1. 150 Minute Plan. Under this Plan, eligible customers enjoy a free handset, 150 anytime minutes per month, and international calling to 250 locations for no additional per minute charge. Additional usage is priced at 10 cents per minute and 5 cents per text. Except for the 250 included international locations, there is an additional per minute charge to make international calls.
2. 250 Minute Plan. Under this Plan, eligible customers receive a free handset and 250 anytime minutes per month. Additional usage is priced at 10 cents per minute and 5 cents per text.

3. Lifeline Credit Plan. Under this Plan, Lifeline-eligible customers may apply the Lifeline discount, currently \$9.25, to either the Company's 30 Day Unlimited Talk, Text, and Data prepaid retail plan or the 30 Day Unlimited Talk and Text prepaid retail plan.

Total Call does not impose burdensome credit checks or long-term service contracts on its prepaid customers. All plans come with a free handset, free customer care calls, free balance inquiries, and access to voice mail, caller I.D. and call waiting features at no additional charge. Customers are not bound by a local calling area requirement; all Total Call plans come with domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Given this nationwide coverage, there is minimal need for roaming. So that customers will not incur unexpected roaming charges, Total Call blocks roaming ability on its Lifeline handsets. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

As Exhibit A demonstrates, the Company's Lifeline offerings will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of eligible customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without a the burden of credit checks or service contracts. Total Call's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

C. Prevention of Waste, Fraud and Abuse

Total Call recognizes the importance of safeguarding the USF. Therefore, the Company has implemented the following activation and 60-day non-usage policy in an effort to avoid

waste, fraud, and abuse of the program. Each subscriber activates the service by placing a call to Total Call. The Company will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber places this call demonstrating usage of the phone.⁸ In addition, after service activation, the Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the Company to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the Company, its representative, or agent; or affirmatively responds to a direct contact from the Company confirming that he or she wants to continue.⁹ After 60 days of non-use, the Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.¹⁰ If the subscriber does not respond to the notice, the subscriber will be de-enrolled and Company will not request further Lifeline reimbursement for the subscriber. Company will report annually the number of subscribers de-enrolled for non-usage by month.¹¹ Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.¹² Although Section 332(c)(3)(A) of the Act

⁸ See *Lifeline and Link Up Reform Order* at ¶ 257; 47 C.F.R. § 54.407(c)(1).

⁹ See *Lifeline and Link Up Reform Order* at ¶ 261.

¹⁰ See *Lifeline and Link Up Reform Order* at ¶ 257; 47 C.F.R. § 54.405(e)(3).

¹¹ See *id.*

¹² 47 U.S.C. § 214(e)(2).

prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.¹³ Therefore, the Commission has the authority to designate Total Call as an ETC. Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier, including any requesting wireless carrier.¹⁴ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). Total Call recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC's Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier's services. However, as discussed in Section IV.A below, the FCC granted Total Call forbearance from the facilities-based service requirement in its *Lifeline and Link Up Reform Order*.¹⁵ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a] State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance with the FCC's grant of forbearance to Total Call, and therefore may not apply the facilities-based

¹³ See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“USF Order”).

¹⁴ See e.g., *In the Matter of the Commission Investigation of the Intrastate Universal Service Discounts, Supplemental Finding and Order*, Case No. 97-632-TP-COI (May 21, 2009) (“TracFone ETC Order”); *In the Matter of the Application of Cincinnati Bell Wireless LLC for Designation as an Eligible Telecommunications Carrier in the State of Ohio*, Case No. 10-2449-TP-UNC, Order (December 29, 2010) (“CBW ETC Order”); *In the Matter of the Application of Nexus Communications dba Reachout Wireless for Designation as an Eligible Telecommunications Carrier in the State of Ohio*, Case No. 10-432-TP-UNC, Order (June 22, 2011) (“Nexus ETC Order”).

¹⁵ See *Lifeline and Link Up Reform Order* ¶ 521.

requirement to Total Call. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant Total Call's request for designation as an ETC throughout the State of Ohio.

A. The ETC Designation Request Is Consistent with Recent Commission Precedent

Total Call's request for ETC designation to participate in the Lifeline program is consistent with the Commission's recent designations of TracFone, CBW, and Nexus as ETCs.¹⁶ In its decisions, the Commission determined that TracFone, CBW, and Nexus satisfied all of the necessary eligibility requirements and that designation of a prepaid wireless provider as an ETC would serve the public interest. Total Call requests that the Commission expeditiously process its ETC Application so that it can quickly commence providing qualifying low-income Ohio customers with affordable USF-supported wireless services during these challenging economic times for all state residents. Designation of Total Call as an ETC would further competition for wireless Lifeline services and would offer Lifeline-eligible consumers an additional choice of providers for accessing telecommunications services, representing a significant step towards ensuring that all low-income consumers share in the many benefits associated with access to wireless services.

IV. TOTAL CALL SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support." Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to

¹⁶ See *TracFone ETC Order*; *CBW ETC Order*; and *Nexus ETC Order*.

designate wireless ETCs.¹⁷ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services, except where the FCC has forbore from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.¹⁸ As detailed below, Total Call satisfies each of the above-listed requirements.

A. Total Call Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements

Total Call, in its provision of wireless services, will rely on resold services which the Company will obtain from underlying wireless providers that currently operate their own networks. In its *Lifeline and Link Up Reform Order*, the FCC granted Total Call’s request for forbearance from the facilities requirement, and stated, “the Commission will forbear from the “own-facilities” requirement contained in section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹⁹

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.”

¹⁷ *USF Order*, at 8858-59, ¶ 145.

¹⁸ *See* 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

¹⁹ *See Lifeline and Link Up Reform Order* at ¶¶ 368, 373 and 379.

Total Call will avail itself of the FCC's grant of blanket forbearance. In accordance with the *Lifeline and Link Up Reform Order*, Total Call filed its revised Compliance Plan with the FCC on March 16, 2012, and the FCC released an Order approving the Company's Compliance Plan on May 25, 2012. A copy of Total Call's approved Compliance Plan is attached hereto as Exhibit M. Total Call commits to providing Lifeline service in Ohio in accordance with the Compliance Plan.

B. Total Call Is a Common Carrier

CMRS providers like Total Call are treated as common carriers.²⁰

C. Total Call Will Provide All Required Services and Functionalities

Total Call offers, or will offer upon designation as an ETC in Ohio, all of the services and functionalities required by Section 54.101(a) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a)) including the following:

1. Voice Grade Access to the Public Switched Telephone Network

Total Call provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from Sprint.

2. Local Usage

As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. The FCC has not specified a minimum

²⁰ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services*." (emphasis added)).

amount of local usage that an ETC must offer.²¹ Total Call offers a variety of rate plans that provide its customers with minutes of use for local service at no additional charge.

3. Access to Emergency Services

Total Call provides 911 and E911 access for all of its customers even when there is a zero balance on a handset. Total Call also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

4. Toll Limitation for Qualified Low-Income Customers

In its *Lifeline and Link Up Reform Order*, the FCC stated that toll limitation would no longer be deemed a supported service.²² "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."²³ Nonetheless, Total Call's offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid pay-as-you-go basis. The Company's service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same. Total Call will not seek reimbursement for toll limitation service.

5. Other Services

While no longer required by 47 C.F.R. § 54.101(a), Total Call provides dual tone multi-frequency ("DTMF") signaling to expedite the transmission of call set up and call detail information throughout the network, single party service for the duration of each telephone call and not multi-party (or "party-line") services, access to operator services, the ability to make

²¹ See, e.g. *In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision 15 FCC Rcd 7331 (2002).

²² See *Lifeline and Link Up Reform Order* at ¶ 367.

²³ See *id.* at ¶ 49.

interexchange, or long distance, telephone calls, and access to directory assistance services by dialing “411” from the provided wireless handsets.

D. Total Call Will Advertise the Availability of Supported Services

Total Call will broadly advertise the availability and rates for the services described above using media of general distribution as required by Section 54.201(d)(2) of the FCC’s regulations²⁴ and in accordance with the requirements set forth in the *Lifeline and Link Up Reform Order*.²⁵ The Company will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline services, and plans on using multiple mediums for outreach including direct mail, community events, and the internet. The Company will engage in advertising campaigns specifically targeted to reach those likely to qualify for Lifeline services, promoting the availability of cost-effective wireless services to this neglected consumer segment. Total Call will also promote the availability of its Lifeline offerings by distributing brochures at various state and local social service agencies in order to inform customers of the availability of its Lifeline services.

In addition, the Company has an extensive distribution network throughout the state of Ohio. Advertisements regarding the availability and rates for the aforementioned services will be widely distributed to retail locations that sell Company products through mediums such as posters, print ads, pamphlets, and flyers.²⁶ Total Call expects to be able to inform consumers of the availability of Lifeline service in a manner that will result in significantly higher participation by qualified consumers than has been the case in the past.

²⁴ See 47 C.F.R. § 54.201.

²⁵ See *Lifeline and Link Up Reform Order* at Section VII.F.

²⁶ See attached Exhibit G for a sample advertisement.

Statistics suggest that there are many eligible customers who are not yet aware of the Lifeline programs. According to the best data available to the Company, as of December 31, 2010, only between 20-50% of consumers eligible for Lifeline Services in the State of Ohio were being provided such services.²⁷ Total Call believes that its advertising and outreach efforts detailed above will result in increased participation in the Lifeline program.

E. Total Call Requests Designation Throughout Its Service Area in Ohio

Total Call is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, Total Call is required to describe the geographic area(s) within which it requests designation as an ETC. Total Call requests designation as an ETC that is statewide in scope, subject to the existence of its underlying carrier's facilities and corresponding coverage.²⁸ Total Call understands that its service area overlaps with many rural carriers in Ohio, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. It does not seek and will not accept high cost support. Nor does the Company seek to provide Link-Up service.

Therefore, its designation as an ETC will cause no growth in the high cost portions of the USF and will not erode high cost support from any rural telephone company. In fact, the FCC has determined that "[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and

²⁷ See attached Exhibit K, 2010 Lifeline Participation Rates by State, which was obtained from USAC, an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC. USAC administers Universal Service Fund (USF) programs for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries.

²⁸ A list of wire centers in which the Company requests ETC designation is attached hereto as Exhibit L.

new technologies.”²⁹ In the *TracFone ETC Order*, this Commission noted that the distinction between nonrural and rural has little significance for the purpose of Lifeline support.³⁰ The Commission may designate Total Call as an ETC in non-rural areas that Total Call serves without redefining the service areas of non-rural telephone companies. The Commission may designate Total Call as an ETC in rural telephone company service areas upon a finding that such designation would serve the public interest.³¹

F. Service Commitment Throughout the Proposed Designated Service Area

Total Call provides service in Ohio by reselling service which it obtains from its underlying carrier. The provider’s network is operational and largely built out. Thus, Total Call will be able to commence offering its Lifeline service to all locations served by its underlying carrier very soon after receiving approval from the Commission. Total Call commits to comply with the service requirements applicable to the support that it receives.³²

G. Five-Year Network Improvement Plan

As set forth in the *Lifeline and Link Up Reform Order*, a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.³³

H. Ability to Remain Functional in Emergency Situations

In accordance with 47 CFR §54.202(a)(2), Total Call has the ability to remain functional in emergency situations. Through its agreement with its underlying carrier, Total Call will

²⁹ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

³⁰ See *TracFone ETC Order* at p.8-9.

³¹ See 47 C.F.R. § 54.207(c).

³² See *Lifeline and Link Up Reform Order* page 208, revised § 54.202(a)(1)(i).

³³ See *Lifeline and Link Up Reform Order* at ¶ 386.

provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

I. Commitment to Consumer Protection and Service Quality

Under FCC guidelines, an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards.³⁴ The Company commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Total Call commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

Total Call also commits to exceptional customer service standards. Customers will experience the level of service, including wait times, typical of post-paid customer service, which is generally superior to prepaid service. Customers are also able to contact Customer Care via the Company's website or by mail. In addition, there are a number of automated systems and web options for customer needs. Customers may call Total Call or visit the Company's website to ask questions or buy additional airtime, should they wish to do so. Total Call is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner. Total Call will designate a contact person to work with the Commission regarding complaint resolution. Once Total Call is made aware of consumer complaints/inquiries, Total Call will respond by a trained customer care supervisor or manager within 24-48 hours. Where a phone number is associated with the complaint, the customer will be contacted by telephone (minutes

³⁴ See 47 C.F.R. § 54.202(a)(3).

will not count against the customer). Otherwise, Total Call will use e-mail or regular mail, depending on the customer's preference or the information available to Total Call.

J. Local Usage Requirement

FCC rules no longer require an applicant for ETC designation to demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.³⁵ Nevertheless, similar to ILEC Lifeline offerings, Total Call customers will have the option to apply the Lifeline discount to the Company's retail rate plans and will have the option for unlimited local calling (i.e. if the customer signs up for Lifeline Plan Option 3, which provides options on discounted rates for unlimited talk, text, and web). Not only will Total Call's offering be comparable to the underlying ILEC plans, but it also will exceed them in several respects. Total Call will offer Lifeline customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, Total Call customers can use these free minutes to place calls statewide (or even nationwide) because Total Call does not constrict customers' use by imposing a local calling area requirement. Total Call will also provide Lifeline customers with E911 capabilities at no cost as well as voice mail, caller I.D., and call waiting features at no cost. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

³⁵ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

K. Equal Access Requirement

Pursuant to revised 47 C.F.R § 54.202, Total Call is no longer required to acknowledge that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.³⁶

L. Total Call is Financially and Technically Capable

Total Call is financially and technically capable of providing Lifeline-supported services.³⁷ Total Call has been in business for 6 years and provides service to both Lifeline and non-Lifeline customers. Total Call already successfully provides wireless services in 49 states. Total Call has not been subject to enforcement action or ETC revocation proceedings in any state. The Company does not, and does not intend to, offer exclusively Lifeline-supported services—and is therefore not exclusively dependent on universal service funds for its revenue. Total Call also has the financial support of its parent company, KDDI of America (a subsidiary of KDDI of Japan, the second largest carrier in Japan). Furthermore, the senior management of Total Call has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.³⁸ Total Call will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carrier.

M. Total Call Will Comply with Lifeline Certification and Verification Requirements

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Total Call will certify and verify consumer

³⁶ See *id.*

³⁷ See *Lifeline and Link Up Reform Order* at ¶ 387.

³⁸ See Exhibit N for key management resumes.

eligibility in accordance with the FCC's requirements, including the new rules set forth in the *Lifeline and Link Up Reform Order*, and with applicable Commission rules governing certification and verification of Lifeline eligibility.³⁹ Total Call is willing to provide Commission staff with the annual recertification data that it presents to the FCC for the purpose of verifying continued Lifeline eligibility of its Ohio subscribers.

N. Total Call Will Comply With All Regulations Imposed By The Commission

By this Application, Total Call hereby asserts its willingness and ability to comply with all the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application, including regulations prescribed by the outcome of Case No. 10-1010-TP-ORD and the Commission's prepaid Lifeline investigation in Case No. 10-2377-TP-COI. Total Call contributes, on behalf of its wireless customers, to the state of Ohio's 911 Fund and Ohio's Telephone Relay Service (TRS). Total Call will likewise contribute to 911 and TRS on behalf of its Lifeline customers, and commits to make available to Commission staff, upon request, information concerning such contributions. Total Call commits to pay the applicable Commission (PUCO) assessment fee. Total Call also commits to comply with the Commission's rules regarding telephone number optimization (Rule 4901:1-7-25, O.A.C.). Total Call affirms that it will provide Commission staff with quarterly reports as required in recent ETC designations.⁴⁰ Upon Commission request, Total Call is prepared to answer questions or present additional testimony or other evidence about its services within the state.

³⁹ Total Call will comply with the certification and verification requirements as set forth in the Commission's April 13, 2005, Entry in Case No. 05-461-TP-UNC inasmuch as the rules are consistent with the *Lifeline and Link Up Reform Order*.

⁴⁰ See *CBW ETC Order* at page 14-15.

V. DESIGNATION OF TOTAL CALL AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic location or income.⁴¹ Designation of Total Call as an ETC in Ohio will further the public interest by providing Ohio consumers, especially low-income consumers, with low prices and high quality services. Many low-income customers in Ohio have yet to reap the full benefits of the intensely competitive wireless market. Whether because of financial constraints, poor credit history or intermittent employment, these consumers often lack the countless choices available to most consumers.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. Given this context, designating Total Call as an ETC would significantly benefit low-income consumers eligible for Lifeline services in the State of Ohio—the intended beneficiaries of universal service.

The public interest benefits of the Company’s wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile telephone service, the opportunity for customers to control cost by receiving a preset amount of monthly airtime at no charge, the ability to purchase additional usage at flexible and affordable amounts in the event that included usage has been exhausted, 9-1-1 service even if a handset has a zero balance) and, where available, E 9-1-1 service in accordance with current

⁴¹ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

FCC requirements. The Company's Lifeline customers will receive the same high-quality wireless services and exceptional customer service provided to all Company customers. Total Call's Lifeline rate plans will not only allow feature-rich mobile connectivity for qualifying subscribers at no cost to the subscriber, but also will bring a variety of rate plans into the reach of Lifeline customers that are comparable in minutes and features to those available to post-paid wireless subscribers – but at low Lifeline rates and without the burden of credit checks, contracts, activation fees or roaming charges.

Total Call's Lifeline service will provide low-income Ohio residents with the convenience and security offered by wireless services—even if their financial position deteriorates. Total Call's prepaid wireless plans enable consumers to enjoy the benefits of wireless telecommunication without being subject to extensive credit reviews and long-term service commitments, which historically have limited the availability of wireless service to many Americans, including many Ohio residents. ETC designation in Ohio would enable Total Call to offer appealing and affordable service offerings to low-income Ohio customers to ensure that they are able to afford wireless services on a consistent and uninterrupted basis. Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing Total Call with the authority necessary to offer discounted Lifeline services to those most in danger of losing wireless service altogether undoubtedly promotes the public interest.

Moreover, grant of Total Call's Application will serve the public interest in increasing the number of ETCs in Ohio. By granting ETC status to Total Call, the Commission will enable Total Call to increase the number of Ohio residents receiving Lifeline support, thereby increasing the

amount of USF money flowing into Ohio. In sum, ETC designation in the State of Ohio would enable Total Call to provide all of the public benefits cited by the FCC in its analysis in the *Virgin Mobile Order*. Namely, Total Call would provide “increased consumer choice, high-quality service offerings, and mobility,”⁴² as well as the safety and security of effective 911 and E911 services.⁴³

A. The Benefits of Competitive Choice

The benefits to consumers of being able to choose from among a variety of telecommunications service providers have been acknowledged by the FCC for more than three decades.⁴⁴ Designation of Total Call as an ETC will promote competition and innovation, and spur other carriers to target low-income consumers with service offerings tailored to their needs and to improve their existing networks to remain competitive, resulting in improved services to consumers. Designation of Total Call as an ETC will help assure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.⁴⁵ Introducing Total Call into the market as an additional wireless ETC provider will afford low income Ohio residents a wider choice of providers and available services while enhancing the competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

B. Impact on the Universal Service Fund

Total Call’s request for designation as an ETC solely for Lifeline purposes would not

⁴² See *Virgin Mobile Order*, 24 FCC Rcd at 3395 ¶ 38.

⁴³ See *Id.* at 3391 ¶ 23.

⁴⁴ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

⁴⁵ See 47 U.S.C. § 254(b)(1).

unduly burden the USF or otherwise reduce the amount of funding available to other ETCs. With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as Total Call or the Incumbent LEC operating in the same service area. Total Call will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not enrolled in another ETC's Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order*, Total Call will minimize the likelihood that its customers are not eligible or are receiving duplicative support either individually or within their household. Significantly, the Company's designation as an ETC will not increase the number of persons eligible for Lifeline support. Total Call's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

VI. ANTI-DRUG ABUSE CERTIFICATION

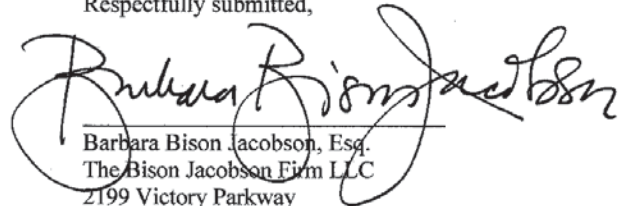
Total Call certifies that no party to this Application is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

VII. CONCLUSION

Based on the foregoing, designation of Total Call as an ETC in the State of Ohio accords with the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, Total Call respectfully requests that the Commission promptly designate Total Call as an ETC in the State of Ohio solely for purposes of participating in the Lifeline program.

Respectfully submitted,

A large, stylized handwritten signature in black ink, reading "Barbara Bison Jacobson". The signature is written over a horizontal line that separates it from the printed contact information below.

Barbara Bison Jacobson, Esq.
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Attorney for Total Call Mobile, Inc.

June 20, 2012

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EXHIBIT A Proposed service offer including description of services, Lifeline eligibility requirements, rates and charges for Lifeline service offering

Ohio Lifeline Eligibility Requirements

Participation in one or more of the following programs or, in the case of (j), income level, qualifies Ohio residents for the Lifeline Program:

- a. The National School Lunch Program's Free Lunch Program
- b. Supplemental Nutritional Assistance Program (SNAP), formerly known as Food Stamps
- c. Supplemental Security Income (SSI)
- d. Social Security Disability Insurance – Blind and Disabled (SSDI)
- e. General Assistance including Disability Assistance
- f. Medicaid
- g. Temporary Assistance to Needy Families/Ohio Works First
- h. Federal Public Housing Assistance (Section 8)
- i. Low Income Home Energy Assistance Program (LIHEAP)
- j. Income that is at or below 150% of the Federal Poverty Guidelines (current table shown below):

150% of the Federal Poverty Guidelines		
Number of People in Household	Annual Income Level	Monthly Income Level
1	\$16,755	\$1,396
2	\$22,695	\$1,891
3	\$28,635	\$2,386
4	\$34,575	\$2,881
5	\$40,515	\$3,376
6	\$46,455	\$3,871
7	\$52,395	\$4,366
8	\$58,335	\$4,861
each additional member	\$5,940	\$495

Qualified Ohio residents may only receive one Lifeline phone, wireless or landline, per household. Customers qualifying under the above income parameters must provide proof of income. Acceptable proof of income includes the following documents:

- a. State or federal income tax return;
- b. Current income statement or W-2 from an employer;
- c. Three consecutive months of current pay stubs;
- d. Social Security statement of benefits;
- e. Retirement/Pension statement of benefits;
- f. Unemployment/Workmen's Compensation statement of benefits;
- g. Any other legal document that would show current income (such as a divorce decree or child support document)

Option 1: Lifeline 150 Minute Plan*

150 anytime minutes per month

(additional usage priced at 10 cents per minute; texts are 5 cents per text message by loading an “Anytime Plan” refill card to the handset account)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- 150 anytime minutes per month (the included 150 anytime minutes expire after 30 days)
- “International Location Promo” - No additional charge for international calling to the 250 locations on the list that follows Lifeline Offering- Option 3, as with the standard TCM Anytime Plan (i.e. only the standard per minute rate applies)
- International calls to other destinations require additional funds based on call destination

Option 2: Lifeline 250 Minute Plan*

250 anytime minutes per month

(additional usage priced at 10 cents per minute, texts are 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- 250 anytime minutes per month (the included 250 anytime minutes expire after 30 days)
- The “International Location Promo” does not apply to the Lifeline 250 Minute Plan
- International calls require additional funds based on call destination

Option 3: Lifeline Credit - Discount on Certain 30 Day Plans*

Lifeline-eligible customers may apply the Lifeline discount to either the 30 Day Unlimited Talk, Text, and Data or the 30 Day Unlimited Talk and Text prepaid retail plan. Details on TCM's 30 Day Unlimited Talk, Text, and Data or 30 Day Unlimited Talk and Text plans can be found at http://www.totalcallmobile.com/rateplans_prepaid.aspx

*This package includes:

- Free handset
- Free Voicemail, Caller-ID, and call waiting
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries

Free International Calling Destinations on the Lifeline 150 Minute Plan (Certain special or off-network locations may be excluded from the Free International Calling Destinations)

Over 250 locations worldwide and 30 countries included
(termination to landline phones only; termination to mobile phones excluded)

Locations are subject to change from time to time. Please visit totalcallmobile.com for an updated list.

Featured Countries

Argentina	Greece	Norway
Argentina-Buenos Aires	Greece-Athens	Peru
Argentina-Cordoba	Hong Kong	Peru-Lima
Argentina-Mendoza	Hong Kong-Cellular	Poland
Argentina-Rosario	Hungary	Poland-Warsaw
Australia	Hungary-Budapest	Portugal
Australia-Melbourne	India	Singapore
Austria	India-Ahmedabad	Singapore-Cellular
Brazil	India-Bangalore	South Korea
Brazil-Belo Horizonte	India-Bombay	South Korea-Seoul
Brazil-Campinas	India-Calcutta	Spain
Brazil-Rio de Janeiro	India-Cellular	Sweden
Brazil-Sao Paolo	India-Hyderabad	Switzerland
Canada	India-Madras	Taiwan
China	India-New Delhi	Taiwan-Taipei
China-Beijing	India-Pune	Thailand
China-Cellular	India-Punjab	Thailand-Bangkok
China-Guangzhou	Ireland	Thailand-Cellular
China-Shanghai	Israel	United Kingdom
Cyprus	Italy	US Guam
Denmark	Mexico (city list which follows)	US Puerto Rico
France	Netherlands	US Saipan
France-Paris	Netherlands-Amsterdam	US Virgin Islands
Germany	New Zealand	

Free International Calling Destinations on the Lifeline 150 Minute Plan (continued)

Mexico City List

Guadalajara	Ciudad Constitucion	Heroica Ciudad de Ures
Ciudad de Mexico	Ciudad Cuauhtemoc	Hidalgo
Monterrey	Ciudad del Carmen	Huatabampo
Acaponeta	Ciudad Delicias	Huetamo
Acapulco	Ciudad Guzman	Huimanguillo
Actopan	Ciudad Hidalgo	Huitzuco
Agua Prieta	Ciudad Juarez	Iguala
Aguascalientes	Ciudad Lazaro Cardenas	Irapuato
Allende	Ciudad Mante	Ixtapan de la Sal
Apatzingan	Ciudad Obregon	Ixtlan del Rio
Apizaco	Ciudad Sahagun	Izucar de Matamoros
Arcelia	Ciudad Valles	Jalapa
Atlacomulco	Ciudad Victoria	Jalpa
Atliaca/Tixtla	Coatzacoalcos	Jerez de Garcia Salinas
Atlixco	Colima	Jojutla
Autlan	Cordoba	Juchitan
Bahia de Huatulco	Cosamaloapan	La Barca
Cabo San Lucas	Cozumel	La Paz
Caborca	Cuautla	La Piedad
Cadereyta Jimenez	Cuernavaca	Lago de Moreno
Campeche	Culiacan	Leon
Cananea	Durnago	Lerdo de Tejada
Cancun	Encarnacion de Diaz	Lerma
Celaya	Ensenda	Linares
Cerralvo	Estación Manuel	Los Mochis
Cheumal	Fresnillo	Los Reyes
Chihuahua	General Tapia	Magdalena
Chilapa	Guamuchil	Manuel
Chilpancingo	Guanajuato	Manuel Ojinaga
Cintalapa de Figueroa	Guasave	Manzanillo
Ciudad Acuna	Guaymas	Martinez de la Torre
Ciudad Altamirano	Guerrero Negro/Santa Rosa	Matamoros
Ciudad Camargo B	Hermosillo	Matehuala

Free International Calling Destinations on the Lifeline 150 Minute Plan (continued)

Mexico City List (continued)

Mazatlan	Rio Grande	Tenango del Aire/Tlalmanalco
Merida	Rio Verde	Tepatitlan
Mexicali	Sabinas	Tepic
Minatitlan	Sahuayo	Tequila
Monclova	Salamanca	Texcoco
Moelia	Saltillo	Teziutlan
Moroleon	Salvatierra	Ticul
Nacozari de Garcia	San Andres Tuxtla	Tijuana
Navojoa	San Cristobal de las Casas	Tizayuca
Nogales	San Fernando	Tizimin
Nuevo Casas Grandes	San Jose de Gracia	Tlapa de Comonfort/
Nuevo Laredo	San Jual del Rio	Alcozauca de Gro.
Oaxaca de Juarez	San Luis de La Paz	Tlaxcala
Ocotlan	San Luis Potosi	Toluca
Ometepec	San Luis Rio Colorado	Torreon
Orizaba	San Martin Pachivia/Teloloapa	Tula
Pachuca	San Miguel de Allende	Tulancingo
Palenque	San Quintin	Tuxpan
Parral	Santa Ana	Tuxtepec
Parras de la Fuente	Santa Rosalia de Camargo	Tuxtla Gutierrez
Patzcuaro	Santiago Ixcuintla	Uruapan
Penjamo	Santiago Papasquiaro	Valle de Bravo
Petatlan	Santiago Tianguistenco	Veracruz
Piedras Negras	Silao	Villa Flores
Playas de Rosarito	Tala	Villahermosa
Poza Rica de Hgo	Tampico	Yurecuaro
Puebla	Tapachula	Zacapu
Puerto Penasco	Taxco	Zacatecas
Puerto Vallarta	Tecate	Zamora
Puruandiro	Tecoman	Zihuatanejo
Queretaro	Tecpan de Galeana	Zinapécuaro
Quimichis/Tecuala	Tehuacan	Zitacuaro
Reynosa	Tenancingo	Zumpango

EXHIBIT B Complete breakdown of Lifeline customer discount components

The Company will seek available reimbursements from the USF and subsidize the remaining discounts out-of-pocket. Both USF supported and company-subsidized discounts are passed through 100% to the customer and are applied as follows:

Lifeline 150 Minute Plan – This plan is derived from applying \$15 of Lifeline support to the Company's Anytime Plan retail plan. On this plan, \$15 purchases 150 minutes of nationwide, domestic calling or international calling to over 250 locations (see Free International Locations in Exhibit A).

Lifeline 250 Minute Plan – In lieu of the Free International calling in the 150 Minute Plan above, a customer can choose a bonus 100 nationwide domestic minutes. This allows Lifeline customers to choose the plan that best suits their needs. Unlike many of its competitors, the Company's 250 Minute Plan also includes free customer care calling and unlimited free balance inquiries.

Lifeline Credit – Discount on Certain 30 Day Plans – The Lifeline discount, which is set at \$9.25 effective August 1, 2012, is applied to the retail price of the Company's popular unlimited calling plans. Lifeline-eligible customers may apply this discount to either the 30 Day Unlimited Talk and Text prepaid retail plan (regularly \$39.99) or the 30 Day Unlimited Talk, Text, and Data prepaid retail plan (regularly \$49.99).

EXHIBIT C Public Interest: Explain customer benefits or unique advantages of service offering

Total Call does not impose burdensome credit checks, restrictive service contracts, or roaming charges to its Lifeline customers. Furthermore, Total Call does not assess charges for activation or connection of service. The 150 and 250 minute plans include all applicable taxes and fees; thus, Lifeline customers are able to receive free service with no additional charges. Moreover, by providing a wireless handset free of charge, Total Call guarantees that eligible customers can access the Company's Lifeline services without incurring any upfront or recurring costs. Minutes are credited to a customer's account at the beginning of every 30-day cycle, which is initiated on their Lifeline activation date. A customer's handset does not have to be "on" to receive minutes, as Total Call's operations are system-based, not handset-based. Customers may place calls to 911 for free, even if there are no minutes remaining on their account.

Lifeline customers will receive an E911-compliant wireless handset at no charge. These phones come with a one year mechanical warranty and will be replaced at no charge upon handset malfunction.

All of Total Call's Lifeline plans include access to voice mail, caller I.D. and call waiting services at no additional charge. Customers are not bound by a local calling area requirement; all Total Call plans come with domestic long distance at no extra charge and exceptional nationwide digital coverage on the Nationwide Sprint PCS Network. Unlike many carriers, Total Call does not decrement minutes or account balances for balance inquiries or calls placed to Total Call customer service. Total Call Lifeline customers will have access to the same exceptional customer care provided to its retail customers. The Company maintains its own high quality, U.S. domestic customer care group whose hold time is very low, compared to the rest of

the wireless industry. Therefore the benefits Total Call offers in regards to customer service are three-fold: service standards are high, wait times are low, and minutes of use do not count against a customer's account balance.

EXHIBIT D Detailed enrollment process for eligible Lifeline customer including verification process and timelines

Total Call will enroll customers in accordance with its Compliance Plan, attached hereto as Exhibit M. Customers will be able to sign up for Lifeline assistance by contacting Total Call via telephone, facsimile, or the internet. Company personnel will verbally explain the eligibility criteria to consumers when they are enrolling in person or over the phone. At the point of sale, consumers will be provided with printed information describing Total Call's Lifeline program in detail, including federal and state specific eligibility requirements, and instructions for enrolling, a description of the one-per-household rule and a copy of USAC's printed material describing the one-per-household rule.⁴⁶ These materials (like all Lifeline marketing materials) also will clearly identify supported plans as "Lifeline" plans, consistent with Total Call's current practice and policies. Consumers will be directed to a toll-free telephone number and to Total Call's website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program, rates, and federal and state-specific eligibility criteria.

Total Call will have direct contact with all customers applying for participation in the Lifeline program either by mail or by phone and all marketing materials will include Total Call's customer service number. Retailers and distributors will be able to assist customers in completing applications but will provide Total Call's customer service number for further questions and assistance. Retailers or customers will then directly send the applications and supporting documents to Total Call. Retailers will not retain any copies of the customer application or supporting documentation, and company personnel will review and process all applications.

⁴⁶ See *Lifeline and Link Up Reform Order* at ¶ 79.

Total Call's enrollment form, a sample of which is attached as Exhibit F, will collect the information required and contain the disclosures and certifications required by the *Lifeline and Link Up Reform Order*.⁴⁷ Total Call has contracted with Howard Roark Consulting, a Cincinnati, Ohio based consulting firm with significant telecommunications and Lifeline experience, to staff, train and manage the customer application review and verification process, and to help ensure that Total Call is in compliance with federal and state regulations at all times. Applications will, generally, be processed within 48 hours. Customers will either receive a welcome package, if approved, or a denial letter. Denial letters will outline the application deficiency and how, if possible, the potential Lifeline customer can provide additional information to clear the deficiency. A toll free number will be provided in order for the potential Lifeline customer to call for assistance.

⁴⁷ See *Lifeline and Link Up Reform Order* section VI.C(a); see also revised 47 CFR § 54.410(d).

EXHIBIT E All information that a new Lifeline subscriber receives after enrollment including terms and conditions

Upon successful enrollment in the Company's Lifeline Plan, Total Call will mail the customer a free handset, complete with phone charger, in a welcome kit. The welcome kit will include the attached terms and conditions, and will explain the Company's Lifeline Plan options and direct the customer to call Total Call customer service to select their Plan choice.



Lifeline Program Terms & Conditions

1. Agreement to Terms & Conditions. These Lifeline Program Terms & Conditions and the Total Call Mobile (“TCM”) Standard Terms & Conditions at www.totalcallmobile.com, which are incorporated herein by reference, apply to the TCM Lifeline Program. With regard to the TCM Lifeline Program, if these Terms & Conditions conflict with the Standard Terms & Conditions, these Terms & Conditions shall control. In interpreting these Terms & Conditions, TCM Lifeline plans shall be treated as prepaid Services. By using your TCM Lifeline Program plan or phone, you accept these Terms & Conditions.

2. Plan Options. The TCM Lifeline Program plans available in your state can be found at www.totalcallmobile.com/lifeline. You understand and agree that TCM may change the TCM Lifeline Program plans (including any rates and fees) at anytime by updating plan information on its website. If you change your choice of plans, your changes will not be effective until the subsequent month.

3. Government Subsidized. The TCM Lifeline Program is supported by subsidies from state and federal governments including the Federal Universal Service Fund program. You acknowledge and agree that TCM may immediately modify or terminate the TCM Lifeline Program in the event that there are any changes to the applicable governmental programs and subsidies.

4. Program Availability. The TCM Lifeline Program is only available in areas where TCM has been authorized by the applicable state and/or federal agency. To enroll in the TCM Lifeline Program, your principal residence address must be within an authorized area.

5. Customer Eligibility. To be eligible for the TCM Lifeline Program, you must meet the applicable eligibility standards in effect at the time of application (i.e. based upon your household income or your enrollment in a qualifying social welfare program), and the TCM Lifeline Program account must be in your name. You are responsible for notifying TCM if you no longer meet the applicable eligibility standards for the TCM Lifeline Program within five (5) days of becoming aware of such ineligibility. In the event TCM determines that you are no longer eligible for the TCM Lifeline Program, TCM will notify you that your service will be discontinued thirty (30) days after you are provided notice unless you contact TCM within that timeframe to notify TCM that it is in error. You will then have thirty (30) additional days to submit evidence that you still meet the applicable TCM Lifeline Program requirements. If you advise TCM that you no longer qualify for the TCM Lifeline Program, TCM will deactivate your TCM Lifeline Program service.

6. Enrollment Form. To receive a phone and service under the TCM Lifeline Program, you must complete the applicable Enrollment Form and self-certify your eligibility in writing under penalty of perjury. If you seek to qualify for the TCM Lifeline Program under the income eligibility standards, you are required to provide written documentation of your household income. You may also be required, from time to time, to provide TCM written documentation of your household income and/or participation in a qualifying federal or state program. You acknowledge and agree that TCM shall retain all such customer certifications and documentation in order to furnish proof of customer eligibility as may be required by applicable law. Further, by completing an Enrollment Form, you consent to the release of your customer information (including financial information) to governing state and federal agencies. This consent survives any termination of your TCM Lifeline Program enrollment.

7. Acceptance of Customer Enrollment. Your submission of an Enrollment Form does not constitute automatic enrollment in the TCM Lifeline Program. TCM has the right, in its sole discretion, to reject any Enrollment Form and/or to review your eligibility status at any time. If you are no longer eligible for the TCM Lifeline Program, TCM may terminate your account and/or change your rate plan to the most favorable rate plan for which you are eligible without prior notice to you. If you misrepresent your eligibility for the TCM Lifeline Program, you agree to pay us the additional amount you would have been charged under the most favorable rate plan for which you are eligible. Further, you acknowledge and agree that TCM Lifeline Program enrollment and acceptance may be limited by TCM's inventory of TCM Lifeline Program phones.

8. Mobile Phone for the TCM Lifeline Program. If TCM accepts your enrollment, you will receive a free TCM Lifeline Program phone that is selected by TCM. Contact TCM customer service to purchase an upgraded phone. If you lose or damage your TCM Lifeline Program phone, contact TCM customer service for replacement phone options and pricing. TCM Lifeline phones are provided "as is" and without warranty.

9. Maximum of One Lifeline Account per Household. You may only receive one Lifeline supported telephone line, be it wireline or wireless, per household. If you or any member of your household receives a Lifeline supported telephone line from any other telephone company at the time of your enrollment, you are obligated to notify your current service provider that you are now on the TCM Lifeline Program. Failure to comply with this requirement is a material breach of these Terms & Conditions and may result in your immediate de-enrollment from the TCM Lifeline Program.

10. Annual Verification Requirement. To remain eligible for the TCM Lifeline Program, you must complete an annual written verification within sixty (60) days of every anniversary of your initial enrollment in the TCM Lifeline Program or you will be de-enrolled.

11. Change of Address. If you move, you agree to notify TCM within 30 days.

12. Non-transferrable. Your TCM Lifeline Program phone and service are non-transferrable. You agree not to give away, resell, or offer to resell them.

13. Blocked Services. TCM reserves the right to block calls and services that are not subsidized by the applicable government programs and/or that are not prepaid for by you. Unauthorized manipulation, modification, adjustment, or repair made to your phone to allow the making of blocked calls shall constitute a violation of these Terms & Conditions.

14. Rollover. Unless required by applicable law, unused minutes will not be rolled over to subsequent months. Contact TCM customer service for details.

15. Termination for Non-Usage. In the event that you do not use your TCM Lifeline Program phone for sixty (60) days, TCM will de-enroll you from the TCM Lifeline Program.

16. Termination for Breach. In the event that you breach these Terms & Conditions, TCM reserves the right to immediately de-enroll you from the TCM Lifeline Program.

17. Discontinuation of the TCM Lifeline Program. TCM reserves the right to discontinue its Lifeline Program at anytime upon prior notice to you.

18. Returns. You may cancel your TCM Lifeline Program enrollment by returning your phone and calling customer service to de-enroll within fifteen (15) days of receiving your TCM Lifeline Program phone. Upon de-enrolling, you will not receive any refund.

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EXHIBIT F Copy of the Lifeline customer program enrollment form

Channel ID: _____
(If Applicable)**LIFELINE PROGRAM FOR THE STATE OF OHIO**

To apply for Lifeline through Total Call Mobile, please complete this form and submit it to the address at the bottom of the form. For more information or assistance, call 1-800-661-7391. **When you submit this application, you must include the supporting documentation indicated below. Supporting documentation will not be returned.**

1. CUSTOMER INFORMATION

First Name: _____ Last Name: _____

Home Address: _____ City: _____ State: _____ Zip Code: _____
(P.O. Box NOT sufficient)

Home Address: ☐ Permanent ☐ Temporary Date of Birth (MM/DD/YYYY): _____

Billing Address, if different from above: _____ City: _____ State: _____ Zip Code: _____
(P.O. Box IS sufficient)

Last 4 Digits of SSN: _____ Public Aid Case Number (if applicable): _____

Phone Number: (_____) - _____ - _____ E-mail: _____

2. PROGRAM-BASED ELIGIBILITY

To qualify for Lifeline, you must complete either this Section or Section #3 below. Check all program(s) that the person in Section #1 is enrolled in. **If you are qualifying for Lifeline under this Section (i.e. by being enrolled in at least one of the following programs), you must provide current proof of program participation with this application.** If any member of your household is a National School Lunch participant, you can check the box for that program.

- | | |
|--|--|
| <input type="checkbox"/> Federal Public Housing / Section 8 | <input type="checkbox"/> Ohio Works First |
| <input type="checkbox"/> General / Disability Assistance | <input type="checkbox"/> SNAP (formerly known as Federal Food Stamp Program) |
| <input type="checkbox"/> Low Income Home Energy Assistance Program | <input type="checkbox"/> SSI - Blind and Disabled (SSDI) |
| <input type="checkbox"/> Medicaid / Medical Assistance | <input type="checkbox"/> Supplemental Security Income |
| <input type="checkbox"/> National School Lunch Program (free program only) | <input type="checkbox"/> Temporary Assistance for Needy Families Program |

3. INCOME-BASED ELIGIBILITY

To qualify for Lifeline, you must complete either this Section or Section #2 above. To qualify based upon your household income, the income of all your household members must be less than the amount indicated in the table below. If your household size is greater than 8, the maximum annual household income to qualify for Lifeline is the income indicated for 8 household members plus \$5,940 for each additional household member.

Household Members: (check the box which applies)	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6	<input type="checkbox"/> 7	<input type="checkbox"/> 8	___ Specify
Maximum Annual Household Income:	\$16,755	\$22,695	\$28,635	\$34,575	\$40,515	\$46,455	\$52,395	\$58,335	\$ _____
Customer Annual Household Income: \$ _____									

If you qualify for Lifeline under this Section, attach the prior year's state or federal tax return for each household member or your most recent statements of income from the following sources:

- | | |
|---|--|
| - Divorce Decree / Child Support Documents | - Unemployment / Workers' Compensation Benefits Statements |
| - Paystubs (most recent three consecutive months) | - Veterans Administration Benefits Statements |
| - Retirement / Pension Benefit Statements | - W2 Statements |
| - Social Security Benefits Statements | |

Continued on Next Page

4. LIFELINE PLAN SELECTION

Please check the box for the monthly plan that you would like to sign up for (you may change your plan at the end of any month by calling 1-800-661-7391):

- ☐ PLAN 1 (150 minutes including select international calls for free)
- ☐ PLAN 3 Unlimited Talk & Text for \$26.49 (regularly \$39.99)
- ☐ PLAN 2 (250 domestic minutes for free)
- ☐ PLAN 4 Unlimited Talk, Text & Data for \$36.49 (regularly \$49.99)

5. MULTIPLE HOUSEHOLDS AT THE SAME ADDRESS

- ☐ If you reside at an address occupied by multiple households, including adults who do not contribute income to your household and/or share in your household's expenses, please contact Total Call Mobile and you will be provided an additional form to complete. I certify that I reside at an address occupied by multiple households and have completed an additional form.

6. ACTIVATION AND USAGE REQUIREMENTS

Total Call Mobile Lifeline Plans are a prepaid service. When you receive your phone, contact Total Call Mobile at 611 to activate. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes, answering an in-bound call from someone other than Total Call Mobile, or by responding to a direct contact from Total Call Mobile confirming that you want to continue receiving Lifeline service with Total Call Mobile. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to customer service) subject to a 30-day cure period during which you can contact Total Call Mobile to confirm that you want to continue receiving Lifeline service from Total Call Mobile.

By signing and initialing each box below, I affirm that the information contained on this form is true and correct under penalty of perjury:

7. SIGNATURE _____

(Required)

Date: _____

- _____

The information contained within this enrollment form is true and correct. I further acknowledge that Lifeline is a federal benefit program and that providing false or fraudulent statements or documentation in order to receive Lifeline is punishable by law, including fines, imprisonment, de-enrollment, or being barred from the Lifeline program.
- _____

I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility as required by this enrollment form.
- _____

I understand that Lifeline is only available for one landline or one wireless phone per household (not both); a violation of this requirement would constitute a violation of law and would result in my de-enrollment from the Lifeline program.
- _____

My household is not already receiving Lifeline service from another company. I certify that I am the head of my household and understand that, for the purposes of the Lifeline program, a household is an individual or group of individuals who live together at the same address and share the same income and expenses.
- _____

I understand that I may be required to verify my continued eligibility for the Lifeline program at any time and that failure to do so will result in de-enrollment.
- _____

The address listed in this form is my primary residence, not a second home or a business. If I move to a new address, I will notify Total Call Mobile within 30 days. If I checked "Temporary" address in Section 1 above, I acknowledge that I must recertify my address every 90 days.
- _____

I will notify Total Call Mobile within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria, I begin receiving more than one Lifeline benefit, or another member of my household starts receiving a Lifeline benefit. I understand that I may be subject to penalties if I fail to follow this requirement.
- _____

I authorize Total Call Mobile to access my records in order to verify eligibility as required by federal or state agencies. I understand that my information (specifically, my full name, address, date of birth and the last four digits of my social security number) will be transmitted to administrators managing state and/or federal databases.
- _____

Lifeline is not transferable. I will only use this phone for my family's own use and will not resell it, or give it to others.
- _____

In addition, I acknowledge that Lifeline enrollment may be terminated by Total Call Mobile in the event that federal or state Lifeline Programs are changed or terminated, if I no longer qualify for Lifeline, If Total Call Mobile discontinues its Lifeline participation, if I do not use the Lifeline phone for 60 days, or if I breach the terms and conditions at totalcallmobile.com/lifeline.

Please mail this application, with supporting documentation to:

Total Call Mobile, Lifeline Program

1411 W. 190th Street, Suite 700, Gardena, CA 90248

EXHIBIT G Copy of proposed advertising language and materials to advertise Lifeline



Free Mobile Phone and Free Service



Through the government-supported Lifeline program, you may qualify for free service. See inside for details. This is a state of Ohio brochure.

Lifeline Plans

For more information or to sign up, call 1-800-661-7391.

If you qualify for the Lifeline program in the state of Ohio, you can choose from the Lifeline Plans below. All of Total Call Mobile's Lifeline Plans have the following features:

- A free phone (provided by Total Call Mobile). Call customer service for upgrade options.
- Free customer service calls.
- Free voicemail and caller id.
- Free 911 and balance inquiry calls.
- For additional minutes, text messages, or international calls, load an "Anytime Plan" refill as described on the back of this brochure or call customer service.

Plan 1: 150 minutes per month (for domestic & select international calls)

- 150 minutes per month (for domestic & select international calls) at no cost to you.
- Plan minutes expire after 30 days.
- Additional minutes are \$0.10 per minute.
- Text messages are \$0.05 per text.
- For details on select international calls that have no extra charges, see the back of this brochure.

Plan 2: 250 minutes per month (for domestic calls)

- 250 minutes per month (for domestic calls) at no cost to you.
- Plan minutes expire after 30 days.
- Additional minutes are \$0.10 per minute.
- Text messages are \$0.05 per text.
- No international calls are included in this plan.

Plan 3: Discounted Plans (discount varies by state)

- You can purchase the Unlimited Talk & Text plan for \$26.49 (regularly \$39.99 for 30 days) or the Unlimited Talk, Text & Data plan for \$36.49 (regularly \$49.99 for 30 days). For plan details, see the back of this brochure. Please call customer service for additional information or to select this option.
- No international calls are included in these plans.

Lifeline Eligibility

Eligibility criteria varies by state. For the state of Ohio, you are eligible for Lifeline if you participate in one of these programs:

Federal Public Housing / Section 8	Ohio Works First
General / Disability Assistance	SNAP (formerly known as Federal Food Stamp Program)
Low Income Home Energy Assistance Program	SSI - Blind and Disabled (SSDI)
Medicaid / Medical Assistance	Supplemental Security Income
National School Lunch Program (free program only)	Temporary Assistance for Needy Families

You also qualify for Lifeline in the state of Ohio, if your income is less than 150% of the Federal Poverty Guidelines.

Number in Household	Household Annual Income
1	\$16,755
2	\$22,695
3	\$28,635
4	\$34,575

For details or to determine if you qualify, call us at 1-800-661-7391. Only one person per household may sign up for Lifeline. If your Lifeline Plan is not used for sixty (60) days, it will be terminated.

Lifeline Terms & Conditions

Comprehensive terms and conditions for the Total Call Mobile ("TCM") Lifeline Plans are available at www.totalcallmobile.com. All terms and conditions of service as described herein and on the reverse of this brochure apply to services provided under the Lifeline Plans. Customers understand and agree that by signing up for a Lifeline Plan with Total Call Mobile, they may not have a Lifeline plan with any other carrier (wireless or landline) and further agree to comply with any documentation or verification necessary to confirm that they qualify for Lifeline. In addition, Customer acknowledges that Lifeline Plan enrollment may be terminated at anytime by TCM in the event that the federal or state Lifeline Programs are changed or terminated, if Customer no longer qualifies for Lifeline, if TCM discontinues its Lifeline Plans, or if Customer breaches the terms and conditions. TCM, at its sole discretion, will determine whether or not a Customer is eligible for a Lifeline Plan. To remain qualified for a Lifeline Plan, Customer must successfully complete an annual verification. If Customer fails to complete annual verification within sixty (60) days of the required verification date, Customer will be de-enrolled from the Lifeline Plan. Customer agrees not to give away, resell, or offer to resell the TCM Lifeline phone or service. TCM Lifeline Plans are supported by the government assistance "Lifeline" program. Proof of eligibility is required, such as eligible program card or statement of benefits. If you willfully make false statements in order to obtain a TCM Lifeline Plan, you can be punished by fine or imprisonment or can be barred from the program.

EXHIBIT H Detailed process used to ensure only one Lifeline benefit/phone per household

Total Call will take thorough precautions at the outset to ensure that only one Lifeline phone is provided per household. Total Call will convert addresses to common format (e.g., 1st, becomes First) in order to prevent duplicate Lifeline benefits being awarded to one household, which will be an overriding system check. Total Call will also interface with any database or database administrator established by the FCC and/or the Public Utility Commission of Ohio as part of the efforts to prevent duplicate Lifeline benefits in any given household.


EXHIBIT I Certification of Hideki Kato, COO of Total Call Mobile, Inc.

State of California)
)
County of Los Angeles)

Certification

Personally appeared before the undersigned, an officer duly authorized to administer oaths, Hideki Kato, who first being duly sworn, deposes and states that he is the COO of Total Call Mobile, Inc., Applicant in this application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of his knowledge and belief.

Dated: 6/5/2012



Hideki Kato, COO

Subscribed and sworn to before me this 5th day of June 2012.

(Notary Seal)



(Signature of person authorized to administer oath)

My Commission Expires: 6/27/2012

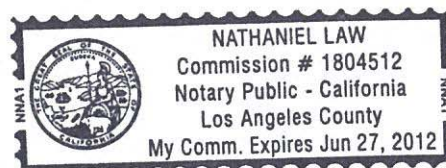


EXHIBIT J Foreign Corporation Certification

200605200156

DATE:	DOCUMENT ID	DESCRIPTION	FILING	EXPED	PENALTY	CERT	COPY
02/21/2006	200605200156	FOREIGN LICENSE/FOR-PROFIT (FLF)	125.00	100.00	.00	.00	.00

Receipt

This is not a bill. Please do not remit payment.

CORPORATION SERVICE COMPANY
ATTN: LISA VAIDO
887 SOUTH HIGH STREET
COLUMBUS, OH 43206

**STATE OF OHIO
CERTIFICATE**

Ohio Secretary of State, J. Kenneth Blackwell

1601163

It is hereby certified that the Secretary of State of Ohio has custody of the business records for
TOTAL CALL MOBILE, INC.

and, that said business records show the filing and recording of:

Document(s):

FOREIGN LICENSE/FOR-PROFIT

Document No(s):

200605200156

Authorization to transact business in Ohio is hereby given, until surrender, expiration or
cancellation of this license.



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 17th day of February, A.D. 2006.

J. Kenneth Blackwell
Ohio Secretary of State



Prescribed by **J. Kenneth Blackwell**

Ohio Secretary of State
Central Ohio: (614) 466-3910
Toll Free: 1-877-SOS-FILE (1-877-767-3453)

www.state.oh.us/sos
e-mail: busserv@sos.state.oh.us

Expedite this Form: (Select One)

Mail Form to one of the Following:

- ☐ Yes PO Box 1390
Columbus, OH 43216
*** Requires an additional fee of \$100 ***
- ☐ No PO Box 670
Columbus, OH 43216

**FOREIGN CORPORATION APPLICATION FOR LICENSE
OR REGISTRATION OF CORPORATION NAME**
(For Foreign Profit or Non-Profit)

THE UNDERSIGNED HEREBY STATES THE FOLLOWING:

(CHECK ONLY ONE (1) BOX)

(1) Foreign Corporation <input checked="" type="checkbox"/> For Profit (151-FLF) <input type="checkbox"/> Non-Profit (152-FLN) ORC 1703	(2) Registration of Corporate Name by Unlicensed Foreign Corporation <input type="checkbox"/> Original (158-RCO) <input type="checkbox"/> Renewal (172-RNR (RCR)) ORC 1703
Filing Fee \$125.00	Filing Fee \$50.00 (Registration No.)

Complete the general information in this section for the box checked above.

Corporate Name Total Call Mobile, Inc.

Under the Laws of the State of Delaware
(Home State)

Date of Incorporation in Home State August 11, 2005
(Date)

The corporation's principal office is located at

707 Wilshire Boulevard, 12th Floor

(Street)

NOTE: P.O. Box Addresses are NOT acceptable.

Los Angeles

(City)

California

(State)

90017

(Zip Code)

The corporate privileges it proposes to exercise in the state of Ohio are as follows: (Please provide a brief but specific description; a general purpose clause is not sufficient)

To provide Telecommunications Services

The corporation is carrying on or doing business.

☐ Check here if additional provisions are attached

Complete the information in this section if box (1) is checked.

The corporation hereby appoints the following as its statutory agent upon whom process against the corporation may be served in Ohio

CSC-Lawyers Incorporating Service (Corporation Service Company)

(Name)

50 West Broad Street, Suite 1800

(Street)

NOTE: P.O. Box Addresses are NOT acceptable.

Columbus

(City)

Ohio

(State)

43215

(Zip Code)

The entity above irrevocably consents to service of process on the agent listed above as long as the authority of the agent continues, and to service of process upon the OHIO SECRETARY OF STATE if:

- A. the agent cannot be found or
- B. the above listed fails to designate another agent when required to do so, or
- C. the above stated registration to do business in Ohio expires or is cancelled.

Complete the information in this section if profit is checked in box (1).

The application is made to secure a ☒ permanent ☐ temporary license

The corporation's principal office within Ohio is to be located in

☒ Corporation will not have an office in Ohio

(Street)

NOTE: P.O. Box Addresses are NOT acceptable.

(City)

(County)

Ohio

(State)

(Zip Code)

Has the corporation obtained a license to transact business in Ohio at any time in the past?

☐ Yes

☒ No

If yes, prior License No. _____

issued _____

(Date)

The date on which the corporation began transacting business in Ohio

☐ Date _____

OR

☒ Will begin business upon approval of application

Is this application being made to enable the corporation to prosecute or defend a legal action?

☐ Yes

☒ No

Complete the information in this section if non-profit is checked in box (1).

The location of its principal office in the state of Ohio is

(Street)

NOTE: P.O. Box Addresses are NOT acceptable.

(City)

(County)

Ohio

(State)

(Zip Code)

(Pursuant to ORC 1703.27 must have an Ohio address)

SS.

IN WITNESS WHEREOF, the corporation has caused this application to be executed by an authorized

officer on February 16, 2006
(Date)

STATE OF California

COUNTY OF Los Angeles

Mark Leafstedt, being first duly sworn, deposes and says that he ~~she~~ is the
(Name of Officer)

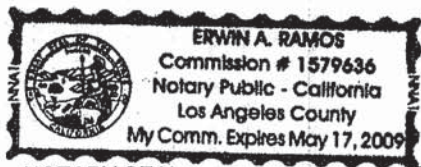
President of Total Call Mobile, Inc.
(title)

the corporation described in the foregoing application, and that the statements contained in said application are true and correct to the best of my knowledge and belief.

Signature: Mark Leafstedt

Name: Mark Leafstedt

Sworn to before me and subscribed in my presence,



NOTARY SEAL

FEB 14, 2006
(date)
Erwin A. Ramos
(Notary Public)

Expiration date of Notary's Commission: 5.17.2009
(date)

Delaware

PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "TOTAL CALL MOBILE, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE SEVENTEENTH DAY OF FEBRUARY, A.D. 2006.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE NOT BEEN ASSESSED TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "TOTAL CALL MOBILE, INC." WAS INCORPORATED ON THE ELEVENTH DAY OF AUGUST, A.D. 2005.



4014308 8300

060151905

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

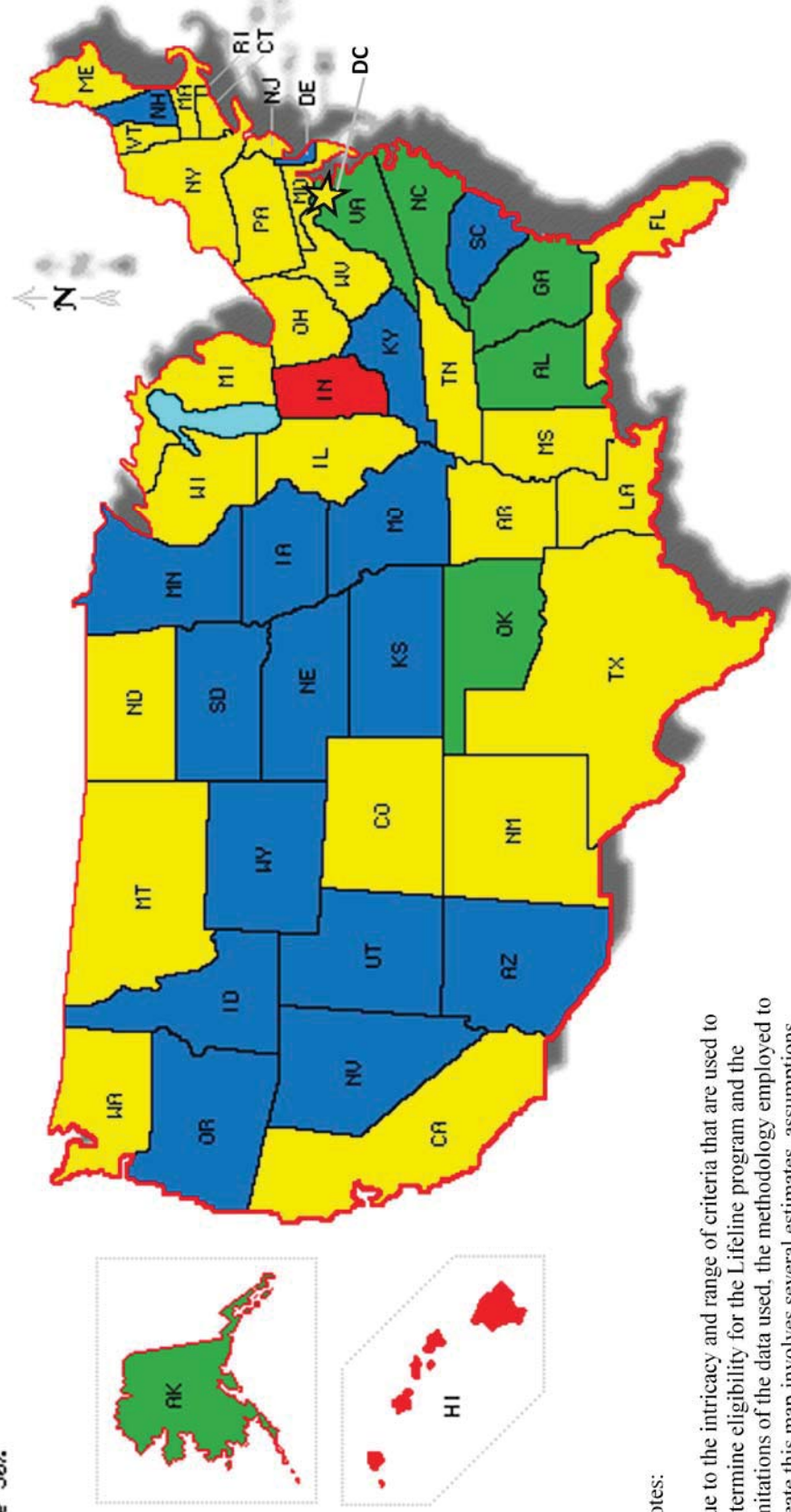
AUTHENTICATION: 4531509

DATE: 02-17-06

EXHIBIT K 2010 Lifeline Participation Rates by State

- Below 10%
- 10% - 20%
- 20% - 50%
- Above 50%

2010 Lifeline Participation Rates by State



Notes:

Due to the intricacy and range of criteria that are used to determine eligibility for the Lifeline program and the limitations of the data used, the methodology employed to create this map involves several estimates, assumptions, simplifications, and omissions. Therefore, the rates generated on this map should be treated as estimates only.

EXHIBIT L Wire Centers

CLLI

RCCKOHXA
GENVOHXA
ASHTOHXD
JFSAOHXA
ASHTOHXA
ASHTOHXC
ASBGOHXA
KGVLOHXA
CNNTOHXA
ANDVOHXA
ORWLOHXA
ASHTOHXA
ASHTOHXC
GENVOHXA
KGVLOHXA
RCCKOHXA
SPNTOH37
BURLOHXA
HLBOOH39
LYBGOHXA
BRNVOHXA
FRFTOHXA
GNFDOHXA
RNBOOH36
LUVLOHXA
MRSHOH46
CLBGOHXA
KGTNOHXA
MSVLOHXA
RCDLOHXA
CHLCOHXA
PTMOOHXA
BEVROHXB
GLADOHXA
JCSNOHXA
PKTNOHXA
WLTNOHXA
WVRLOHXA
NLVLOH75
GLPLOH44
RIGROH24
THPLOHXA
COOLOHXA
GUVLOHXA

Wire Center

ROCK CREEK
GENEVA
ASHTABULA
JEFFERSON
ASHTABULA
ASHTABULA
AUSTINBURG
KINGSVILLE
CONNEAUT
ANDOVER
COLEBROOK
ASHTABULA
ASHTABULA
GENEVA
KINGSVILLE
ROCK CREEK
IRONTON
CHESAPEAKE
HILLSBORO
LYNCHBURG
BOURNEVILLE
FRANKFORT
GREENFIELD
RAINSBORO
PORTSMOUTH
MARSHALL
CLARKSBURG
KINGSTON
MASSIEVILLE
RICHMONDALE
CHILLICOTHE
PORTSMOUTH
BEAVER
JACKSON
JACKSON
PIKETON
WELLSTON
WAVERLY
NELSONVILLE
GALLIPOLIS
RIO GRANDE
THE PLAINS
COOLVILLE
GUYSVILLE

COOLOHXA
SHNDOHSH
CHVTOHCH
CNCNOHSP
MMTPOHMM
SVMLOHSM
TRENOH98
MTGMOHMO
MLFROHMF
MONROH53
MRRWOHXA
MTHTOHMH
NRWDOHNW
NWMDOHNR
RSMYOHRO
SLBNOHXA
STBROHSB
TBSCOHTO
WCHSOHWC
NSTROHXB
RSBGOHXA
VRSLOHXA
YRKSOHXA
PHBGOHXA
EATNOHXA
ELDROHXA
NWPROHXA
WALXOHXA
WMCHOHXA
TRWDOHXA
MDTWOH42
MMBGOH86
NWLBOHXA
TPCYOHXA
TROYOHXA
WMTNOHXA
BTKNOHXA
FLTCOH99
SDNYOHXA
HRSNOHHR
CNCNOHCD
CNCNOHNS
CNCNOHPH
CNCNOHWD
CNCNOHWS
GRHLOHNG

COOLVILLE
SHANDON
CINCINNATI
CINCINNATI
CINCINNATI
SEVEN MILE
TRENTON
CINCINNATI
LITTLE MIAMI
MONROE
MORROW
CINCINNATI
CINCINNATI
CLERMONT2
MASON
SOUTH LEBANON
CINCINNATI
CLERMONT2
BETHANY
NORTH STAR
ROSSBURG
VERSAILLES
YORKSHIRE
PHILLIPSBURG
EATON
ELDORADO
NEW PARIS
WEST ALEXANDRIA
WEST MANCHESTER
TROTWOOD
MIDDLETOWN
MIAMISBURG-W CARROLLTON
NEW LEBANON
TIPP CITY
TROY
WEST MILTON
BOTKINS
FLETCHER-LENA
SIDNEY
HARRISON
CINCINNATI
CINCINNATI
CINCINNATI
CINCINNATI
CINCINNATI
CINCINNATI

CNCNOHHW
EVDLOHEV
FKLNOH01
FRFDOHFF
GLDLOHGD
GRSBOHGR
GSHNOHGS
HMTNOHHM
RILTOHCS
CMDNOHXA
DYTNOH26
DYTNOH27
DYTNOH89
ENWDOHXA
FRVLOHXA
GMTWOHXA
GRTSOHXA
LBRTOHXA
PLHLOHXA
CNCNOHMW
CHGVOHCG
CNCNOHAV
CNCNOHHP
HMLTOHHT
FTLROHXA
HNVIOHXA
JKCTOHXA
WMFDOHXA
RDWYOHXA
WLBTOHXA
MTVCOHXA
GNVLOHXA
ANSOOHXA
ARCNOHXA
BKVLOHXA
BRFROHXA
GTBGOHXA
LAUROHXA
PIQUOH77
ANNAOHXA
BLBKOH84
CRBGOH85
DGRFOHXA
DNVLOH88
NHHNOH96
NWCROH84

CINCINNATI
CINCINNATI
FRANKLIN
HAMILTON2
CINCINNATI
CINCINNATI
LITTLE MIAMI
OXFORD
CINCINNATI
CAMDEN
DAYTON
DAYTON
VANDALIA
ENGLEWOOD
FARMERSVILLE
GERMANTOWN
GRATIS
LIBERTY
PLEASANT HILL
CINCINNATI
CINCINNATI
CINCINNATI
CINCINNATI
CLERMONT2
FORT LORAMIE
HUNTSVILLE
JACKSON CENTER
WEST MANSFIELD
RIDGEWAY
WEST LIBERTY
MOUNT VICTORY
EATON
ANSONIA
ARCANUM
BROOKVILLE
BRADFORD
GETTYSBURG
LAURA
PIQUA
ANNA
BELLBROOK
CHRISTIANSBURG
DE GRAFF
DONNELSVILLE
NORTH HAMPTON
NEW CARLISLE

ZMMNOH42
BLCTOHXA
BLLFOHXA
CDVLOH76
CTWBOHXA
PTCHOH26
SCTNOH46
SPFDOH32
SPFDOH39
SSLNOH88
SVINOH56
YESPOH76
URBNOHXA
ELBLOHXA
MCBGOHXA
TRRHOHXA
WDSTOHXB
JMTWOH67
DYTNOH29
BWRVOH45
CNTMOH43
DYTNOH22
DYTNOH23
DYTNOH25
ENONOH86
FRBNOH87
LWBGHXA
SPVYOH86
XENIOH37
CLVLOHXB
FVPWOH88
LBNNOHXA
LVLDHLO
MASNOHXA
WYVLOHXA
WLBGOHXB
BATVOHBA
FYVLOHXA
MTOROHXA
HSVLOHXA
WLMGOHXB
BLCHOHXA
MTVIOHXA
NWXNOHXA
PTWLOHXB
SABNOHXA

BEAVERCREEK
BELLE CENTER
MANSFIELD
CEDARVILLE
CATAWBA
PITCHIN
SOUTH CHARLESTON
SPRINGFIELD
SPRINGFIELD
SOUTH SOLON
SOUTH VIENNA
YELLOW SPRINGS-CLIFTON
URBANA
EAST LIBERTY
MECHANICSBURG
TERRE HAUTE
WOODSTOCK
JAMESTOWN
DAYTON
BOWERSVILLE
DAYTON
MIDDLETOWN
DAYTON
DAYTON
ENON
DAYTON
LEWISBURG
SPRING VALLEY
XENIA
CLARKSVILLE
CENTERVILLE(MNTGMRY CO)
LEBANON
SOUTH LEBANON
MASON
WAYNESVILLE
WILLIAMSBURG
CLERMONT2
FAYETTEVILLE
MT ORAB
HAMERSVILLE
WILMINGTON
BLANCHESTER
MARTINSVILLE
NEW VIENNA
PORT WILLIAM
SABINA

LSBGOHXA
CSTLOH68
LORNOHXB
LORNOHXC
LORNOHXD
LORNOHXE
LYTPOH25
MNTROH25
MOTLOH25
MPHGOH66
HURNOHXA
MILNOHXA
INDPOH52
NOLMOH77
NRTNOH23
ELYROHXA
NRVLOHXA
CLSTOHXA
ECLDOH73
KRLDOH25
MYHGOH44
NRFDOHXA
RSSLOHXA
BNBGOHXA
NWBYOHXA
MDSNOHXA
PRRYOHXA
THSNOHXA
CRLDOHXA
GRNEOHXA
MLFDOHXC
HTBGOHXA
MSPTOHXA
PRMNOHXA
JHTNOHXA
KNMNOHXA
LORNOHXA
LKWDOH52
NETNOHXA
HIRMOHXA
LYKNOHXA
NWTNOHXA
MOVLOHXA
GLINOHXA
JHVLOHXA
MRNGOHXA

LEESBURG
CASTALIA
LORAIN
LORAIN
LORAIN
LORAIN
LEROY
MENTOR
MENTOR
MONTROSE(CUYAHOGA CO)
HURON
MILAN
INDEPENDENCE
TRINITY
NORTH ROYALTON
ELYRIA
ELYRIA
COLUMBIA STATION
CLEVELAND
KIRTLAND
HILLCREST
NORTHFIELD
RUSSELL
BAINBRIDGE(GEAUGA CO)
NEWBURY
MADISON
PERRY
THOMPSON
CORTLAND
GREENE
MIDDLEFIELD
HUNTSBURG
MESOPOTAMIA
PARKMAN
JOHNSTON
KINSMAN
LORAIN
CLEVELAND
NORTH EATON
HIRAM
LYKENS
NEW WASHINGTON
MONROEVILLE
GALION
JOHNSVILLE
MARENGO

MTGLOHXA
NWCHOHXA
CHVLOHXA
CLDNOHXA
CRDGOHXA
ATTCOHXA
BCYROHXA
CRLNOHXA
CTFDOHXA
SHLBOHXA
WLRDOHXA
BLLVOHXA
BLNGOH35
NFFDOHXB
NRWLOHXA
WKMNOHXA
MNFDOHXD
BLVLOHXA
BTLROHXA
LUCSOHXA
LXTNOHXA
MNFDOHXA
MNFDOHXB
MNFDOHXC
WLDROHXA
SVNHOHXB
GNWCOHXA
RDHWOHXB
ASLDOHXB
HYVLOHXA
LDVLOHXA
POLKOHXA
PYVLOHXA
NWLNOHXA
BRHMOHXA
AMHROHXA
AMHROHXB
BLHNOHXB
OBRLOHXA
LGRNOHXA
LGRNOHXA
CNGROHXA
BRBNOHXB
CETNOHXA
HMOVIOHXA
LODIOHXA

MOUNT GILEAD
NEW WINCHESTER
CHESTERVILLE
CALEDONIA
CARDINGTON
ATTICA
BUCYRUS
CRESTLINE
CHATFIELD
SHELBY
WILLARD
BELLEVUE
BLOOMINGVILLE
NORWALK
ASHLAND
WAKEMAN
MANSFIELD
BELLVILLE
BUTLER
LUCAS
LEXINGTON
RITTMAN
MANSFIELD
MANSFIELD
MANSFIELD
SAVANNAH
GREENWICH
REDHAW
ASHLAND
HAYESVILLE
LAKEVILLE
POLK
PERRYSVILLE
NEW LONDON
BIRMINGHAM
AMHERST
AMHERST
BERLIN HEIGHTS
OBERLIN
ELYRIA
ELYRIA
CONGRESS
BURBANK
CRESTON
HOMERVILLE
LODI

MDBROHXA
SEVLOHXA
SMVLOHXA
SPNCOHXA
STNGOHXA
WSLMOHXA
NSVLOHXA
BGPROHXA
APCKOHXA
FRBGOHXA
SHRVOHXA
WSTROHXA
AVLKOHXA
AVONOHXA
AVONOHXB
BEREOH23
BKPKOH26
BKPKOH97
CLEVOH25
CLEVOH63
VLCYOHXA
BRWKOHXA
GFTNOHXA
MEDNOHXB
SHCTOHXA
WSWOOHXA
RCFDOHXA
HNCKOHXA
RCFDOHXA
CNFLOH01
DLTNOH82
MNC SOH88
MRVLOHXA
MSLNOH02
ORVLOHXA
RTMNOHXA
DYTWOHXA
DYTWOHXA
BLVROHXA
BRWSOHXA
KDRNOHXA
NVRROH87
STBGOHXA
MTRSOHXA
AKRNOH25
AKRNOH72

WOOSTER
SEVILLE
SMITHVILLE
SPENCER,OH
STERLING
WEST SALEM
NASHVILLE
BIG PRAIRIE
APPLE CREEK
FREDERICKSBURG
SHREVE
GLENMONT
AVON LAKE
AVON
AVON
BEREA
CLEVELAND
CLEVELAND
CLEVELAND
CLEVELAND
VALLEY CITY
BRUNSWICK
GRAFTON
MEDINA
SHARON CENTER
WADSWORTH
RICHFIELD
HINCKLEY
RICHFIELD
CANAL FULTON
DALTON
MANCHESTER(SUMMIT CO)
MARSHALLVILLE
MASSILLON
ORRVILLE
RITTMAN
DOYLESTOWN
DOYLESTOWN
BOLIVAR
WILMOT
KIDRON
NAVARRE
STRASBURG
MONTROSE(SUMMIT CO)
GREENSBURG
AKRON

AKRNOH86
BRTNOH74
BRTNOH82
CVTPOH02
CYFLOH92
CLEVOH45
CHFLOH24
BCVLOH52
BCWDOH46
BDFROH23
CLEVOH42
CLEVOH43
CLEVOH53
CLEVOH62
CLEVOH64
CLEVOH74
CLHGOH32
HTVLOH02
AKRNOH78
CNTNOH45
GNBGOH89
MGDROH62
NCTNOH49
NINDOH48
PRHGOH47
PNSLOHXA
UNTWOH69
KENTOH67
STOWOH68
TLMDOH63
HDSNOHXA
PNSLOHXA
HDSNOHXA
MGNLOH86
NWPHOHXA
AURROHXA
BRTOOH83
GRVLOHXA
MNTUOH27
STBOOH62
WNHMOHXA
NBENOHXA
ALNCOH82
ECTNOH48
ERCHOHXA
LSVLOH87

AKRON
AKRON
AKRON
AKRON
CLEVELAND
CHAGRIN FALLS
BRECKSVILLE
TERRACE
BEDFORD
CLEVELAND
CLEVELAND
CLEVELAND
CLEVELAND
CLEVELAND
CLEVELAND
CLEVELAND
HARTVILLE
AKRON
CANTON
GREENSBURG
MOGADORE
NORTH CANTON
CANTON
CANTON
PENINSULA
UNIONTOWN
KENT,OH
AKRON
AKRON
NORTHFIELD
PENINSULA
NORTHFIELD
MAGNOLIA-WAYNESBURG
NEW PHILADELPHIA
AURORA
BURTON
GARRETTSVILLE
MANTUA
KENT,OH
WINDHAM
NORTH BENTON
ALLIANCE
CANTON
EAST ROCHESTER
LOUISVILLE

MRBOOH93
NGTWOHXA
PARSOHXA
SBNGOH93
ATWROH94
LKMLOHXA
RTTWOH32
RVNNOH02
WYLDHXA
WRRNOHXA
NWFLOHXA
BRCTOHXA
LRTWOHXB
LVBGOHXA
NJSNOH53
LSBNOH42
HVTNOHXA
POLDOH75
CLBNOH48
CNFDOH02
DMSCOHXA
LTNAOH02
NLIMOH54
NWMLOH54
NWWTOH45
SALMOH33
WINOOHXA
BIVLOHXA
BRFDOH44
HBRDOH02
LRTPOH75
NILSOH65
WRRNOHXB
WRRNOHXF
WRRNOHXG
YNTWOH79
BDMNOH75
LLVLOH53
STRTOH75
YNTWOH74
YNTWOH78
RGRSOH22
ELVROH38
EPLSOH42
SND SOH62
OLFLOH23

MARLBORO
NORTH GEORGETOWN
PARIS
SEBRING
ATWATER
LAKE MILTON
ROOTSTOWN
RAVENNA
WAYLAND
CORTLAND
NEWTON FALLS
BERLIN CENTER
WARREN
WARREN
NORTH JACKSON
LISBON
HANOVERTON
YOUNGSTOWN
COLUMBIANA
CANFIELD
DAMASCUS
LEETONIA
NORTH LIMA
NORTH LIMA
NEW WATERFORD
SALEM
WINONA
BRISTOLVILLE
SHARON,OH
HUBBARD
GIRARD
NILES
WARREN
WARREN
WARREN
YOUNGSTOWN
YOUNGSTOWN
LOWELLVILLE,OH
YOUNGSTOWN
EAST LIVERPOOL
GIRARD
ROGERS
EAST LIVERPOOL
EAST PALESTINE,OH
SANDUSKY
OLMSTED FALLS

PNVLOH35
RKRVOH33
SCLDOH72
SECLOH38
SGVLOH23
SHHGOH92
SHLKOHXA
SOLNOH24
ELYROHxD
HIRMOHXA
TWBGOHXA
WRRNOHxE
ELYROHXA
VRMLOHXA
ELYROHxB
ELYROHxE
NRFD0HXA
PARMOH88
WLGHOH94
WSLKOH87
BNBGOHXA
RSSLOHXA
CHRDOHXA
MDSNOHXA
MLFDOHXC
PRRYOHXA
NLBGOHXA
RCWDOHXA
MGSP0HXA
MYVIOHXA
OSTROHxB
PRSP0HXA
RDNROHXA
RTHBOHXA
RYMNOHXA
YRCT0HXA
GRCMOHXA
LARUOHXA
MARNOHXC
MRRLOHXA
KLBROHXA
MARNOHxB
WALDOHXA
MLCT0HXA
LOND0H85
PLWDOHXA

PAINESVILLE
CLEVELAND
CHESTERLAND
CLEVELAND
STRONGSVILLE
CLEVELAND
LORAIN
CHAGRIN FALLS
ELYRIA
HIRAM
TWINSBURG
WARREN
ELYRIA
VERMILION
ELYRIA
ELYRIA
NORTHFIELD
VICTORY
WILLOUGHBY
NORTH EATON
BAINBRIDGE(GEAUGA CO)
RUSSELL
CHARDON
MADISON
MIDDLEFIELD
PERRY
NORTH LEWISBURG
RICHWOOD
MAGNETIC SPRINGS
MARYSVILLE
OSTRANDER
PROSPECT
RADNOR
RATHBONE
RAYMOND
YORK CENTER
GREEN CAMP
LA RUE
MARION
MORRAL
KILBOURNE
MARION
WALDO
MILFORD CENTER
LONDON
RESACA

SDLIOH87
NWRMOH66
HLRDOH87
HRBGOH87
MTSTOHXA
PNCYOHXA
WJSNOH87
CHSDOHXA
DBLNOH89
DLWROHXA
WOTNOH88
CLMBOH29
CLMBOH11
CLMBOH23
CLMBOH25
CLMBOH26
CLMBOH27
CLMBOH44
CLMBOH47
GVCYOH87
UPAROH45
UPAROH48
ASHYOHXA
SNBYOHXB
CRTOOHXA
ALXNOHXA
CNBGOHXA
JHTWOHXA
NWALOH85
PTSKOHXA
WEVLOH88
GRVIOHXA
GRVIOHXA
CLMBOH86
HBRNOHXA
MLPTOHXA
PSVLOHXA
RUVLOH53
THVLOH24
NWRKOHXD
HETHOHXA
FRTWOHXA
NWRKOHXB
MTVROHXA
UTICOHXA
STLSOHXA

SEDALIA
ALTON
HILLIARD
HARRISBURG
MOUNT STERLING
PLAIN CITY
WEST JEFFERSON
CHESHIRE CENTER
DUBLIN
MARION
WORTHINGTON-ATT
COLUMBUS
COLUMBUS
COLUMBUS
COLUMBUS
COLUMBUS
COLUMBUS
GAHANNA
GROVE CITY
COLUMBUS
COLUMBUS
ASHLEY
SUNBURY
CROTON
ALEXANDRIA
CENTERBURG
JOHNSTOWN
NEW ALBANY
PATASKALA
COLUMBUS
GRANVILLE
GRANVILLE
REYNOLDSBURG
HEBRON
MILLERSPORT
PLEASANTVILLE
RUSHVILLE
THORNVILLE
NEWARK
NEWARK
FREDERICKTOWN
NEWARK
MOUNT VERNON
UTICA-HOMER
ST LOUISVILLE

NWRKOHXB
NWRKOHXC
MDVLOH94
BMBGOH43
JFVLOH42
NHLDOH49
WACHOH33
CRVLOHXA
WLPTOHXB
AHVLOHXA
AMDAOHXA
CNWIOH83
CRRLOH75
LCKBOH49
BLTMOHXA
LNCSOH65
BRMNOHXA
DANKOHXA
GMBROHXA
MRBGOHXA
HNVROHXA
NWRKOHXA
NWRKOHXD
GRTTOHXA
HNVROHXA
STLSOHXA
GRTTOHXA
EGTNOHXA
FLRDOHXA
JEWLOHXA
NEY OHXA
NPLNOHXA
GRTNOHXA
EVPTOHXA
CDWROHXA
OHCYOHXA
WBSHOHXA
WLSHOHXA
SCTTOHXA
ATWPOHXA
CNVYOHXA
PAYNOHXA
VNWROHXA
PLNGOHXA
PLNGOHXA
CELNOHXA

NEWARK
NEWARK
MILLEDGEVILLE
BLOOMINGBURG
JEFFERSONVILLE
NEW HOLLAND
WASHINGTON COURT HOUSE
CIRCLEVILLE
WILLIAMSPORT
ASHVILLE
AMANDA
GROVEPORT
CARROLL
LOCKBOURNE
BALTIMORE
LANCASTER
BREMEN
DANVILLE
GAMBIER
MARTINSBURG
HANOVER
FULTONHAM
NEWARK
GRATIOT
HANOVER
ST LOUISVILLE
GRATIOT
EDGERTON
FLORIDA
JEWELL
NEY
NAPOLEON
GRELTON-MALINTA
EVANSPORT
COLDWATER
OHIO CITY
WABASH
WILLSHIRE-WREN
SCOTT
ANTWERP
CONVOY
PAYNE
VAN WERT
PAULDING
PAULDING
CELINA

MRSTOHXA
BRYNOHXA
DFNCOHXA
SHWDOHXA
OTVLOHXA
DLPHOHXA
MDPNOHXA
MNDNOHXB
SNVLOHXA
VNDCOHXA
OTVLOHXA
OTVLOHXA
CODLOHXA
ARTHOHXA
OKWDOHXA
AYVLOHXA
AYVLOHXA
CODLOHXA
WPKNOHXA
MNSTOHXA
BCLDOHXA
NWBMOHXA
NWKNOHXA
STMYOHXA
CRIDOHXA
WPKNOHXA
CRIDOHXA
GLNDOHXA
CNTLOHXA
MLLCOHXA
GLNDOHXA
KALDOHXA
NRCKOHXA
NWBVOHXA
NWBVOHXA
KALDOHXA
NWBVOHXA
CARAOHXA
ELIDOHXA
FTJNOHXA
VGVLOHXA
VGVLOHXA
FTJNOHXA
FTRCOHXA
GOMROHXA
HCVLOHXA

MARIA STEIN
BRYAN
DEFIANCE
SHERWOOD
OTTOVILLE
DELPHOS
MIDDLE POINT
MENDON
SPENCERVILLE
VENEDOCIA
OTTOVILLE
OTTOVILLE
CLOVERDALE
ARTHUR
OAKWOOD
AYERSVILLE
AYERSVILLE
CLOVERDALE
PAYNE
MINSTER
BUCKLAND
NEW BREMEN
NEW KNOXVILLE
ST MARYS
CRIDERSVILLE
PAYNE
CRIDERSVILLE
GLANDORF
CONTINENTAL
MILLER CITY
GLANDORF
KALIDA
NORTH CREEK
NEW BAVARIA
NEW BAVARIA
KALIDA
NEW BAVARIA
CAIRO
ELIDA
DELPHOS
VAUGHNSVILLE
VAUGHNSVILLE
DELPHOS
FORT RECOVERY
GOMER
HICKSVILLE

LIMAOHXB
RCFROHXA
BNRGOHXA
GVHLOHXA
JENROHXB
OTWAOHXA
PNDROHXA
RWSNOHXB
BNRGOHXA
BNRGOHXA
BNRGOHXA
LFYTOHXA
LIMAOHXA
WMNSOHXA
WYFDOHXA
HLGTOHXA
LPSCOHXA
MCCMOHXB
VNBROHXA
KNTNOHXA
KNTNOHXA
HRPSOHXA
NEVDOHXA
UPSNOH29
MHVLOHXA
MTBLOHXB
VANLOHXA
WHTNOHXB
SYCMOHXA
SYCMOHXA
FSTAOH43
NWRGOH59
TFFNOH44
ADA OHXA
ALGROHXA
BFTNOHXA
BVRDOHXA
CMGVOHXA
DNKROHXA
FORSOHXA
CARYOHXA
ARCDOHXA
ARTNOHXA
BSVLOHXA
FNDYOH42
OKLNOHXA

LIMA
ROCKFORD
BENTON RIDGE
GROVER HILL
JENERA
OTTAWA
GILBOA
RAWSON
BENTON RIDGE
BENTON RIDGE
BENTON RIDGE
LAFAYETTE
VAN WERT
WESTMINISTER
WAYNESFIELD
HOLGATE
LEIPSIC
MCCOMB
VAN BUREN
KENTON
KENTON
HARPSTER
NEVADA
UPPER SANDUSKY
MCCUTCHEENVILLE
MOUNT BLANCHARD
VANLUE
WHARTON
SYCAMORE
SYCAMORE
FOSTORIA
NEW RIEGEL
TIFFIN
ADA
ALGER
BLUFFTON
BEAVERDAM
COLUMBUS GROVE
DUNKIRK
FOREST
CAREY
ARCADIA
ARLINGTON
BETTSVILLE
FINDLAY
OKOLONA

RGCROHXA
FRVWOHXA
MRTWOHXA
FRVWOHXA
MRTWOHXA
BRILOHXA
MNJTOH53
SBVIOH26
SBVIOH28
SCVIOH69
TLVLOHXA
TOROOH53
MTPLOHXA
EDONOHXA
FYTTOHXA
CHFDOHXA
MCCROHXA
GDRPOHXA
MTMOOHXA
DELTOHXA
ELMROHXA
FRMTOH33
GBBGOHXB
GENOOHXA
HLNAOHXA
CONYOHXA
MOLNOHXA
HLLDOH11
HSKNOHXB
LBCTOHXA
LCKYOHXA
LYNSOHXA
MAUMOH11
LNDSOH66
CTISOHXA
CRTCOHXA
MRBLOHXA
ARCHOHXA
NBLTOHXA
RSNGOHXA
GRSPOHXA
WAYNOHXA
BMDLOHXA
BWLGOHXA
CYGTOHXA
CLYDOHXA

WAUSEON
FAIRVIEW
MORRISTOWN
FAIRVIEW
MORRISTOWN
BRILLIANT
MINGO JUNCTION
STEUBENVILLE
STEUBENVILLE
ST CLAIRSVILLE
TILTONSVILLE
TORONTO
MONTPELIER
EDON
FAYETTE
CHESTERFIELD
MCCLURE
GRAND RAPIDS
METAMORA
DELTA
ELMORE
FREMONT
GIBSONBURG
GENOA
HELENA
COONEY
MOLINE
HOLLAND
HASKINS-TONTOGANY
LIBERTY CENTER
LUCKEY
LYONS
MAUMEE
LINDSEY
PORT CLINTON
CURTICE-OREGON
MARBLEHEAD
ARCHBOLD
NORTH BALTIMORE
RISINGSUN
GREEN SPRINGS
WAYNE-BRADNER
BLOOMDALE
BOWLING GREEN
CYGNET
CLYDE

PINROHXA
STRYOHXA
WUNTOHXA
MCCROHXA
WTVLOHXA
SYVNOHXB
RCCTOHXA
SWTNOHXA
SYVNOHXA
TOLDOH38
ORGNOH69
PMVLOHXB
PRBGOH14
PRBGOH66
PRTGOHXA
STRGOHXA
TOLDOH21
WSTNOHXA
PTBYOHXA
OKHROHXB
TOLDOH47
TOLDOH53
WASNOHXA
WHHSOH87
TOLDOH72
TOLDOH40
PCTNOHXA
PCTNOHXB
WDVLOHXA
DRSDOH75
ADVLOHXA
ZNVLOH45
BYVLOHXA
CMBROHXB
NWCNOHXA
RSVLOH69
LTHCOHXA
CLWLOHXA
LWLLOHXA
MRTTOH37
OLWSOHXA

PIONEER
STRYKER
WEST UNITY
MCCLURE
WATERVILLE
SYLVANIA
RICHFIELD CTR-BERKEY
SWANTON
SYLVANIA
TOLEDO
TOLEDO
PEMBERVILLE
PERRYSBURG
TOLEDO
PORTAGE
STONY RIDGE
TOLEDO
WESTON
PUT-IN-BAY
OAK HARBOR
TOLEDO
TOLEDO
WAUSEON
WHITEHOUSE
TOLEDO
TOLEDO
PORT CLINTON
PORT CLINTON
WOODVILLE
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in

Case No(s). 12-1883-TP-UNC

Summary: Application Application of Total Call Mobile, Inc.
for Designation as a Low-Income Competitive Eligible Telecommunications Carrier

Part 1 (Application and Exhibits A-L)
electronically filed by Heather Kirby on behalf of Total Call Mobile, Inc.