

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Global Connection Inc. of America	)	
d/b/a Stand Up Wireless	)	
	)	Docket No. 11-0579
Application for Designation as an Eligible	)	
Telecommunications Carrier	)	

**AMENDED APPLICATION OF  
GLOBAL CONNECTION INC. OF AMERICA D/B/A STAND UP WIRELESS  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

Global Connection Inc. of America d/b/a Stand Up Wireless (“Stand Up Wireless”) respectfully submits to the Illinois Commerce Commission (the “Commission”) this Amended Application for Designation as an Eligible Telecommunications Carrier (“ETC”) for purposes of receiving Universal Services Support pursuant to Section 214(e)(2) of the Telecommunications Act of 1996 (“1996 Act”), 47 U.S.C. § 214(e)(2), and Section 54.201 of the Rules of the Federal Communications Commission (“FCC”), 47 C.F.R. § 54.201. Stand Up Wireless seeks ETC designation to receive support from the Federal Universal Service Fund (“FUSF”) and to offer “Lifeline” support only to its qualifying customers. Additionally, Stand Up Wireless respectfully requests that the Commission grant this Application expeditiously, so that low-income customers in Illinois can benefit from the variety of high-quality calling plans provided by Stand Up Wireless without any unnecessary delay.

**I. BACKGROUND**

**A. Stand Up Wireless.**

Stand Up Wireless provides in numerous other states, and will provide in Illinois upon ETC designation, wireless services on a common carrier basis, offering customers a choice of minute plans at flat rates without requiring a fixed-term contract or a credit check. Global

Connection Inc. of America d/b/a Stand Up Wireless is a Georgia corporation with its principal offices located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Stand Up Wireless' Articles of Organization are on file with the Commission in Docket No. 11-0322. Stand Up Wireless is authorized to do business in Illinois under its legal name "Global Connection Inc. of America." On June 2, 2011, Stand Up Wireless was granted a Certificate of Authority to provide resold prepaid commercial mobile radio service throughout the State of Illinois. See Docket No. 11-0322.

**B. Prior ETC Filings in Illinois.**

Applications for ETC designation on a wireline basis were previously filed on behalf of Global Connection Inc. of America on May 14, 2001 in Docket No. 07-0323 and November 30, 2009 in Docket No. 09-0586, and applications for ETC designation on a wireless basis were previously filed on behalf of Global Connection Inc. of America d/b/a Stand Up Wireless on April 5, 2011 in Docket No. 11-0328, and on August 10, 2011 in this Docket.

The application in Docket No. 07-0323 was filed on behalf of Global Connection Inc. of America by Mr. Houssam Abdallah, its then president and owner. Mr. Abdallah sold his interest in Global Connection Inc. of America in June, 2008, and has had no involvement with Global Connection Inc. of America since the end of the 2008 calendar year. The current management of Stand Up Wireless has no direct knowledge of the history of the activities in Docket No. 07-0323, beyond what is present in the public record. According to the public record Global Connection Inc. of America voluntarily withdrew its application by oral motion on June 13, 2007, and intended at that time to re-file at some date in the future. The transcript of the status hearing shows that the application, which was prepared internally, contained errors and inconsistencies which the Staff indicated would make it difficult, if not impossible, to properly review the application.

Global Connection Inc. of America also voluntarily withdrew its application in Docket No. 09-0586 by motion granted October 12, 2010. During the pendency of this proceeding, Staff for the Commission raised several issues with regard to the application, including issues relating to Global Connection Inc. of America's handling of municipal telecom taxes under the Municipal Telecommunications Tax Act, as well as its processing of federal, state and local taxes. Subsequent to the withdrawal of its application in Docket No. 09-0586, Global Connection Inc. of America implemented a new billing system, H2O. H2O is a leading telecommunications Software-as-a-Service platform utilizing comprehensive taxing tables and methodologies compliant with all federal, state and local laws for the jurisdictions in which it operates. With respect to the application filed in Docket No. 09-0586, the Staff voiced concerns regarding whether Global Connection Inc. of America met the requirements for ETC designation, including demonstration of its ability to remain functional in emergency situations, commitments to consumer protection and service quality standards, and offering of a local usage plan comparable to those offered by the incumbent LECs. As detailed herein, Global Connection Inc. of America meets the requirements for ETC designation, including the issues raised by the Staff in Docket No. 09-0586.

Stand Up Wireless' application in Docket No. 11-0328 was withdrawn without prejudice by motion granted July 8, 2011. Stand Up Wireless' motion to withdraw was filed with the intent to refile an application which more thoroughly addressed the prior ETC filings with the Commission, and addressed some additional concerns raised by the Staff during its review of the application in Docket No. 11-0328.

The application initially filed in this Docket represents Stand Up Wireless' refiling. Since Stand Up Wireless' initial application was filed in this Docket the FCC has instituted a

number of changes to the low-income programs of the USF through its adoption of the USF/ICC Transformation Order<sup>1</sup>, as further clarified by the USF/ICC Order on Reconsideration<sup>2</sup>, and the Lifeline Reform Order.<sup>3</sup> Stand Up Wireless is committed to complying with the requirements for ETC designation as revised in the FCC's orders, as detailed in this Amended Application.

### **C. Designation of Eligible Telecommunications Carriers.**

Sections 214(e) and 254 of the 1996 Act expressly authorize the Commission to designate Stand Up Wireless as an ETC. 47 U.S.C. §§ 214(e), 254. More specifically, Section 214(e)(2) of the 1996 Act provides that, upon request and consistent with the public interest, convenience, and necessity, the Commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC, provided the requesting carrier: (i) offers services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services. 47 U.S.C. § 214(e)(I). In its First Report and Order implementing Sections 214(e) and 254, the FCC sets forth the services a carrier must provide in order to be designated as an ETC

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<sup>1</sup> 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 an 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. 01-92, 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”).

<sup>2</sup> 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 an 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. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (“USF/ICC Order on Reconsideration”).

<sup>3</sup> 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 Reform Order”).

and, thus, receive FUSF. Federal State Joint Ed on Universal Srv., Report and Order, 12 FCC Red 8776, 8809-25 (1997). The FCC's rules, as well as Part 757 of the Commission's rules, impose additional requirements on a common carrier seeking designation as an ETC. 83 Ill. Adm. Code § 757. As demonstrated below, Stand Up Wireless satisfies each of these requirements.

Stand Up Wireless is in the process of seeking ETC status in several states including Illinois.

**D. Scope of Stand Up Wireless Designation Request.**

Section 214(e)(2) of the 1996 Act provides that ETC designations shall be made for a "service area" designated by the state commission. Stand Up Wireless seeks ETC designation in Illinois for the purpose of receiving available low-income support from the FUSF in exchanges consisting of the non-rural wire centers throughout the Illinois Bell Telephone Company ("Illinois Bell"), Frontier North and Verizon South service territories as reflected on **Attachment "A"** attached hereto and incorporated herein by reference. **Attachment "A"** contains lists of the wire centers within those coverage areas. In areas served by a non-rural company, such as AT&T, Frontier North, and Frontier South, the state commission may establish an ETC service area for a competitor without federal concurrence. 47 U.S.C. § 214(e)(5). Section 54.207 of the FCC's rules define a "service area" as a "geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms." 47 C.F.R. § 54.207(a). For service areas served by non-rural ILECs, there are no restrictions on how a commission defines the "service area" for purposes of designating a competitive ETC. Because Stand Up Wireless seeks to provide service in Illinois in only non-rural service areas and because Stand Up Wireless seeks ETC designation in Illinois solely to enable it to provide low-cost support, Stand Up Wireless seeks this limited ETC designation for the service area previously

defined. For the reasons set forth below, designating Stand Up Wireless as an ETC throughout the requested service areas would serve the public interest, convenience and necessity.

## **II. STAND UP WIRELESS SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC IN ILLINOIS**

As demonstrated below, Stand Up Wireless meets the applicable requirements under the FCC Rules for receiving ETC designation by the Commission pursuant to Section 214(e)(2) of the 1996 Act. In addition, Stand Up Wireless complies with the standards established by the FCC for determining whether applicants for ETC status serve the public interest. Because Stand Up Wireless is not seeking high-cost support and because it seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline services to eligible customers, submission of a Five-Year Network Improvement is not required.

### **A. Stand Up Wireless Offers the Services and Functionalities Supported by the Federal Low-Income Universal Service Program [47 C.F.R. § 54.201(d)].**

Section 214(e)(1)(A) of the Act<sup>4</sup> requires an ETC to offer the services that are supported by federal universal service support mechanisms under section 254(c). Effective December 29, 2011, pursuant to the USF/ICC Transformation Order as further clarified by the USF/ICC Order on Reconsideration, the FCC eliminated its former list of nine supported services and amended section 54.101(a) of its rules to specify that “voice telephony service” is supported by the federal universal service mechanisms. The amended Section 54.101(a) and its list of supported services reads as follows:

§ 54.101 Supported services for rural, insular and high cost areas.

(a) Services designated for support. Voice telephony service shall be supported by federal universal service support mechanisms. The functionalities of eligible voice telephony

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<sup>4</sup> 47 U.S.C. § 214(e)(1).

services include voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation for qualifying low-income consumers (as described in subpart E of this part).

Upon designation as an ETC in Illinois, and consistent with state and federal policies favoring universal service, Stand Up Wireless will offer voice telephony services as described in the amended Section 54.101 of the FCC Rules.<sup>5</sup> To the extent that the Commission continues to require ETCs to provide those services supported by federal universal service support mechanisms previously enumerated in 47 C.F.R. § 54.101(a), Stand Up Wireless commits to continue to satisfy state voice service requirements.<sup>6</sup>

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and enhanced 911 ("E911") where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets. Stand Up Wireless also commits to remit 911 revenues to local authorities. The Company commits to pay in a timely manner all applicable federal, state and local regulatory fees, including but not limited to universal service and E911 fees.<sup>7</sup>

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<sup>5</sup> 47 C.F.R. §§ 54.101(a).

<sup>6</sup> USF/ICC Transformation Order at ¶ 82.

<sup>7</sup> See TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition, FCC Docket No. 96-45 (May 3, 2010).

Stand Up Wireless will not provide toll limitation service (“TLS”), which allows low-income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.<sup>8</sup>

Additionally, Stand Up Wireless offers its customers access to operator services, interexchange service and directory assistance through Stand Up Wireless’ own facilities.<sup>9</sup>

**B. Stand Up Wireless Will Provide Service through Resale.**

Under Section 214(e)(1)(A) of the Act, an ETC must offer the services supported by federal universal service support mechanisms throughout its designated service area “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”<sup>10</sup> In its Lifeline Reform Order, the FCC decided to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC’s compliance with certain 911 requirements and the ETC’s filing with and approval by the FCC of

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<sup>8</sup> Lifeline Reform Order at ¶ 230.

<sup>9</sup> Prior to the FCC’s issuance of the USF/ICC Transformation Order and USF/ICC Order on Reconsideration, **Stand Up Wireless** offered access to operator services, interexchange service and directory assistance in compliance with 47 C.F.R. §§ 54.101(a)(1)-(9) and Section 214 of the Telecommunications Act. **Stand Up Wireless** recognizes that following issuance of the USF/ICC Transformation Order and USF/ICC Order on Reconsideration, offering access to these services is no longer sufficient to meet the “own facilities” requirement. **Stand Up Wireless** has made the business decision to continue to offer these services to its customers.

<sup>10</sup> 47 U.S.C. § 214(e)(1)(A).

a compliance plan describing the ETC's adherence to certain protections prescribed by the FCC ("Blanket Forbearance").

Stand Up Wireless seeks limited ETC designation in Illinois to participate in the Lifeline program and has opted to pursue Blanket Forbearance. On March 8, 2012, Stand Up Wireless filed its Compliance Plan ("Compliance Plan") with the FCC. Stand Up Wireless' Compliance Plan was approved by the FCC on May 25, 2012. A copy of the Compliance Plan and FCC Approval are attached as **Attachment "B"** hereto and incorporated herein by reference.

**C. Stand Up Wireless Will Advertise the Availability of the Supported Services.**

The FCC adopted specific requirements for Lifeline advertising in its Lifeline Reform Order with which the Company will comply.<sup>11</sup> Within the deadline provided in the Lifeline Reform Order, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) documentation necessary for enrollment; (7) Stand Up Wireless' name (the ETC); and (8) notice that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.<sup>12</sup> These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.<sup>13</sup> This specifically includes the

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<sup>11</sup> Lifeline Reform Order at ¶¶ 275-82.

<sup>12</sup> Lifeline Reform Order at ¶ 275.

<sup>13</sup> Id.

Company's website and outdoor signage.<sup>14</sup>

Stand Up Wireless is fully prepared to and will comply with federal requirements that it advertise the availability of its services throughout its Service Area using media of general distribution.<sup>15</sup> Stand Up Wireless further commits that it will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.<sup>16</sup> Stand Up Wireless advertises the availability and prices of its services through a variety of media. Accordingly, more low-income Illinois residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to Stand Up Wireless' service. A sample of Stand Up Wireless' planned advertising is attached hereto as **Attachment "C"** hereto and incorporated herein by reference.

Stand Up Wireless' advertising will comply with the requirements of Part 757 of the Commission's rules. 83 Ill. Adm. Code § 757.

### **III. ADDITIONAL ELIGIBILITY CRITERIA**

The additional requirements for designation of ETCs were recently amended by the FCC. Effective April 2, 2012, 47 C.F.R. § 54.202 imposes a number of changed requirements in order to be designated an ETC under Section 214(e)(6). Stand Up Wireless will comply with the requirements of 47 C.F.R. § 54.202, effective April 2, 2012.

#### **A. Stand Up Wireless Will Comply with Service Requirements.**

Per the requirements of 47 C.F.R. § 202(a)(1)(i) Stand Up Wireless certifies that it will comply with the service requirements applicable to the low-income support it receives as a result

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<sup>14</sup> Id.

<sup>15</sup> 47 C.F.R. § 54.201(d)(2).

<sup>16</sup> 47 C.F.R. §§ 54.405(b).

of designation as an ETC for purposes of receiving Lifeline. Stand Up Wireless not only commits to provide service throughout its Service Area, but also commits to provide universal service in a timely manner to all customers who make a reasonable request for service pursuant to the FCC Rules.<sup>17</sup> If designated as a wireless ETC, Stand Up Wireless will provide service throughout its Service Area through a combination of its own facilities and the resale of services. Stand Up Wireless is willing to accept carrier of last resort obligations throughout the universal service areas in which Stand Up Wireless is designated as an ETC by the Commission.

**B. Consumer Protection.**

*Customer Proprietary Network Information*

Stand Up Wireless will satisfy all consumer privacy protection standards as provided in 47 C.F.R. § 64, Subpart U as applicable and will protect Customer Proprietary Network Information (“CPNI”) as required by state and federal law and will certify compliance with the same on an annual basis.

*Consumer Code for Wireless Service*

Stand Up Wireless certifies that it will comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3).

Stand Up Wireless remains committed to Illinois’ consumer protection and service quality in Parts 730, 731, 732 and 735 of the Commission’s rule as agreed to in its certification docket (Docket No. 11-0322). In addition, Stand Up Wireless hereby agrees that in the provision of wireless service, it will comply with the applicable provisions of Part 736 of the

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<sup>17</sup> 47 C.F.R. § 54.202(a)(1) also requires the submission of a five-year plan demonstrating how high-cost universal service support will be used to improve the ETC’s coverage, service quality and capacity. This requirement, however, is inapplicable to this application, since **Stand Up Wireless** is not seeking high-cost assistance.

Commission's rules, or as order by the Commission. In addition, Stand Up Wireless will use its best efforts to resolve complaints received by the Commission, and designates the following contact person to work with Commission Staff to resolve any complaints or other compliance matters:

Gina Robinson  
Manager of Compliance  
678.714.6298  
grobins@globalconnectioninc.com

#### *General Compliance*

Stand Up Wireless commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's USF Order.<sup>18</sup> Stand Up Wireless in general commits to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

#### **C. Service Quality.**

As a reseller of other carriers' wireless services, Stand Up Wireless is able to offer service of the same quality and reliability as the underlying vendors. Stand Up Wireless cannot guarantee that customers will never experience service disruptions, however, Stand Up Wireless' underlying carrier agreements allow its service to be as reliable as any other wireless service that must deal with atmospheric and other conditions that sometimes result in dropped calls.

Further, under the FCC Rules, an ETC applicant must demonstrate its ability to remain functional in emergency situations.<sup>19</sup> Since Stand Up Wireless is providing service to its customers through the use of facilities obtained from other carriers it is able to provide to its

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<sup>18</sup> Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776 at ¶ 4 (1997) ("USF Order").

<sup>19</sup> 47 C.F.R. § 54.202(a)(2).

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

**D. Fiscal and Technological Capability.**

Stand Up Wireless has the financial and technical capability to provide Lifeline service. As part of the Lifeline Reform Order, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.<sup>20</sup> Stand Up Wireless satisfies these criteria.

**E. Plan Disclosure.**

The terms and conditions of its voice telephony service plans offered to Lifeline subscribers are detailed on pages 19-20 of the Compliance Plan attached hereto as **Attachment “B”** and on the Terms of Service attached hereto as **Attachment “D”** attached hereto and incorporated herein by reference.

**F. Stand Up Wireless Will Comply With the Lifeline Certification and Verification Requirements of 47 C.F.R. § 54.410.**

Stand Up Wireless will comply with the uniform eligibility criteria established in new section 54.409 of the FCC Rules.<sup>21</sup> Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; (2) the household’s participation in one of the federal assistance programs listed in new section 54.409(a)(2); or (3) meeting eligibility criteria

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<sup>20</sup> Lifeline Reform Order at ¶ 387.

<sup>21</sup> 47 C.F.R. § 54.409 (effective June 1, 2012).

established by Illinois for its residents, provided such criteria are based solely on income or factors directly related to income per new section 54.409(a)(3) of the FCC Rules. In addition, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

Stand Up Wireless will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Lifeline Reform Order, together with any additional state certification requirements.<sup>22</sup> Consistent with federal requirements, Stand Up Wireless requires customers to certify at the time of service activation and annually thereafter that they: 1) are the head of household; 2) participate in one of the state-approved means tested programs; 3) will be receiving Lifeline-supported services only from Stand Up Wireless; 4) do not currently receive Lifeline support; and 5) will notify Stand Up Wireless in the event that they no longer participate in the qualifying program.

If Stand Up Wireless has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.<sup>23</sup> A demonstration of eligibility must comply with the annual verification procedures found in Section 54.410(f), including the submission of a certification form.<sup>24</sup>

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<sup>22</sup> Lifeline Reform Order at ¶61; 47 C.F.R. § 54.410(a).

<sup>23</sup> Lifeline Reform Order at ¶ 143; 47 C.F.R. § 54.405(e)(1).

<sup>24</sup> 47 C.F.R. §54.410 (effective April 2, 2012).

Furthermore, Stand Up Wireless commits to comply with the FCC's 60-day non-usage policy, as described in the Lifeline Reform Order.<sup>25</sup>

#### **IV. STAND UP WIRELESS WILL COMPLY WITH ALL ANNUAL REPORTING REQUIREMENTS.**

Consistent with the requirements of 47 C.F.R. § 54.422 (effective April 2, 2012), Stand Up Wireless will comply with the following annual reporting requirements:

##### **A. Detailed Information on any Outage.**

As required by 47 C.F.R. § 54.422(b)(1), Stand Up Wireless will report, on an annual basis, “any outage in the prior calendar year, as that term is defined in 47 C.F.R. 4.5, of at least 30 minutes in duration” that potentially affects 1) at least ten percent of the end users served in a designated service area; or 2) a 911 special facility. The report will include 1) the date and time of the onset of the outage; 2) a brief description of the outage and its resolution; 3) the particular services affected 4) the geographic areas affected; 4) the steps taken to prevent a similar situation in the future; and 5) the number of customers affected.

##### **B. Number of Complaints per 1,000 Connections.**

Consistent with the requirements of 47 C.F.R. § 54.422(b)(2), Stand Up Wireless will annually report the number of complaints received by Stand Up Wireless from the FCC, this Commission, or the Better Business Bureau, per 1,000 connections.

##### **C. Compliance with Applicable Service Quality Standards and Consumer Protection Rules.**

As required by 47 C.F.R. § 54.422(b)(3), Stand Up Wireless will certify its continuing compliance with all applicable service quality standards and consumer protection rules.

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<sup>25</sup> Lifeline Reform Order at ¶¶ 257-63.

**D. Certification That Stand Up Wireless is Able to Function in Emergency Situations.**

Consistent with the requirement of 47 C.F.R. § 54.422(b)(4), Stand Up Wireless will certify, on an annual basis, its continued ability to remain functional in emergency situations.

**E. Voice Telephony Service Plans.**

Consistent with the requirement of 47 C.F.R. § 54.422(b)(5), Stand Up Wireless will annually provide information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including (i) the number of minutes provided, (ii) additional charges, if any, for toll calls, and (iii) rates for each plan.

**F. Regulatory Fees.**

Stand Up Wireless pays all applicable federal, state, and local regulatory fees, including but not limited to universal service and E-911 fees, in a timely manner.

**V. DESIGNATING STAND UP WIRELESS AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST**

Designating Stand Up Wireless as an ETC will serve the public interest generally, and the needs of low-income customers in Illinois in particular. Stand Up Wireless has specifically tailored its wireless service plans to share the benefits of wireless telecommunications with underserved customers who have been left behind by other providers. Stand Up Wireless will offer service in Illinois at reduced rates to the low-income customer starting as low as \$0 per initial sixty-eight minutes of use per month, without the typical strings attached (such as credit checks, long-term commitments, and early termination fees) that otherwise prevent many economically disadvantaged customers from obtaining wireless services. Stand Up Wireless is steadily expanding into new communities where the telecommunications needs of consumers are not being met by existing providers.

Stand Up Wireless fulfills a critical role in the marketplace by ensuring that many Americans who cannot qualify for, or afford, the services provided by other wireless providers can still enjoy the benefits of wireless telecommunications. Stand Up Wireless' service model is ideal for many consumers on a limited budget; other carriers often impose hefty overage charges if consumers exceed their usage limit. Many consumers cannot even qualify for service from other providers because of creditworthiness concerns or the inability to commit to a long-term contract.

As a result, Stand Up Wireless' customer base is unlike those of other wireless providers. The usage patterns of these customers also are distinct. These customers use a relatively small number of minutes per month.

These figures reveal that Stand Up Wireless reaches market segments that other carriers have ignored. Designating Stand Up Wireless as an ETC will improve its ability to serve these customers, and thus will serve the public interest.

## **VI. GRANTING THIS PETITION WILL IMPOSE A NEGLIGIBLE BURDEN ON THE USF**

Stand Up Wireless' designation will not burden the USF. It is not seeking high-cost benefits, which recently have been capped. Stand Up Wireless only is seeking low-income funds in the form of Lifeline benefits, and as such Stand Up Wireless will impose a burden on the FUSF that can be characterized as negligible. It is in fact a non-factor in the Commission's analysis.

Stand Up Wireless submits that, if it is designated as an ETC and is able to compete for local exchange customers, it will spur a competitive response from affected ILECs and other carriers as they seek to retain and attract customers. Such a response could include: improved

service quality and customer service; wider local calling areas; bundled service offerings; and lower prices overall.

## **VII. CONCLUSION**

WHEREFORE, pursuant to Section 214(e)(2) of the 1996 Act, Global Connection Inc. of America d/b/a Stand Up Wireless respectfully requests that the Commission enter an order (1) designating Stand Up Wireless as an ETC in Illinois in a manner consistent with this Application, including ETC status for its wireless service offerings in the exchanges listed in **Attachment A** hereto; and (2) for any other relief the Commission deems just.

Dated this 18<sup>th</sup> day of June, 2012.

Respectfully submitted,

GLOBAL CONNECTION INC. OF AMERICA  
D/B/A STAND UP WIRELESS

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