

notify it of the requests. SafetyNet claims that, at the time of revocation, it had no customers in Wisconsin. Additionally, the company states that due to changes in the Lifeline program and slowing expansion within the state due to Covid, it chose not to seek redesignation in Wisconsin. Staff did not find evidence of there being issues in any other state.

SafetyNet receives revenue from its business as a CETC, selling top-up minutes and participation in the ACP. As a Lifeline only CETC in Ohio, SafetyNet indicates that it will not seek universal service funds for high-cost support. SafetyNet’s compliance plan was approved by the FCC on December 26, 2012, and is attached to its application as Exhibit J. Marketing and advertising materials that the company intends to use in Ohio are also included within this exhibit.

Within the public interest statement included in its application, SafetyNet suggests that its designation as a Lifeline only CETC is in the public interest in that it provides more service choices for Ohio consumers, provides consumers with service mobility that allows them to use the service both inside and outside of the home, aids consumers in acquiring and maintaining employment, allows for family communication and enables consumers to better participate in day-to-day activities. SafetyNet attests that its service will remain functional in emergency situations as the underlying networks have sufficient back-up power to maintain service without external power sources as well as the ability to reroute traffic around damaged facilities and to manage traffic spikes. Access to 9-1-1 service will be made available through SafetyNet’s contracts with its underlying carriers. Handsets are 9-1-1 and E9-1-1 compliant.

SafetyNet offers two Lifeline service plans as set forth below:

Lifeline 1000 Talk & Unlimited Text with 25MB Data	
Retail	\$15.25
Federal Lifeline Subsidy	\$5.25
Company Lifeline discount	\$10.00
Customer Pays	\$0.00

Lifeline 350 Talk & Unlimited Text with 4.5GB Data	
Retail	\$30.25
Federal Lifeline Subsidy	\$9.25
Company Lifeline discount	\$6.00
Customer Pays	\$15.00

Additionally, the company offers a third plan under the ACP.

SafetyNet's Lifeline service will be provided on a month-to-month basis with no contract obligation to the customer. Each service plan requires payment of a \$25 activation fee and, if service is terminated, a \$25 reactivation fee will apply to maintain the same telephone number. If a customer accepts a new telephone number, no reactivation fee will be required. Both plans include voice mail, call waiting, call forwarding and three-way calling. SafetyNet will not assess any roaming charges as the handsets are not capable of roaming. Additionally, the cost of a handset begins at \$50; however, customers may use their own handsets if they are compatible with the network.

SafetyNet will market its service via email, web and social networking and outdoor signage promoting Lifeline. SafetyNet states that its outdoor signage will also indicate that Lifeline service is a government program that is limited to one benefit per household and will provide instructions for enrollment. SafetyNet further attests that it will follow all federal requirements regarding customer eligibility and verification, including the use of the National Lifeline Accountability Database to ensure that multiple benefits are not provided.

In accordance with 47 U.S.C. §214(e)(2), upon request and consistent with the public interest, convenience and necessity, the PUCO may designate a requesting carrier meeting the requirements of 47 U.S.C. 214, 47 C.F.R. 54.201(d) and 47 C.F.R. 54.202 as a competitive eligible telecommunications carrier (CETC). Ohio Adm. Code 4901:1-6-09 sets forth the Commission's rules for the designation of CETCs in Ohio.

After reviewing SafetyNet's application, staff sent multiple data requests for supplemental information and/or missing documentation. On August 12, August 22, August 29 and December 6, the company provided all information and documentation requested by staff. Following its review of the application and the subsequently provided information and materials, staff finds that the application meets all the requirements set forth in the statute and rules cited above. Therefore, staff recommends that SafetyNet's application for designation as a low-income competitive eligible telecommunications carrier be approved.

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Summary: Staff Review and Recommendation electronically filed by Mrs. Tanika
Hawkins on behalf of Public Utilities Commission of Ohio