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August 17, 2021

VIA FEDERAL EXPRESS

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
(850) 413-6770

REDACTED

Re: 2021 Annual Lifeline Data Request (i-wireless, LLC)
CONFIDENTIAL TREATMENT REQUESTED

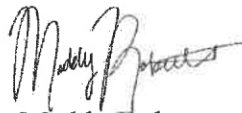
To Whom It May Concern:

i-wireless, LLC (“i-wireless”) hereby files an original and two (2) redacted copies of its responses to the 2021 Annual Lifeline Data Request.

i-wireless hereby requests confidential treatment of certain information identified in Exhibits A and B pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. **A confidential copy of the responses is attached hereto in a separate, sealed envelope.**

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. If you have any questions or need additional information, please do not hesitate to contact me at 770-232-9200 or etc@telecomcounsel.com. Thank you for your attention to this matter.

Sincerely,



Maddy Roberts
Regulatory Specialist
Lance J.M. Steinhart, P.C.
Attorneys for i-wireless, LLC

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CLEC AND WIRELESS LIFELINE DATA REQUEST 2021

To assist the Florida Public Service Commission in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Lifeline program as required by Chapter 364.10, Florida Statutes, **please provide responses to the following questions by August 16, 2021. Your responses should include your company name, contact person, and email address.**

Please answer the following questions as they relate to your company's Florida Lifeline customers, providing data for fiscal year July 1, 2020, through June 30, 2021.

For those items requesting the data be reported monthly, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.

Response: See Confidential Exhibit A

2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision.

Response: See Confidential Exhibit A

3. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision.

Response: See Confidential Exhibit A

4. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers moved to Transitional Lifeline.

Response: See Confidential Exhibit A

5. In accordance with Section 364.105, Florida Statutes, are you offering Transitional Lifeline service? If yes, what is the number of customers participating per month and what are your advertising efforts for Transitional Lifeline service?

Response: i-wireless offers Transitional Lifeline service to former Lifeline customers upon their request, with 0 customers participating. i-wireless does not have advertising efforts specific to Transitional Lifeline service.

6. The number of customers participating in Lifeline under the Tribal Lands provision each month.

Response: See Confidential Exhibit A

7. Description of your company's procedures for Lifeline. Include the following in your response:
- a. Internal procedures for promoting Lifeline.
 - b. Outreach and educational efforts involving participation in community events.
 - c. Outreach and educational efforts involving mass media (newspaper, radio, television).
 - d. Copies of Lifeline outreach materials of your company.
 - e. Any links on your company Web site that provides Lifeline information.
 - f. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Lifeline.

Response: See Confidential Exhibit B.

8. Did your company provide Lifeline services using resale Lifeline lines obtained from an underlying carrier? If yes, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

Response: No, i-wireless did not provide Lifeline services using resale Lifeline lines obtained from an underlying carrier.

9. Please identify how your company is satisfying the FCC's minimum service standards requirement.

Response: i-wireless is satisfying the FCC's minimum service standards by offering a broadband plan consisting of 1,000 Voice Minutes, Unlimited Text Messaging, and 4.5 GB of Data to new customers. i-wireless' grandfathered customers are provided a Voice and Broadband plan consisting of 1,250 Voice Minutes, Unlimited Text Messaging, and 500MB of Data.

10. To the extent you have experienced a decline in Lifeline customers since last year, please list and describe any issues that may have contributed to the decline. Any additional general comments or information you believe will assist staff in evaluating and reporting Lifeline participation in Florida are welcome.

Response: i-wireless has seen a continued decline in Florida subscribers since December of 2016 – primarily due to an intentional slowdown in acquisition of new customers. With the implementation of the FCC's 2016 Lifeline Modernization Order (FCC 16-38), it is becoming increasingly difficult to profitably acquire Lifeline subscribers in a \$9.25 (subsidy) state.

11. Please identify any issues you have experienced utilizing the National Verifier.

Response: Now that the National Verifier has introduced an API to streamline the enrollment process, i-wireless is not currently experiencing any issues utilizing the National Verifier.

12. Are you assisting customers with their Lifeline program applications through the National Verifier portal? If yes, please describe any issues you have experienced. If no, please describe your process for directing customers to apply with the National Verifier.

Response: No, i-wireless is not currently assisting customers with their Lifeline program applications through the National Verifier. If a customer contacts our customer care department or visits our website, they are advised and routed to the National Verifier website to complete their qualification prior to enrolling with Access Wireless.

13. Are the majority of your new Lifeline customers already enrolled in the National Verifier before requesting Lifeline service from your company?

Response: Yes.

14. Since the hard launch of the National Verifier in Florida, how has your company used the customer information received from Florida's Coordinated Enrollment Process?

Response: Due to i-wireless' pending issue with the FCC on the AT&T service area, i-wireless has not been able to enroll any new subscribers since FL has hard-launched with the National Verifier.

15. In the last year, has your company filed for any form of bankruptcy? If yes, please identify the chapter and the date filed.

Response: i-wireless has not filed for any form of bankruptcy.

16. Within the last two years, has your company been involved in any FCC enforcement actions relating to Florida Lifeline customers? If yes, please provide the date and FCC docket number.

Response: i-wireless has not been involved in any FCC enforcement actions.

17. Did you observe an increase in new Lifeline customers related to COVID-19 unemployment? Additionally, please provide or describe any form of promotion your company conducted to customers newly eligible for Lifeline due to COVID-19. Any additional general comments or information on how COVID-19 has affected your Lifeline customers in Florida are welcome.

Response: No, due to i-wireless' pending issue with the FCC on the AT&T service area, i-wireless has not been able to enroll any new subscribers since FL has hard-launched with the National Verifier. After the launch of EBB in May, i-wireless still has not seen an increase in enrollments to EBB from unemployment. Since May, i-wireless has promoted both EBB and Lifeline by agents out in the field, our website, and flyers.

18. Is your company participating in the Emergency Broadband Benefit (EBB) program? If yes, are the majority of your EBB customers in Florida existing Lifeline customers?

Response: Yes, the majority i-wireless' EBB customers are enrolled for Lifeline as well, only about 5% of our EBB customers are not on the Lifeline plan.

EXHIBIT A
PUBLIC VERSION

	Total residential access lines in service	Total End of Period Lifeline customers	New Lifeline customers enrolled	Lifeline customers de-enrolled	Transitional Lifeline Participants	Tribal Lifeline customers
7 2020						
8 2020						
9 2020						
10 2020						
11 2020						
12 2020						
1 2021						
2 2021						
3 2021						
4 2021						
5 2021						
6 2021						

	Total residential access lines in service	Total End of Period Lifeline customers	New Lifeline customers enrolled	Lifeline customers de-enrolled	Transitional Lifeline Participants	Tribal Lifeline customers
7 2019						
8 2019						
9 2019						
10 2019						
11 2019						
12 2019						
1 2020						
2 2020						
3 2020						
4 2020						
5 2020						
6 2020						

Number of customers denied Lifeline service, by category

	NLAD Failures, Invalid Address, Name/DOB Mismatch
7 2020	
8 2020	
9 2020	
10 2020	
11 2020	
12 2020	
1 2021	
2 2021	
3 2021	
4 2021	
5 2021	
6 2021	

EXHIBIT B

PUBLIC VERSION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. www.accesswireless.com/lifeline

[REDACTED]