

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight & Programs Branch**

**RESOLUTION T- 17459
November 6, 2014**

R E S O L U T I O N

Resolution T-17459. This Resolution denies Tempo Telecom, LLC's Advice Letter (AL) 2 requesting designation as an Eligible Telecommunications Carrier to provide only federal Lifeline wireless service in specified areas of California.

Summary

By this Resolution, the California Public Utilities Commission (CPUC or Commission) denies the request of Tempo Telecom, LLC (Tempo) (U-4459-C), a wireless carrier under the brand designation "*Tempo*," to be designated as an Eligible Telecommunications Carrier (ETC) to provide only federal Lifeline wireless service to qualifying customers in California in the service areas of the Uniform Regulatory Framework (URF) carriers¹ excluding the Small Local Exchange Carriers (Small LECs)² service areas.³ Tempo seeks federal Lifeline support only and does not seek California LifeLine fund support.

Background

Congress directed the FCC to establish universal service support mechanisms to ensure that "[q]uality services [are] available at just, reasonable, and affordable rates" for consumers throughout the nation.⁴ The FCC's and the CPUC's Lifeline programs further this goal by providing discounts on monthly telephone services to eligible low-income consumers.

¹ The URF carriers are AT&T California, Verizon California, Surewest Telephone, Frontier Communications of California, and Frontier of the South West.

² The Small LECs group is composed of Calaveras Telephone Co. (U-1004-C), Cal-Ore Telephone Co. (U-1006-C), Ducor Telephone Co. (U-1007-C), Foresthill Telephone Co. (U-1009-C), Happy Valley Telephone Co. (U-1010-C), Hornitos Telephone Co. (U-1011-C), Kerman Telephone Co. (U-1012-C), Pinnacles Telephone Co. (U-1013-C), Ponderosa Telephone Co. (U-1014-C), Sierra Telephone Co. (U-1016-C), Siskiyou Telephone Co. (U-1017-C), Volcano Telephone Co. (U-1019-C), Winterhaven Telephone Co. (U-1021-C), and Frontier Communications West Coast (U-1020-C). These telephone companies generally operate in rural areas and have regulated rates.

³ See Tempo Telecom, LLC's Advice Letter 2 (filed December 5, 2013) and Advice Letter 2A (December 18, 2013).

⁴ 47 U.S.C. § 254(b)(1).

Section 254(e) of the Communications Act, as amended (the Act), states that “only an eligible telecommunications carrier under section 214(e) shall be eligible to receive specific federal universal service support.”⁵

Under section 214(e)(2), state commissions are given the primary responsibility of designating ETCs in their states. Once designated an ETC, the FCC then authorizes the ETC to receive federal USF support for providing those services supported by the Universal Service Fund (e.g. local telephone service) in high-cost areas and to low-income customers.

47 C.F.R. § 54 contains the FCC’s Universal Service rules issued to implement § 254 of the Telecommunications Act regarding universal service. Sections 54.400 – 54.422 address federal Lifeline service. Section 54.401 defines Lifeline as a non-transferrable retail service offering for which qualifying low-income consumers pay a reduced charge for voice telephony service after applying the federal Lifeline support amount.⁶

FCC Orders

The following provides a brief summary of some of the relevant aspects of the FCC orders that address ETC matters:

FCC 12-11 (February 6, 2012), the Lifeline Reform Order, revised the definition of Lifeline service to include technological-neutral terms of service and adopted a rule to permit ETCs to allow qualifying consumers to apply Lifeline discounts to all residential service plans that provide voice telephony service including bundled service packages of voice and broadband or packages with optional calling features. ETCs can apply the Lifeline discount to any retail service offering, not just to offerings specifically designed for low-income consumers.⁷

The FCC declined to prescribe minimum monthly minute standards, finding that it was not necessary because the communications market place should make this determination, citing examples of competitive forces driving up the number of minutes offered to Lifeline customers.⁸ While the FCC has not prescribed minimum minutes of use for Lifeline plans, Communications Division (CD) staff reviews an ETC applicant’s proposed plans to determine if they are based on retail offerings of the ETC applicant that are available to its non-Lifeline customers or if the plans are offered only to Lifeline customers. For those Lifeline plans that are not based on retail plans available to all prospective customers, CD staff evaluates the Lifeline customer-only plans in its public interest analysis of each ETC request.

⁵ 47 U.S.C. § 254(e).

⁶ 47 C.F.R. § 54.403.

⁷ *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 Dkt. 11-42, WC Dkt. 03-109, CC Dkt. 96-45, WC Dkt. 12-23 (FCC 12-11) rel. Feb 6, 2012 (*Lifeline Reform Order*) ¶¶ 315-316.

⁸ *Id.* at ¶ 50.

California Public Utilities Commission ETC Designation Requirements

The following are the CPUC requirements that a carrier seeking an ETC must also comply with:

In **Resolution T-17002 (May 25, 2006)**, the CPUC adopted *The Comprehensive Procedures and Guidelines for ETC Designation and Requirements for ETCs* that are consistent with FCC Order 97-157 regarding designation of a telephone carrier as a qualified ETC. Pursuant to this Resolution, applicants seeking ETC designation in California are required to provide the following: a description of the proposed service offerings and attached service area maps; description of the advertising plan(s); commitment to provide service; submission of the 2-year service quality improvement plan; ability to remain functional; commitment to consumer protection; demonstration that a carrier's usage plan is comparable to that of the incumbent LEC in the proposed service area; and, public interest determination.

Notice/Protests of the Advice Letter

The advice letter filing was served via email to all parties on the ETC service list and appeared in the Commission's Daily Calendar on December 10, 2013. No protests were filed.

Discussion

Company Overview and Proposed Lifeline Rate Plans

Tempo Telecom, LLC (Tempo), under the brand designation "*Tempo*," is a prepaid wireless service provider of Lifeline-only services with principal offices at 2300 Main Street, Suite 340, Kansas City, MO, 64108. Using the Sprint Spectrum, L.P. network on a wholesale basis, Tempo is able to operate as a mobile virtual network operator. On October 10, 2013, the Commission issued Tempo its Wireless Identification Registration number U-4459-C allowing it to operate as a commercial mobile radio service (CMRS) provider in California.

On December 5, 2013, Tempo filed Tier III Advice Letter (AL) 2 requesting ETC designation to receive federal support to provide only federal Lifeline prepaid wireless service to eligible customers under the brand "*Tempo*." Tempo proposes approval of two rate plans that are only available to eligible Lifeline customers:

- *Lifeline Basic 150 Minutes* of talk and text at no cost within the 150 minutes of use.
- *Lifeline Basic 250 Minutes* of talk and text at no cost within the 250 minutes of use.

These plans include a free wireless handset, voicemail, national texting (three texts equals 1 minute of use), 911 and E911, call waiting, call forwarding, and caller ID. Tempo proposes offering web/Internet usage in these plans with 1 MB equal to two

minutes of use. Customers can purchase an additional 100 minutes for \$9.95 which are good for 30 days from purchase.

Tempo filed AL Supplement 2A on December 18, 2013, clarifying its requested service area to be specifically in the service territories of Citizens Telecommunications Company of California, Citizens Telecommunications Company of the Southwest, Frontier Communications of the Southwest, Inc., Frontier Communications West Coast, Inc., AT&T California (Pacific Bell), Verizon California, and SureWest Telephone.

Compliance with Federal Rules - Federal ETC Requirements

To receive an ETC designation, a carrier must satisfy all FCC ETC requirements including public interest requirements. Tempo asserts that it will bring increased competitive choice and unique advantages to qualifying consumers by a carrier committed to quality. In addition, it will offer a competitive alternative to low-income consumers which “will exert further competitive pressures on existing wireless Lifeline providers operating in California.”⁹ CD staff determined through its price analysis (discussed below) that Tempo’s plans would cost a Lifeline customer more per month than currently available Lifeline wireless 250 plans.

Public Interest Determination Pursuant to T-17002

Before recommending designation of a carrier as an ETC, CD staff must determine that doing so would be in the public interest for California consumers.¹⁰ In the Lifeline Reform Order, the FCC clearly states the importance of promoting universal service principles¹¹ and in that context that the Lifeline program includes a public interest determination particularly for Lifeline-only wireless reseller ETCs where the FCC has forborne from the facilities-based requirement.¹² Since the federal Lifeline program adopted a technology-neutral definition for supported service, Tempo explains its service proposes to give consumers a choice of prepaid wireless rate offerings that are “consistent with the federal Act’s requirement that consumers have access to quality services at ‘just, reasonable, and affordable rates,’ and is consistent with the FCC’s findings that Lifeline consumers should have the option to purchase bundled packages, additional calling features, and optional voice services.”¹³

Price Analysis

When analyzing Lifeline plan pricing, CD staff compares non-Lifeline retail plan prices to the prepaid Lifeline-only plans to determine what plans are reasonable, as well as currently available federal Lifeline retail plans. CD staff evaluated Tempo’s proposed Lifeline plans using the expected monthly cost to a low-income consumer based on 615

⁹ AL 2, p. 15.

¹⁰ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Dkt 96-45 (FCC 05-46), released Mar 17, 2005 ¶ 40 and CPUC Resolution T-17002, *Appendix A, Section II-G: Public Interest Determination*.

¹¹ 47 U.S.C. § 254(b)(c)(e)(2).

¹² *Lifeline Reform Order* at ¶¶ 219, 378, 362, and fn 968.

¹³ AL 2, p. 6.

average minutes of use¹⁴ compared to similar incumbent local exchange carrier (ILEC) Lifeline plans, retail prepaid wireless, and other wireless ETC Lifeline plans.

Tempo's proposed *150 Minute Plan* and *250 Minute Plan* are free to Lifeline-eligible customers up to the minute threshold subscribed. However, beyond the thresholds, Tempo proposes a rather steep per-minute cost for the purchase of additional airtime. Customers who deplete their monthly minutes can recharge 100 minutes for \$9.95, or \$0.10 per minute. CD's analysis using the average minutes of use data shows, for example, that the *150 Minute Plan* would cost a Lifeline customer \$39.85 per month for 615 average minutes of use and likewise the *250 Minute Plan* would cost \$29.90. Most recently approved prepaid federal Lifeline wireless plans for 250 minutes cost a Lifeline customer \$12.05 and \$14.60 per month, which is 60% to 51% less than Tempo's. Those same 250 plans cost less than Tempo's proposed *150 Minute Plan*. Further, other approved prepaid federal Lifeline wireless plans with 500, 1,000, and unlimited voice minutes cost less than Tempo's proposed plans. In fact, such approved monthly plans cost \$8.80 and \$16.50 for 500-minute plans, \$20 for 1,000-minute plans, and \$21.50 and \$30 for unlimited voice plans.

See Attachment 1 for comparison chart details.

Comparable Local Usage and Equal Access

CD staff also compared Tempo's two plans to currently available retail and federal Lifeline offerings made by wireless and wireline local exchange carriers. Prepaid retail wireless plans with substantially more monthly minutes of use cost significantly less than Tempo's two proposed Lifeline plans. For instance, Nexus' *Reach Out Simple Plan* of 1,000 voice minutes costs \$20 per month and Virgin Mobile's *PayLo 1,500 minutes talk and text plan* costs \$30 per month.

See Attachment 2 for comparison chart details.

CD staff does not believe that it is in the public interest to approve Tempo's *150 Minute Plan* and the *250 Minute Plan* which would cost a Lifeline customer more than similar or better Lifeline plans or readily available retail offerings and recommends that the Commission reject Tempo's advice letter.

Safety Concerns

Although Tempo customers would have the ability to make 911 calls when monthly minutes are exhausted, low-income customers could be limited in placing telephone calls for essential services including health and welfare agencies, medical offices, government program offices, and schools. Low-minute plans could have a detrimental

¹⁴ *In the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, WT Dkt. No. 11-186 (FCC 13-34) (*Sixteenth Report on Mobile Competition*). The FCC annually issues a mobile competition report which reflects analysis of 2011 data submitted by carriers. CD staff analysis uses the 615 average minutes of use (MOU) for wireless voice as a base to evaluate Lifeline plan offerings (Table 38).

effect on low-income customers as additional minutes to address essential services beyond the threshold can be costly.

Final Conclusions and Staff Recommendations

CD staff does not believe it is in the public interest to approve Tempo's *150 Minute Plan* and the *250 Minute Plan* because the proposed plans would cost Lifeline customers with 615 average minutes of use more than other ETCs with similar prepaid federal Lifeline wireless plans currently available to California low-income customers as well as off-the-shelf retail wireless plans. We find that it is not in the public interest to approve Tempo's request for ETC designation at this time nor to continue to review this ETC request to evaluate if Tempo has met other ETC criteria. CD recommends this advice letter be denied. Tempo may resubmit a new advice letter for ETC designation with a more consumer-friendly plan(s) taking into account normal usage patterns. Should Tempo file a new advice letter to address the concern noted, the Commission will examine Tempo's new request for ETC designation.

Comments

In compliance with P.U. Code § 311(g), the Commission emailed a notice letter on October 2, 2014, informing all parties on the eligible telecommunications carrier service list of the availability of this resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available at this same website.

Tempo filed the following comments on October 27, 2014:

1. Tempo requests that the Commission reject the draft resolution or, as an alternative, hold the draft resolution to give Tempo an opportunity to amend its existing advice letter or to file a new advice letter and offers these comments:
 - a. Tempo believes its proposed service offerings add value to the marketplace. Tempo states that its proposed 150 and 250 minute offerings are based on its experience offering the same voice minutes to wireless Lifeline customers in other states and notes that the average low-income customer rarely purchases additional minutes. Tempo points out errors related to texts per minute and the calculation of the excess minute charges.

CD response:

CD staff has used a standard method of evaluating proposed Lifeline plans since 2011. This approach estimates what the cost of a proposed Lifeline plan will be to the low income consumer based on a monthly average minute of use obtained from the FCC's annual report on the Commercial Mobile Radio

Service market. This estimated cost is then compared to other similar federal Lifeline plans that have been approved in California, and comparison to readily available, off-the shelf retail plans that are offered to any consumer.

Staff is not aware of any independent data substantiating Tempo's claims as to customer preference for low-minute plans, and the company did not provide any in its comments. Even after correcting its price analysis for the identified errors, CD continues to believe that the 150 and 250 minute plans should not be approved because they still cost more than approved Lifeline plans and readily available retail plans (see corrected *Attachments 1 and 2*). Therefore, CD continues to believe that it is not in the public interest to approve Tempo's plans.

- b. Tempo did not have the opportunity to discuss its proposed service offerings with staff and have the opportunity to amend the plans prior to a DRAFT Resolution being circulated for comment.

CD response:

Tempo did not submit with its advice letter a price analysis of its own plans using Staff's established calculation and comparison methodology, which would have shown the high estimated cost of each plan to Lifeline customers with average minutes of use. Tempo is free to reassess its federal Lifeline plan strategy and submit an Advice Letter requesting ETC designation.

- c. Tempo is considering filing an amended advice letter or a new advice letter.

CD response:

Pursuant to Commission rules, an advice letter cannot be amended once a resolution has been released for public comment.¹⁵ Tempo may submit a new advice letter.

FINDINGS AND CONCLUSIONS

1. Tempo Telecom, LLC is a prepaid wireless service provider that uses the Sprint Spectrum, L.P. network on a wholesale basis under the brand designation "Tempo." Its principal offices are at 2300 Main Street, Suite 340, Kansas City, MO, 64108.
2. On October 10, 2013, the Commission issued Tempo Telecom, LLC its Wireless Identification Registration number U-4459-C allowing it to operate as a commercial mobile radio service (CMRS) provider to the public in California.

¹⁵ General Order 96-B §5.3.

3. On December 5, 2013, Tempo Telecom, LLC filed Tier III Advice Letter (AL) 2 requesting ETC designation to offer only prepaid federal Lifeline wireless service to eligible customers under the brand "*Tempo*." Tempo Telecom, LLC proposed two Lifeline-only plans at no cost to eligible customers: *150 Minute Plan* and the *250 Minute Plan*.
4. On December 18, 2013, Tempo Telecom, LLC filed Advice Letter Supplement 2A requesting ETC designation to clarify the service area.
5. Tempo Telecom, LLC's proposed prepaid federal Lifeline wireless plans cost low-income customers with 615 average minutes of use:
 - *150 Minutes Plan* for \$39.85 per month
 - *250 Minutes Plan* for \$29.90 per month
6. Tempo Telecom, LLC's proposed Lifeline offerings would cost a Lifeline customer with 615 average minutes of use more than other currently available prepaid federal Lifeline wireless and off-the-shelf retail wireless plans.
7. It is not in the public interest to approve Lifeline plans that would cost Lifeline customers with 615 average minutes of use more than recently approved prepaid federal Lifeline wireless plans and/or readily available off-the-shelf retail prepaid wireless plans that are available to all consumers.
8. In addressing safety, although Tempo Telecom, LLC customers would have the ability to make 911 calls when monthly they exhaust their minutes, customers could be limited in placing telephone calls for essential services. Additional minutes to address essential services beyond the threshold can be costly.
9. Tempo Telecom LLC's request for Eligible Telecommunications Carrier designation in California should be denied.
10. On October 2, 2014, the Commission emailed a draft of this resolution to the eligible telecommunications carrier service list for public comments.
11. On October 27, 2014, Tempo Telecom, LLC filed comments as follows:
 - Tempo requests the Commission to reject the draft resolution or, as an alternative, hold the draft resolution to give Tempo an opportunity to amend its existing advice letter or to file a new advice letter and offers in support;
 - Tempo did not have the opportunity to discuss its proposed service offerings with staff; and,
 - Tempo is considering filing an amended advice letter or a new advice letter.

12. Tempo Telecom, LLC may file a new advice letter to request federal eligible telecommunications carrier designation.

THEREFORE, IT IS ORDERED that:

1. The Commission denies Tempo Telecom, LLC's (U-4459-C) Advice Letter 2 requesting Eligible Telecommunications Carrier designation to provide federal Lifeline prepaid wireless service throughout California.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on November 6, 2014, the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

Attachment 1 -- Comparison of Proposed Federal Lifeline Wireless Plans to Other Prepaid Federal Lifeline Wireless Plans in Service Area (Assuming Average Wireless MOU)																							
Tempo Telecom LLC	Tempo Telecom 150	Nexus 250	Budget Mobile 250	TAG Basic Plan 250	Total Call Plan 250	Boomerang 250 Minute Basic Plan +25MB data	Tempo Telecom 250	Virgin Mobile Free Plan	Telescope 300	Budget Mobile 500	Virgin Mobile \$5 Plan	Telescope 1100	Virgin Mobile \$20 Plan	Nexus 1000	Budget Mobile 1000	TAG Mobile Plan 1000	Cricket Unlimited	Total Call Unlimited Talk & Text	Virgin Mobile \$30 Unlimited Plan	TAG Mobile Plan Unlimited	Budget PrePay Unlimited Talk/Text	Total Call Unlimited Talk, Text, & Data	
Avg. MOU*	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	150	250	250	250	250	250	250	250	300	500	500	1100	1000	1000	1000	1000	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	
Texts included	3 txt = 1 min	-	50	250	1 txt = 1 min	-	3 txt = 1 min	250	1 txt = 1 min	100	500	1 txt = 1 min	1000	1000	250	1000	-	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	
Data included	1MB = 2 MOU	-	-	-	-	25 MB	1MB = 2 MOU	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Avg. Excess MOUs	465	365	365	365	365	365	365	365	315	115	115	-	-	-	-	-	-	-	-	-	-	-	
Cost per Min in excess of allowance**	\$0.07/\$0.10	\$0.033	\$0.033	\$0.033	\$0.033	\$0.040	\$0.07	\$0.100	\$0.030	\$0.033	\$0.100	-	-	-	-	-	-	-	-	-	-	-	
Cost of excess minutes	\$39.85	\$12.05	\$12.05	\$12.05	\$12.05	14.60	\$29.90	\$36.50	\$9.45	\$3.80	\$11.50	-	-	-	-	-	-	-	-	-	-	-	
Min. Lifeline Plan Cost (per D-10-11-033) or Cost per Plan	\$0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0	\$0.00	\$2.50	\$5.00	\$5.00	\$20.00	\$20.00	\$20.00	\$20.00	\$20.00	\$21.50	\$29.99	\$30.00	\$30.00	\$32.00	\$39.99	
Total GO IS Cost to Customers	\$39.85	\$12.05	\$12.05	\$12.05	\$12.05	\$14.60	\$29.90	\$36.50	\$11.95	\$8.80	\$16.50	\$20.00	\$20.00	\$20.00	\$20.00	\$20.00	\$21.50	\$29.99	\$30.00	\$30.00	\$32.00	\$39.99	
Caller ID	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Long Distance	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Voicemail	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Federal Excise Tax	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Total Additional costs of vertical features	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Total Cost to Lifeline Customers with 615 MOU and additional costs of vertical features	\$39.85	\$12.05	\$12.05	\$12.05	\$12.05	\$14.60	\$29.90	\$36.50	\$11.95	\$8.80	\$16.50	\$20.00	\$20.00	\$20.00	\$20.00	\$20.00	\$21.50	\$29.99	\$30.00	\$30.00	\$32.00	\$39.99	

* Average Minutes of Use based on FCC 13-34 16th Mobile Wireless Competition Report issued March 19, 2013, Table 38. Avg MOU 615, Year 2011.

** Requires purchase of airtime card for additional minutes: 60 minutes for \$5.95 (\$0.10/min), 100 mins for \$9.95 (\$0.10/min), and 200 minutes for \$14.95 (\$0.07/min).

Attachment 2 -- Comparison of Proposed Federal Lifeline Wireless Plans to Prepaid Retail Wireless Plans (Assuming Average Wireless MOU)									
		Prepaid Retail Wireless Plans							
Tempo Telecom LLC	Tempo Telecom 150	Tempo Telecom 250	Virgin Mobile PayLo 1500	Nexus Reach Out Simple Plan 1000	Metro PCS Unlimited	AT&T Go Phone Unlimited Talk & Text	Sprint Basic Plus	Verizon Talk & Text 450	
Avg. MOU*	615	615	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	150	250	1500	1000	Unlimited	Unlimited	Unlimited	450	450
Texts included	3 txt = 1 min	3 txt = 1 min	1500	-	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data included	1MB = 2 MOU	1MB = 2 MOU	30 MB	-	Unlimited	Unlimited	Unlimited	-	-
Avg. Excess MOUs**	465	365	-	-	-	-	-	165	165
Cost per Min in excess of allowance	\$0.07/\$0.10	\$0.07	\$0	\$0	\$0	\$0	\$0	\$0.45	\$0.45
Cost of excess minutes	\$39.85	\$29.90	\$0	\$0	\$0	\$0	\$0	\$74.25	\$74.25
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$0	\$0	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$59.99	\$59.99
Total GO 153 Cost to Customers	\$39.85	\$29.90	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$134.24	\$134.24
Caller ID	\$0.00	\$0.00	-	-	-	-	-	-	-
Long Distance	\$0.00	\$0.00	-	-	-	-	-	-	-
VoiceMail	\$0.00	\$0.00	-	-	-	-	-	-	-
Federal Excise Tax	\$0.00	\$0.00	-	-	-	-	-	-	-
Total Additional costs of vertical features	\$0.00	\$0.00	-	-	-	-	-	-	-
Total Cost to Lifeline Customers with 615 MOU and additional costs of vertical features	\$39.85	\$29.90	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$134.24	\$134.24

* Average Minutes of Use based on FCC 13-34 16th Mobile Wireless Competition Report issued March 19, 2013, Table 38. Avg MOU 615, Year 2011.
 ** Requires purchase of airtime card for additional minutes: 60 minutes for \$5.95 (\$0.10/min), 100 mins for \$9.95 (\$0.10/min), and 200 minutes for \$14.95 (\$0.07/min).