

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight & Programs Branch**

**RESOLUTION T- 17455
DECEMBER 4, 2014**

R E S O L U T I O N

Resolution T-17455. This Resolution conditionally grants the request of AmeriMex Communications Corporation doing business as “*SafetyNet Wireless*” to be designated 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) conditionally grants the request of AmeriMex Communications Corporation (AmeriMex) (U-4458-C), a wireless carrier doing business as “*SafetyNet Wireless*,” 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 AmeriMex seeks federal Lifeline support only and does not seek California LifeLine fund support.

Background

Congress directed the Federal Communications Commission (FCC) to establish universal service support (USF) 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 AmeriMex Communications Corporation’s Advice Letter 2 (filed September 11, 2013), Advice Letter 2A (April 9, 2014), Advice Letter 2B (July 31, 2014), and Advice Letter 2C (August 29, 2014).

⁴ 47 U.S.C. § 254(b)(1).
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Federal ETC Designation Requirements

In order to receive federal universal service support, an applicant must be designated as an ETC. 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) of the Act, state commissions are given the primary responsibility for designating ETCs in their states. This section states that, “[u]pon request and consistent with the public interest, convenience, and necessity, the state 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 eligible telecommunications carrier for a service area designated by the state commission” so long as the requesting carrier meets the requirements of Section 214(e)(1). Section 214(e)(1) provides that, a common carrier designated as an ETC must offer services supported by the federal Universal Service Fund (USF) throughout the designated service area either by using its own facilities, resale, or by a combination of its own facilities and resale of another carrier’s services and must advertise the services and the related charges using advertising media of general distribution throughout the designated service area. Advertising must include the availability of Lifeline services in a manner reasonably designed to reach those likely to qualify for those services.

In addition, the FCC’s rules require that a carrier requesting ETC designation must:

1. Certify that it will comply with the service requirements applicable to the support that it receives;
2. Submit a five-year plan that describes proposed improvements or upgrades to the applicant’s network throughout its proposed service area;
3. Demonstrate its ability to remain functional in emergency situations;
4. Demonstrate that it will satisfy applicable consumer and service quality standards;
5. Demonstrate that it is financially and technically capable of providing the Lifeline service; and
6. Submit information describing the terms and conditions of any voice telephone service plans offered to Lifeline customers.⁶

Before granting an ETC status to a carrier, state commissions must determine that it is in the public interest to do so.

⁵ 47 C.F.R. §§ 54.400 *et seq.* contains the FCC’s Lifeline rules issued to implement § 254 of the Act. 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 47 C.F.R. § 54.202(a).

The federal Lifeline program reimburses ETCs for providing discounts to eligible low-income customers of \$9.25 per month and provides additional reimbursements for serving customers living on Tribal lands.⁷

California Public Utilities Commission ETC Designation Requirements

A carrier seeking an ETC designation must also comply with the CPUC's ETC rules. 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:

1. A description of the proposed service offerings and attached service area maps; description of the advertising plan(s);
2. A statement of commitment to provide service;
3. Submission of the 2-year service quality improvement plan;
4. A showing of the ability to remain functional;
5. A statement of commitment to consumer protection;
6. Demonstration that a carrier's usage plan is comparable to that of the incumbent LEC in the proposed service area; and
7. A public interest determination.

In addition, ETC designation requests must comply with General Order (GO) 153 which implements the *Moore Universal Telephone Service Act*. GO 153 contains California Lifeline program requirements. ETCs are required to comply with GO 153 requirements, including the California Third-Party Administrator's (TPA) determination of customer eligibility for certifications and renewals. Carriers must also comply with CPUC User Fee and surcharge obligations. The CPUC User Fee is levied on all telecommunications carriers providing services directly to customers and the amount of fees is a percentage calculation based on all intrastate customer billings for telecommunications services. All telecommunications carriers that provide basic telephone service are also required to collect and remit Public Purpose Program (PPP) surcharges from end-users that fund the CPUC's universal service program.

Notice/Protests

AmeriMex served its advice letter filing via email on all parties on the ETC service list and the AL appeared in the Commission's Daily Calendar on September 13, 2013. No protests were received.

⁷ 47 C.F.R. § 54.403.

Discussion

Company Overview and Proposed Lifeline Rate Plans

AmeriMex Communications Corporation (AmeriMex), doing business as “*SafetyNet Wireless*,” is a prepaid wireless service provider with principal offices at 1007 Mansell Road, Suite A, Roswell, GA 30076. A privately held Georgia corporation, AmeriMex began offering telecommunications services in 1998, according to its federal compliance plan, and expanded from a long distance calling card distributor to a competitive local exchange carrier (CLEC) providing residential wireline service to more than 20,000 customers. In December 2011, AmeriMex began offering wireless ETC service in other parts of the nation and provides wireless services to approximately 70,000 customers by reselling the services of Ready Mobile, LLC, a reseller of Sprint and Verizon Wireless services.

On July 30, 2013, the Commission issued AmeriMex its Wireless Identification Registration number U-4458-C allowing it to operate as a commercial mobile radio service (CMRS) provider in California.

On September 11, 2013, AmeriMex 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. Using network services from Sprint excluding the Small LEC areas, AmeriMex proposed these three Lifeline-only plans and each of these have a \$25 activation fee:

- *68 Minutes & Free Phone Plan* for no cost with unused minutes rolled over and available for up to 12 months;
- *125 Minutes & Free Phone Plan* for no cost with unused minutes rolled over and available up to 3 months; and
- *250 Minutes & Free Phone Plan* for no cost. Unused minutes expire each month.

Additional voice minutes can be purchased in increments of \$5, \$10, \$20, \$30, and \$50 denominations with prices ranging from \$0.10 to \$0.03 per minute.

On March 27, 2014, AmeriMex filed AL Supplement 2A and withdrew it on June 19, 2014.

On July 31, 2014, AmeriMex filed AL Supplement 2B stating its service commitment, compliance with consumer protections, and an explanation of its financial and technical capability. In addition, AmeriMex requested approval for two additional Lifeline-only plans, each of these has a \$39 activation or service conversion fee:

- *501 Minutes & Free Phone Plan* for \$5.75 per month. Additional minutes cost \$0.10 each; and
- *1,000 Minutes & Free Phone Plan* for \$12.65 per month. Additional minutes cost \$0.10 each.

Additional voice minutes can be purchased in increments of 50 minutes for \$5 (\$0.10 per minute), 200 minutes for \$10 (\$0.05 per min), 500 minutes for \$20 (\$0.04 per min), 800 minutes for \$30 (\$0.038 per min), and 1,500 minutes for \$50 (\$0.38 per min).

On August 29, 2014, AmeriMex filed AL Supplement 2C to clarify specific details of its advice letter and to address its commitments to program requirements. Primarily, it confirmed that it will resell services of underlying carriers, Verizon and Sprint, through its direct service agreement with Ready Wireless, LLC to deliver wireless services in California.

On October 10, 2014, AmeriMex filed AL Supplement 2D to add supporting discussion about its reseller agreements with underlying carriers, Sprint, Verizon, and T-Mobile; to submit a Shapefile of the proposed T-Mobile service area; and, to emphasize its process working with its underlying carriers to provide service in a reasonable time to potential customers within the approved service area but who may be outside the network.

Compliance with Federal Rules

Federal ETC Requirements:

A carrier must satisfy all FCC ETC requirements in order to receive an ETC designation. AmeriMex has met the following federal ETC requirements:

Demonstration that the services intended to be offered comply with the voice telephony definition - Pursuant to 47 U.S.C. § 214(e)(1) and (6), AmeriMex submits that it is a common carrier and is able to provide telephone exchange and exchange access through its arrangements with its underlying facilities-based providers, Verizon, Sprint, and T-Mobile.

Advertise using media of general distribution - AmeriMex demonstrates that its Lifeline services meet the definition of voice telephony and commits to advertise in a manner reasonably designed to reach those likely to qualify for Lifeline using any California-specific advertising requirements such as media of general distribution which may include advertising via newspaper, mail circular, web media, and radio, among other media, and target residential customers with its advertising efforts.

Commitment to provide supported service throughout the designated service area - AmeriMex commits to provide service to all requesting customers in the areas that it is designated an ETC. CD has concerns about how AmeriMex, a reseller that obtains services from an underlying facilities-based carrier and another reseller, could commit to provide service to a Lifeline customer within the service area but outside of its existing network coverage as required by FCC rules.⁸

⁸ FCC 05-46, ¶ 22, released March 17, 2005, and as adopted in CPUC Resolution T-17002, Appendix A §2, effective May 25, 2006.

To address staff's concern, AmeriMex provided its agreements⁹ with Ready Wireless, LLC and Sprint to demonstrate that in the event that they receive a request for service from a prospective customer living in AmeriMex's service area but outside of the existing network coverage, AmeriMex has the ability to request expansion of network coverage through the underlying facilities-based carriers.

However, AmeriMex's agreement with Ready Wireless, LLC does not address how requests for expansion of wireless signal coverage will be handled to accommodate Lifeline customers living in the service area of the underlying facilities-based carrier but do not get wireless signal coverage. The Sprint agreement specifically states that Sprint will not be required to make any changes to equipment, devices, or facilities to accommodate AmeriMex. AmeriMex did not provide the agreement for T-Mobile services.

To ensure that AmeriMex complies with its obligation to provide service to prospective Lifeline customers within the network service area pursuant to FCC rules, CD staff recommends that the Commission require AmeriMex to submit an Information Only¹⁰ report quarterly to the Communications Division Director. The report would include: a description of each customer service request; the dates of the request; the disposition of the request; method(s) used to provide service (e.g., modifying or replacing customer equipment, deploying a roof-mounted antenna or other equipment, adjusting the nearest cell tower or network or customer facilities, reselling services from another carrier's facilities, or employing, leasing or constructing an additional cell site); and, the date of completion.

Demonstration of ability to remain functional – AmeriMex's agreements with its resellers allow the company to provide to its customers the same ability to remain functional in emergency situations as currently provided by the underlying carriers 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. Sprint, Verizon, and T-Mobile have redundancies, back-up generator power, and extensive disaster recovery programs.

Reseller's submission of FCC-approved compliance plan – AmeriMex submitted a revised compliance plan approved by the FCC on December 26, 2012.

Demonstration of financial and technical capability – AmeriMex is financially and technically capable of providing Lifeline services. AmeriMex has been in business since 1998 and provides service to both Lifeline and non-Lifeline customers. The company already successfully provides retail long distance (both domestic and international) and Lifeline wireless services in Georgia. AmeriMex has not been subject to enforcement action or ETC revocation proceedings in any state. Doing

⁹ Advice Letter Supplements 2C and 2D.

¹⁰ General Order 96-B General Rules §§ 3.9 and 6.

business as “*SafetyNet Wireless*,” AmeriMex is financially able to provide Lifeline-supported services; it does not intend to offer exclusively Lifeline-supported services and is, therefore, not exclusively dependent on universal service funds for its revenue. The wireless ETC service represents less than 30 percent of AmeriMex’s total revenues. Senior management of the company has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise. Also, as a reseller of wireless service, AmeriMex will rely upon the managerial and technical expertise of its underlying carriers, Sprint, Verizon, and T-Mobile.

Commitment to meet public interest requirements for the proposed service areas – AmeriMex asserts that it meets the FCC public interest criteria because as an ETC, it will help to ensure that eligible customers will enjoy wireless benefits at a low cost, will advance customer service with increased competition, and likely should expand program participation of qualifying customers.

Commitment to satisfy all applicable consumer protection and service quality standards – AmeriMex agrees to abide by all applicable state and federal consumer protection and service quality standard requirements and commits to comply with the Cellular Telecommunications and Internet Association’s (CTIA) *Consumer Code for Wireless Service*.

Agreement to apply the Lifeline support discount to residential retail plans – AmeriMex states that it will apply the \$9.25 federal Lifeline support amount to all of its proposed plans.

CD staff observes that AmeriMex did not demonstrate compliance with the following three federal ETC requirements and makes these recommendations:

- 1) AmeriMex did not specifically address its commitment to file annually federal compliance reports, including but not limited to the Form 481 and 47 C.F.R § 54.422. CD staff recommends that the Commission direct AmeriMex to file federal compliance reports with the FCC and USAC and provide copies of these reports to this Commission, as directed.
- 2) AmeriMex did not confirm that, when approved for ETC designation, it will submit specific information to USAC. Federal law, specifically 47 C.F.R. § 54.401(d), requires that when a state commission designates a carrier an ETC status, the state commission shall file or require the ETC to file information with USAC that demonstrates that the ETC’s Lifeline plan meets the universal service support criteria for low-income consumers, including the terms and conditions of

voice telephony service plans and the plan details.¹¹ To comply with § 54.401(d), CD recommends that the Commission direct AmeriMex to file the applicable information directly with USAC. Once USAC approves the service plans, AmeriMex shall provide to the Communications Division Director a copy of the information submitted to USAC and a copy of AmeriMex's certification of approval from the USAC within 30 days of receipt from USAC.

With implementation of the three recommendations covered above, CD staff believes AmeriMex would be compliant with FCC ETC requirements.

Compliance with CPUC Rules

GO 153 Basic Service Elements Compliance:

GO 153 requires carriers that seek an ETC designation to comply with 22 basic service elements of California LifeLine. (See *Attachment B* of this resolution for a complete list of California LifeLine basic service requirements.)¹² AmeriMex requested a waiver of the following California LifeLine basic service elements: (4) the ability to receive free incoming calls, (10) customer choice of local flat-rate or measured-rate service, (11) free provision of one directory listing per year, (12) availability of free white pages telephone directory, (15) free access to 800 and 800-like toll-free numbers, and (21) access to *two residential lines* if a low income household with a disabled person requires both lines to access Lifeline.¹³

CD staff recommends granting waivers from elements (4), (10), (11), (12), and (15) because they do not apply to wireless service providers but to providers of wireline services; the Commission has granted such waivers in the past. However, CD staff recommends denying AmeriMex's request for a waiver of element (21) because other federal Lifeline wireless providers comply with this service element currently, and because D.14-01-032 maintains this element as a requirement in the California LifeLine rules for wireless carriers.¹⁴ Therefore, AmeriMex is required to provide access to two residential lines if a low-income household with a disabled person requires both lines to access Lifeline.

LifeLine Third Party Administrator:

GO 153, § 4.2 related to California LifeLine enrollment procedures provides a reasonable means for wireless carriers to determine if a prospective low-income customer is eligible for federal Lifeline wireless service. In California, the California LifeLine Administrator

¹¹ USAC requires a copy of a new ETC's designation order issued by its state utility regulator, <http://usac.org/li/telecom-carriers/step03/default.aspx>. Site last visited October 20, 2014.

¹² Current GO 153 continues to be used to evaluate ETC designation request by wireless carriers including federal Lifeline applications and renewals until the Commission revises GO 153 and determines the extent to which revised GO 153 rules and revised California LifeLine service elements should apply to federal Lifeline wireless offerings in Rulemaking 11-03-013.

¹³ D.10-11-033 (November 19, 2010).

¹⁴ D.14-01-032 (January 16, 2014), *Attachment D, Appendix A-2*, service element 17 (revised).

(CLA) performs enrollment application and renewal functions.¹⁵ AmeriMex agrees to comply with GO 153 requirements, including consumer enrollment, prequalification, certification, eligibility verification and annual renewal, and working with the CLA. Once eligibility is established and approval information is sent by the CLA, AmeriMex will ship wireless handsets to qualifying customers and service will be activated.

CD staff, however, recommends that the Commission require AmeriMex to label clearly its wireless offerings as “*federal Lifeline service*”. Doing so would minimize customer confusion between the California LifeLine and federal Lifeline programs and would disseminate adequate information about potential coverage and service quality issues. AmeriMex should also provide copies of all marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures to CPUC California LifeLine staff for review and approval prior to publication and distribution.

Resolution T-17002 Compliance:

AmeriMex has satisfied the applicable requirements set forth in Resolution T-17002 including, but not limited to: providing Lifeline-only services within the proposed service area; providing the designated services; and, complying with advertising rules as required by the FCC, such as using printed advertisements, which will state clearly that the Lifeline support is from the federal Lifeline program only.

AmeriMex is current with payment of the annual PUC User Fees and universal service public purpose program surcharges. As a condition of its Commission authority and its ETC designation, AmeriMex must continue to remain current with its payments. The Commission may revoke AmeriMex’s ETC designation and/or operating authority if the company does not remit timely fees and surcharges and the Commission will notify the USAC and the FCC of the revocation.

AmeriMex states it has the ability to remain functional in emergency situations by working with its underlying carriers, Verizon, Sprint, and T-Mobile. AmeriMex commits to satisfy all applicable state and federal requirements related to consumer protection and service quality standards.

Providing Federal Lifeline Wireless Service to Customers in Small LEC Service Areas:

AmeriMex does not seek ETC designation in the service areas of the Small LECs. Consistent with the policy adopted in Resolution T-17284, AmeriMex will coordinate with the Small LECs using their list of the ZIP+4 codes¹⁶ associated with the Small LECs service areas. AmeriMex will use that data to ensure that no federal Lifeline wireless service is offered to customers residing in the Small LECs’ service areas.

¹⁵ GO 153, § 4.2.1. The current California LifeLine Administrator is Xerox.

¹⁶ ZIP+4 code is the standard ZIP code with a four digit add-on code. This add-on code identifies a smaller geographic region within the main code, such as a city block, office building, etc. In Resolution T-17284, Virgin Mobile was required to screen prospective Lifeline customers to ensure they do not reside in the Small LECs’ territories. The screening can be accomplished by using the list of ZIP+4 codes for the Small LEC service areas.

CD staff recommends that the Commission require the Small LECs to provide to AmeriMex, as they do for all current ETCs, an updated ZIP+4 code data list of the Small LECs' service areas¹⁷ within 30 days of the effective date of this Resolution, as appropriate for the carrier and the service area. The Small LECs should also be required to provide to AmeriMex any update to the ZIP+4 code data, as needed. AmeriMex should file a copy of any updated ZIP+4 code data list with the Communications Division Director and the CLA. The ZIP+4 code data shall be provided in an MS Excel file (.xls) format via email to the CD Director. The Small LECs also shall provide the CLA the ZIP+4 code data in a format specified by the CLA.

Public Interest Determination:

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.¹⁸ In the Lifeline Order, the FCC clearly states the importance of promoting universal service principles¹⁹ and in that context that the Lifeline program includes a public interest determination particularly for Lifeline-only ETCs where forbearance of the facilities-based requirement exists.²⁰ Since the federal Lifeline program adopted a technology-neutral definition for supported service, AmeriMex proposes to provide increased competition in the approved service area which is in the public interest. In addition, as a reseller with expanded area, AmeriMex often will serve a larger local calling area than a traditional wireless provider and will afford the customer the convenience of telephony mobility. Lifeline-eligible customers will have another provider choice which likely may expand participation of qualifying customers in the Lifeline program.

Upon review, CD staff finds that AmeriMex meets the federal ETC criteria for public interest determination including providing the benefits of increased competitive choice, convenience, security with mobility, ability to purchase additional usage, and the ability to use supported service to send and receive text messages in a prepaid plan.

Price Analysis

When analyzing Lifeline plan pricing, CD staff considers non-Lifeline retail plan prices, relying on competitive forces to determine what plans are reasonable, as well as currently available federal Lifeline retail plans. In addition, CD staff evaluated AmeriMex's proposed offerings using the expected monthly cost to a low-income consumer based on average minutes of use²¹ compared to similar incumbent local exchange carrier (ILEC) Lifeline plans and other wireless ETC Lifeline plans.

¹⁷ On July 5, 2011, the Small LECs filed with the CPUC the ZIP+4 code data pursuant to Resolution T-17284. On July 6, 2011, Frontier Communications West Coast, Inc. filed the ZIP+4 code data for its service areas pursuant to T-17284.

¹⁸ *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*.

¹⁹ 47 U.S.C. § 254(b)(c)(e)(2).

²⁰ *Lifeline Reform Order* at ¶¶ 219, 378, 362, and fn 968.

²¹ *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

The *68 Minutes Plan*, *125 Minutes Plan*, and *250 Minutes Plan* cost \$0 per month after applying the \$9.25 federal support amount. But, these plans would cost a Lifeline customer \$25 to purchase additional minutes under the *68 Minutes Plan* and \$20 for both the *125 Minutes* and *250 Minutes Plans*, based on minutes of average use per month. When compared to similar Lifeline wireless plans available on the market, the additional costs are 27% more out-of-pocket for the *250 Minutes Plan* and 40% more for the *68* and *125 Minute Plans*. See Chart 1 below.

AmeriMex's *501 Minutes Plan* and *1,000 Minutes Plan* have equal or better value for low-income customers when compared to similar prepaid wireless Lifeline packages. In the average minutes of use analysis, the *501 Minutes Plan* costs a total of \$15.75 out-of-pocket, which is less than AmeriMex's proposed low-minute plans costing more when a customer purchases additional minutes. The *1,000 Minutes Plan*, for the retail cost of \$12.65, provides minutes over the average minutes of use per month and includes 200 MB data. See Chart 1 below.

Chart 1 -- Comparison of Proposed Federal Lifeline Wireless Plans to Other Prepaid Federal Lifeline Wireless Plans in Service Area (Assuming Average Wireless MOU)

	Prepaid Wireless Lifeline Plans									
	AmeriMex 68 Minutes	AmeriMex 125 Minutes	Telscape 300	Nexus 250	Budget Mobile 250	TAG Basic Plan 250	Total Call 250 Plan	Boomerang 250 Minute Basic Plan +25MB data	AmeriMex 250 Minutes	Virgin Mobile 250
Avg. MOU*	615	615	615	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	68	125	300	250	250	250	250	250	250	250
Texts included	3 txt = 1 min	1 txt = 1 min	1 txt = 1 min	-	50	250	1 txt = 1 min	-	1 txt = 1 min	250
Data included	-	-	-	-	-	-	-	25 MB	-	-
Avg. Excess MOUs	547	490	315	365	365	365	365	365	365	365
Cost per Min in excess of allowance **	\$0.04; \$0.10	\$0.04	\$0.030	\$0.033	\$0.033	\$0.033	\$0.033	\$0.040	\$0.05	\$0.100
Cost of excess minutes	\$25.00	\$20.00	\$9.45	\$12.05	\$12.05	\$12.05	\$12.05	14.60	\$20.00	\$36.50
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$0	\$0	\$2.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0	\$0.00
Total GO 153 Cost to Customers	\$25.00	\$20.00	\$11.95	\$12.05	\$12.05	\$12.05	\$12.05	\$14.60	\$20.00	\$36.50
Caller ID	-	-	\$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
Voicemail	-	-	\$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
Total Additional costs of vertical features	-	-	\$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	\$25.00	\$20.00	\$11.95	\$12.05	\$12.05	\$12.05	\$12.05	\$14.60	\$20.00	\$36.50

* 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: 50 mins for \$5 (\$0.10/min), 200 mins for \$10 (\$0.05/min), 500 mins for \$20 (\$0.04/min).

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).

	Prepaid Wireless Lifeline Plans								
AmeriMex Communications Corporation dba SafetyNet Wireless	Budget Mobile 500	Virgin Mobile 500	AmeriMex 501 Minutes	Telscape 1100	AmeriMex 1,000 Minutes	Virgin Mobile 1000	Nexus 1000	Budget Mobile 1000	TAG Mobile Plan 1000
Avg. MOU*	615	615	615	615	615	615	615	615	615
Basic Plan Minutes (allowance)	500	500	501	1100	1000	1000	1000	1000	1000
Texts included	100	500	3 txt = 1 min	1 txt = 1 min	1 txt = 1 min	1000	-	250	1000
Data included	-	-	-	-	200 MB	-	-	-	-
Avg. Excess MOUs	115	115	114	-	-	-	-	-	-
Cost per Min in excess of allowance **	\$0.033	\$0.100	\$0.05	-	\$0	-	-	-	-
Cost of excess minutes	\$3.80	\$11.50	\$10.00	-	\$0	-	-	-	-
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$5.00	\$5.00	\$5.75	\$20.00	\$12.65	\$20.00	\$20.00	\$20.00	\$20.00
Total GO 153 Cost to Customers	\$8.80	\$16.50	\$15.75	\$20.00	\$12.65	\$20.00	\$20.00	\$20.00	\$20.00
Caller ID	\$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
Voicemail	\$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
Total Additional costs of vertical features	\$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	\$8.80	\$16.50	\$15.75	\$20.00	\$12.65	\$20.00	\$20.00	\$20.00	\$20.00

* 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: 50 mins for \$5 (\$0.10/min), 200 mins for \$10 (\$0.05/min), 500 mins for \$20 (\$0.04/min).

Comparable Local Usage and Equal Access

To demonstrate that its proposed federal Lifeline wireless plans are reasonable, AmeriMex provided in its AL Supplement 2B a summary comparing its federal Lifeline wireless plans to other retail and federal Lifeline offerings made by wireless and wireline local exchange carriers.

Chart 2 -- Comparison of Proposed Federal Lifeline Wireless Plans to California ILEC Federal Lifeline Wireless Measured Rate Plans and Prepaid Wireless Plans (Assuming Average Wireless MOU)

	AmeriMex Communications Corporation dba SafetyNet Wireless					ILEC MR Lifeline Plans					Prepaid Wireless Retail Plans				
	AmeriMex 68 Minutes	AmeriMex 125 Minutes	AmeriMex 250 Minutes	AmeriMex 501 Minutes	AmeriMex 1,000 Minutes	AT&T Lifeline MR (minimum)	AT&T Lifeline MR (maximum)	Verizon Lifeline MR (minimum)	Verizon Lifeline MR (maximum)	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	615	615	615	615	615	615
Basic Plan Minutes (allowance)	68	125	250	501	1000	146	146	146	146	1500	1000	Unlimited	Unlimited	Unlimited	450
Texts included	3 txt = 1 min	1 txt = 1 min	1 txt = 1 min	3 txt = 1 min	1 txt = 1 min	-	-	-	-	1500	-	Unlimited	Unlimited	Unlimited	Unlimited
Data included	-	-	-	-	200 MB	-	-	-	-	30 MB	-	Unlimited	Unlimited	Unlimited	-
Avg. Excess MOUs**	547	490	365	114	-	469	469	469	469	-	-	-	-	-	165
Cost per Min in excess of allowance	\$0.04; \$0.10	\$0.04	\$0.05	\$0.05	\$0	\$0.033	\$0.033	\$0.033	\$0.033	\$0	\$0	\$0	\$0	\$0	\$0.45
Cost of excess minutes	\$25.00	\$20.00	\$20.00	\$10.00	\$0	\$15.48	\$15.48	\$15.48	\$15.48	\$0	\$0	\$0	\$0	\$0	\$74.25
Min. Lifeline Plan Cost (per D.10-11-033) or Cost per Plan	\$0	\$0	\$0	\$5.75	\$12.65	\$2.50	\$3.66	\$2.50	\$3.66	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$59.99
Total GO 153 Cost to Customers	\$25.00	\$20.00	\$20.00	\$15.75	\$12.65	\$17.98	\$19.14	\$17.98	\$19.14	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$134.24
Caller ID	-	-	-	-	-	\$9.99	\$9.99	\$7.95	\$7.95	-	-	-	-	-	-
Long Distance	-	-	-	-	-	\$6.99*	\$6.99*	\$15.99	\$15.99	-	-	-	-	-	-
Voicemail	-	-	-	-	-	N/A	N/A	\$7.45	\$7.45	-	-	-	-	-	-
Federal Excise Tax	-	-	-	-	-	\$0.08	\$0.11	\$0.08	\$0.11	-	-	-	-	-	-
Total Additional costs of vertical features	-	-	-	-	-	\$17.06	\$17.09	\$31.47	\$31.50	-	-	-	-	-	-
Total Cost to Lifeline Customers with 615 MOU and additional costs of	\$25.00	\$20.00	\$20.00	\$15.75	\$12.65	\$35.04	\$36.23	\$49.45	\$50.64	\$30.00	\$20.00	\$40.00	\$45.00	\$50.00	\$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: 50 mins for \$5 (\$0.10/min), 200 mins for \$10 (\$0.05/min), 500 mins for \$20 (\$0.04/min).

CD staff does not find it in the public interest to approve the 68 Minutes Plan, 125 Minutes Plan, and 250 Minutes Plan although they have a base-monthly cost of \$0 per month for a low-income customer. Additional usage would cost either \$20 or \$25 out-of-

pocket to recharge minutes. Using the average minutes of use analysis, a Lifeline-eligible consumer could pay less using other carriers and in some cases receive data, too. CD staff recommends that the Commission reject AmeriMex's *68 Minutes Plan*, *125 Minutes Plan*, and *250 Minutes Plans*. While the *550 Minutes Plan* costs an eligible customer \$5.75 per month and the *1,000 Minutes Plan* costs \$12.65 per month, CD staff finds these plans to be acceptable choices to low-income customers because they have equal or better value price-wise with more minutes per bucket for low-income customers.

Due Diligence Review:

An integral part of CD's processing of an ETC designation request is a due diligence review of the requesting carrier as a supplement to the public interest analysis to determine if the carrier has engaged in behavior that may call into question its fitness to be granted ETC designation to serve California consumers. The due diligence review includes, but is not limited to, CD's conducting independent research about a carrier's past operations to provide the Commission with information that may be pertinent in deciding whether or not to grant the ETC designation request. Typical research methods include performing Lexis/Nexis legal resource searches, Google Internet searches, reviewing industry and trade publications, querying other governmental agencies (e.g. California Secretary of State for business registration), contacting the FCC and USAC, reviewing a company's history of operations, and contacting the Commission's Safety and Enforcement Division and Consumer Affairs Branch.

CD staff did not uncover any fitness issues to deny approval of AmeriMex's ETC request. We, therefore, find AmeriMex's ETC request consistent with the public interest but if substantive issues emerge after this ETC is approved which raises public interest questions about AmeriMex's operations, the Commission may pursue an enforcement action against the company which may include fines, penalties, and the revocation of ETC designation and/or wireless identification registration authority.

Safety Concerns:

Although wireless phone service offers great mobility for consumers, CD staff notes safety concerns related to wireless mobile phone service and E-911 and/or 911 connection limitations. Where there is a lack of coverage, poor signal strength, or atmospheric or terrain conditions that affect connections, emergency calls may not be completed. In rural areas, for example, with spotty connectivity or interference (e.g. due to geographic or structural obstacles), wireless mobile resellers of wholesale facilities service cannot guarantee full, accessible emergency connections for their own direct customers. An incomplete emergency call can have devastating results. Given that E-911 and/or 911 safety is a common concern for all of California's wireless customers, CD staff recommends that AmeriMex be required to fully and clearly inform prospective federal Lifeline wireless customers that coverage limitations may affect wireless mobile phone service access to E-911 and/or 911 in the event of an emergency. Such disclosures include, but are not limited to, clear statements on marketing materials and conspicuous

placement on the public website in the form of information content on webpages, footnotes, and/or listings on a frequently asked questions (FAQ) webpage.

Future Changes to Federal Lifeline Wireless Plans:

Regarding future changes that AmeriMex may want to make to the federal Lifeline wireless plan offerings, including service area changes, CD staff recommends as follows:

1. For changes to AmeriMex's Lifeline-only plans that are not based on retail plans currently available to all prospective customers at the time of filing, the company must file a Tier II Advice Letter to request approval of any changes.²² Such request shall demonstrate that the change complies with Resolution T-17002, i.e. *Appendix A-Sections II-E: Local Usage* and *II-G. Public Interest Determination*, all applicable GO 153 rules, and pricing rules pursuant to D.10-11-033 or as modified and/or updated by subsequent Decisions and/or Resolutions effective at the time of the request; and
2. For changes to its approved service area, the company must file a Tier II Advice Letter to request approval and include a map(s) in Shapefile format of the proposed area.

Final Conclusions and Staff Recommendations:

CD staff recommends conditional approval of AmeriMex's request for an ETC designation for the purpose of offering federal Lifeline wireless service in California in the service areas of the URF carriers, excluding the Small LEC service areas. CD staff specifically recommends conditional approval for AmeriMex to offer these two plans:

- *501 Minutes & Free Phone Plan* for \$5.75 per month with additional minutes costing \$0.05 per minute; and
- *1,000 Minutes & Free Phone Plan* for \$12.65 per month.

Each plan requires a \$39 activation fee. Additional voice minutes can be purchased in increments of 50 minutes for \$5 (\$0.10 per minute), 200 minutes for \$10 (\$0.05 per min), 500 minutes for \$20 (\$0.04 per min), 800 minutes for \$30 (\$0.038 per min), and 1,500 minutes for \$50 (\$0.38 per min).

CD staff does not recommend approval of AmeriMex's *68 Minutes Plan*, *125 Minutes Plan*, and *250 Minutes Plan* because they would cost a low-income customer more when purchasing additional minutes than subscribing to other higher-minute federal Lifeline wireless plans currently available.

²² Resolution T-17339 Ordering Paragraph 3.

Before commencing its federal Lifeline wireless operations in California, AmeriMex must perform with all of the following:

- AmeriMex will file required annual reports and compliance reports with the FCC and the Commission, as directed;
- AmeriMex will comply with 47 C.F.R. § 54.401(d) by filing the required information directly with USAC to certify that its federal Lifeline wireless plans meet federal requirements under the USAC administration. AmeriMex is obligated to report within 30 days of receipt from USAC that compliance has been achieved via a letter to the Director of CD including a copy of the information submitted to USAC and a copy of AmeriMex's certification of approval from the USAC;
- AmeriMex will provide marketing materials to the CPUC California LifeLine staff for review prior to distribution and advertising which will clearly label its plans as "*federal Lifeline service*";
- AmeriMex will continue to comply with CPUC User Fee and universal service public purpose program surcharge requirements. Failure to comply with fee and surcharge remittance requirements may lead to enforcement action including, but not limited to, revocation of AmeriMex's ETC designation and/or wireless identification registration authority;
- AmeriMex will file a copy of updated ZIP+4 code data list with the Director of CD and the California LifeLine Administrator; and,
- AmeriMex will post safety-concerns about wireless telephone service coverage limitations on distributed materials and on its company website.

COMMENTS

In compliance with P.U. Code § 311(g), the Commission emailed a notice letter on October 31 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.

CD did not receive comments on this resolution.

FINDINGS AND CONCLUSIONS

1. AmeriMex Communications Corporation, doing business as "*SafetyNet Wireless*," is a prepaid wireless service provider that resells the services of Sprint and Verizon Wireless through its agreement of Ready Mobile, LLC. Its principal offices are at 1007 Mansell Road, Suite A, Roswell, GA 30076.
2. On July 30, 2013, the Commission issued AmeriMex Communications Corporation., its Wireless Identification Registration number U-4458-C allowing it

to operate as a commercial mobile radio service (CMRS) provider to the public in California.

3. On September 11, 2013, AmeriMex Communications Corporation filed Tier III Advice Letter (AL) 2 requesting ETC designation to offer only federal Lifeline prepaid wireless service to eligible customers doing business as "*SafetyNet Wireless*." AmeriMex proposed three Lifeline-only offerings to which it will apply the \$9.25 federal support amount.
4. On AmeriMex Communications Corporation only seeks federal Lifeline support and does not seek California LifeLine fund support.
5. On March 27, 2014, AmeriMex Communications Corporation filed AL Supplement 2A, and withdrew 2A on June 19, 2014.
6. On July 31, 2014, AmeriMex Communications Corporation filed AL Supplement 2B requesting to add two additional Lifeline-only plans.
7. On August 29, 2014, AmeriMex filed AL Supplement 2C clarifying specific details of its advice letter and to address its commitments to program requirements.
8. On October 10, 2014, AmeriMex filed AL Supplement 2D to add supporting discussion about its reseller agreements with three underlying carriers, Sprint, Verizon, and T-Mobile; to submit a Shapefile of the proposed T-Mobile service area; and, to emphasize its process working with its underlying carriers to provide service in a reasonable time to potential customers within the approved service area but who may be outside the network.
9. To ensure that AmeriMex complies with its obligation to provide service to prospective Lifeline customers within the network service area pursuant to FCC rules, CD staff recommends that the Commission require AmeriMex to submit an Information Only report quarterly to the Communications Division Director. The report shall include: a description of each customer service request; the dates of the request; the disposition of the request; method(s) used to provide service (e.g., modifying or replacing customer equipment, deploying a roof-mounted antenna or other equipment, adjusting the nearest cell tower or network or customer facilities, reselling services from another carrier's facilities, or employing, leasing or constructing an additional cell site); and, the date of completion.
10. AmeriMex Communications Corporation shall file all federal compliance reports, including but not limited to the Form 481 and 47 C.F.R § 54.422 annually as required, and provide copies of these reports to this Commission when they are filed with the FCC and USAC.

11. AmeriMex Communications Corporation shall file the required service plan information pursuant to 47 C.F.R. § 54.401(d) with the Universal Service Administrative Company (USAC). Once accepted by USAC, a copy of the information submitted to USAC and a copy of AmeriMex Communications Corporation's certification of approval from the USAC shall be provided to the Communications Division Director within 30 days of receipt from USAC.
12. AmeriMex Communications Corporation meets the Federal Communications Commission's Eligible Telecommunications Carrier requirements.
13. AmeriMex Communications Corporation requested waivers of California LifeLine service elements: (4) the ability to receive free incoming calls, (10) choice of flat-rate or measured-rate service, (11) free provision of one directory listing per year, (12) availability of free white pages telephone directory, (15) free access to 800 and 800-like toll-free numbers, and (21) access to two residential telephone lines if a low-income household with a disabled person requires both lines to access California LifeLine.
14. It is reasonable to grant waivers for California LifeLine elements (4), (10), (11), (12), and (15) because they do not apply to wireless service providers and the Commission has granted such waivers in the past to other federal Lifeline wireless service providers.
15. It is reasonable to deny AmeriMex's request for a waiver to California LifeLine element (21) because other federal Lifeline wireless providers comply with this service element currently and because Decision 14-01-032 maintains this element as a requirement in the California LifeLine rules for wireless carriers (*Attachment D, Appendix A-2, service element (17)*).
16. AmeriMex Communications Corporation commits to comply with all General Order 153 rules including the Lifeline enrollment process, working with California's Third Party Administrator (TPA) to establish customer eligibility, and to cooperate with the California LifeLine team in the review and approval of its federal Lifeline advertisement materials.
17. AmeriMex Communications Corporation commits to comply with General Order 153's application, verification, and renewal processes to establish customer eligibility with the California LifeLine Administrator and will not offer federal Lifeline wireless plans to customers until the California LifeLine Administrator approves their Lifeline eligibility.
18. AmeriMex Communications Corporation will label clearly its wireless offerings as *federal Lifeline service* to minimize customer confusion between the California LifeLine and federal Lifeline programs, to include adequate information about the potential coverage and service quality issues, and to provide copies to

Communications Division of all marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures, for CPUC California LifeLine staff to review and approval prior to publication and distribution. We find this recommendation reasonable and adopt it.

19. AmeriMex Communications Corporation commits to comply with CPUC User Fee and universal service public purpose program surcharge requirements. Failure to comply with fee and surcharge remittance requirements may lead to enforcement action including, but not limited to, revocation of AmeriMex Communications Corporation's Eligible Telecommunications Carrier designation and/or wireless identification registration authority.
20. AmeriMex Communications Corporation will utilize the ZIP+4 code data of the Small LECs' service areas to ensure that current customers of the Small LECs are not accepted as its federal Lifeline customers. We find this recommendation reasonable and adopt it.
21. AmeriMex Communications Corporation shall be authorized to receive from the Small LECs an updated ZIP+4 code data in their corresponding service areas within 30 days of the effective date of this Resolution. AmeriMex Communications Corporation shall also be authorized to receive from the Small LECs, on an as-needed basis, any update to the ZIP+4 code data to AmeriMex Communications Corporation, as with all other wireless designated ETCs in California. AmeriMex Communications Corporation shall file a copy of any updated ZIP+4 code data with the Communications Division Director and the California LifeLine Administrator (CLA). The ZIP+4 code data shall be provided in an MS Excel file (xls) format via email to the CD director and to the CLA in a format specified by the CLA.
22. Communications Division finds that AmeriMex Communications Corporation's *501 Minutes and 1,000 Minutes Plans* meet federal ETC criteria for public interest determination with the benefits of increased competitive choice, convenience, security with mobility, ability to purchase additional usage, and ability to send and receive text messages in a prepaid plan.
23. Communications Division finds these AmeriMex Communications Corporation's federal Lifeline wireless plans to have equal or better value in its Lifeline plan pricing for low-income customers:
 - *501 Minutes & Free Phone Plan* for \$5.75 per month with additional minutes costing \$0.05 each.
 - *1,000 Minutes & Free Phone Plan* for \$12.65 per month.
24. Communications Division finds, when using the average minutes of use analysis, AmeriMex Communications Corporation's *68 Minutes Plan, 125 Minutes Plan, and*

250 Minutes Plan to be more expensive when compared to other currently available federal Lifeline wireless and therefore does not recommend approval.

25. Communications Division conducted due diligence review to determine AmeriMex Communications Corporation's fitness as it relates to business practice behavior and customer protection that may call into question its fitness to be granted ETC designation to serve California consumers. Communications Division found no fitness issues.
26. The Commission may pursue an enforcement action which may include fines, penalties, and the revocation of ETC designation and/or wireless identification registration authority should substantive issues emerge after this ETC is approved which raises public interest questions about AmeriMex Communications Corporation's operations.
27. For public safety reasons, AmeriMex Communications Corporation shall clearly inform Lifeline customers that coverage limitations may affect wireless mobile service including E-911/911 emergency calls. Disclosures shall include, but are not limited to, clear statements on all marketing materials and the company website.
28. AmeriMex Communications Corporation shall file a Tier II Advice Letter to request approval for any future changes to the federal Lifeline wireless plans approved in this Resolution since these are not based on a retail plan currently available to all prospective customers at the time of filing. Such request shall demonstrate that the changes comply with Resolution T-17002, i.e. *Appendix A-Sections II-E: Local Usage* and *II-G. Public Interest Determination*, all applicable General Order 153 rules, and pricing rules pursuant to Decision 10-11-033 or as modified and/or updated by subsequent Decisions and/or Resolutions effective at the time of the request. We find Communications Division's recommendation reasonable and adopt it.
29. Communications Division recommends that AmeriMex Communications Corporation file a Tier II Advice Letter to request approval to changes to its approved service area and include a map(s) in Shapefile format of the proposed area.
30. On October 31, 2014, the Commission emailed a draft of this resolution to the eligible telecommunications carrier service list for public comments.
31. Communications Division did not receive comments on this resolution.

THEREFORE, IT IS ORDERED that:

1. The Commission conditionally approves AmeriMex Communications Corporation's (U-4458-C), doing business as "*SafetyNet Wireless*," request for an eligible telecommunications carrier (ETC) designation to provide federal Lifeline prepaid wireless service throughout California in the service areas of the uniform regulatory framework carriers, excluding the small local exchange carrier (Small LECs) service areas.
2. AmeriMex Communications Corporation's ETC designation approval shall be contingent upon the following: 1) AmeriMex Communications Corporation shall file required annual reports and compliance reports with the Federal Communications Commission and this Commission, as directed; 2) AmeriMex Communications Corporation shall submit to the Communications Division Director a copy of the information submitted to Universal Service Administrative Company and a copy of AmeriMex Communications Corporation's certification of approval from the USAC within 30 days of receipt from USAC of its compliance with 47 C.F.R. § 54.401(d) related to its federal Lifeline wireless plan; 3) AmeriMex Communications Corporation shall submit its marketing materials to the CPUC California LifeLine staff for approval prior to distribution and publication; and, 4) AmeriMex Communications Corporation shall clearly identify its wireless mobility safety content on all distributed federal Lifeline materials and on the company website.
3. AmeriMex Communications Corporation shall be authorized to offer federal Lifeline wireless service plans doing business as "*SafetyNet Wireless*":
 - *501 Minutes & Free Phone Plan* for \$5.75 per month.
 - *1,000 Minutes & Free Phone Plan* for \$12.65 per month.Lifeline-only customers can purchase additional airtime minutes in denominations of \$5 for 100 minutes (\$0.05 per minute), \$10 for 200 minutes (\$0.05 per minute), and \$25 for 300 minutes (\$0.083 per minute).
4. AmeriMex Communications Corporation shall use a Tier II Advice Letter to request approval for any future changes to these federal Lifeline plans which are not based on a retail plan. Such request shall demonstrate that the changes comply with Resolution T-17002, i.e. *Appendix A-Sections II-E: Local Usage* and *II-G. Public Interest Determination*, all applicable General Order 153 rules, and pricing rules pursuant to Decision 10-11-033 or as modified and/or updated by subsequent Decisions and/or Resolutions effective at the time of the request.
5. AmeriMex Communications Corporation shall file a Tier II Advice Letter to request approval for any changes to its approved service area and include a map(s) in Shapefile format of the proposed area.

6. AmeriMex Communications Corporation shall comply with General Order 153's enrollment application, verification, and renewal processes under the review of the California LifeLine Administrator which establishes customer eligibility.
7. AmeriMex Communications Corporation shall be authorized waivers for these five requested service elements of California LifeLine: (4) the ability to receive free incoming calls; (10) choice of flat-rate or measured-rate service; (11) free provision of one directory listing per year, (12) availability of free white pages telephone directory, and (15) free access to 800 and 800-like toll-free numbers.
8. AmeriMex Communications Corporation shall clearly label its offerings as *federal Lifeline service* to minimize customer confusion between the California LifeLine and federal Lifeline programs, shall include adequate information about the potential coverage and service quality issues, and shall provide copies of all marketing materials including, but not limited to, customer service representative scripts, internet marketing, and posters and brochures for Communications Division's California LifeLine staff review and approval prior to distribution of marketing publications.
9. AmeriMex Communications Corporation shall implement the ZIP+4 codes to screen customers and ensure that current customers of the Small LECs are not accepted as federal Lifeline wireless customers with AmeriMex Communications Corporation.
10. AmeriMex Communications Corporation shall be authorized to receive from the Small LECs an updated list of the ZIP+4 code data in their service areas within 30 days of the effective date of this Resolution. AmeriMex Communications Corporation shall also be authorized to receive from the Small LECs on an as-needed basis any update to the ZIP+4 code data to AmeriMex Communications Corporation, the same as with all other active wireless designated ETCs in California. A copy of any updated ZIP+4 code data shall be filed with the Communications Division Director and the California LifeLine Administrator. The ZIP+4 code data shall be provided in an MS Excel file (.xls) format via email to the Communications Division Director and to the CLA in a format specified by the CLA.
11. AmeriMex Communications Corporation shall submit to the Communications Division Director an Information Only report quarterly of service requests from customers living in the designated service area but outside of its existing network coverage. The report would include: a description of each customer service request; the dates of the request; the disposition of the request; method(s) used to provide service (e.g., modifying or replacing customer equipment, deploying a roof-mounted antenna or other equipment, adjusting the nearest cell tower or network or customer facilities, reselling services from another carrier's facilities,

or employing, leasing or constructing an additional cell site); and, the date of completion.

12. AmeriMex Communications Corporation shall comply with all applicable Commission rules and regulations including the reporting and payment of Public Utilities Commission User Fees and universal service public purpose program surcharges. Failure to do so may result in the revocation of its ETC designation and wireless identification registration authority to operate in 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 December 4, 2014, the following Commissioners voting favorably thereon:

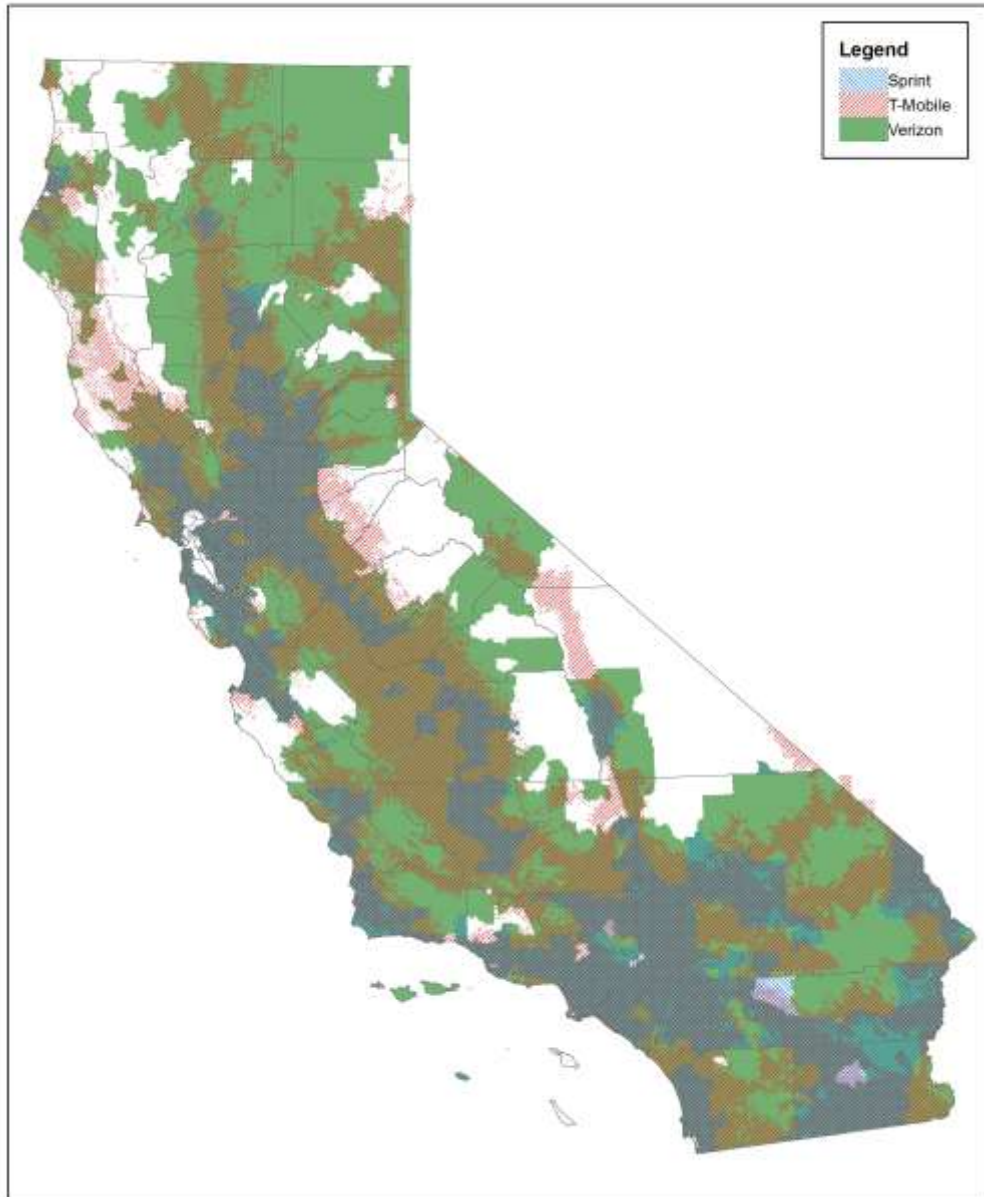
PAUL CLANON
Executive Director

Resolution T- 17455
CD/ABA

APPENDIX A
Resolution T-17455

Attachment A
Resolution T-17455
AmeriMex Communications Corporation
doing business as *SafetyNet Wireless*

Proposed Service Area for Federal Lifeline Wireless
ETC Service in California
AmeriMex



Attachment B
Resolution T-17455
AmeriMex Communications Corporation
doing business as *SafetyNet Wireless*

General Order 153 – Service Elements of California LifeLine

California LifeLine is composed of the service elements set forth below. All California LifeLine subscribers are entitled to receive every one of the service elements of California LifeLine, and every California LifeLine Service Provider is required to offer all of the service elements of California LifeLine to each of its subscribers. The service elements of California LifeLine are as follows:

- 1 Access to (a) single party local exchange service or (b) service that is equivalent, in all substantial respects, to single party local exchange service.
- 2 Access to all interexchange carriers offering service in the California LifeLine subscriber's local exchange.
- 3 Ability to place calls.
- 4 Ability to receive free unlimited incoming calls.
- 5 Free touch-tone dialing.
- 6 Free unlimited access to 911/E-911.
- 7 Access to local directory assistance (DA). Each California LifeLine Service Provider shall offer to its subscribers the same number of free DA calls that the California LifeLine Service Provider provides to its non-California LifeLine residential customers.
- 8 Access to foreign Numbering Plan Areas.
- 9 California LifeLine rates and charges.
- 10 Customer choice of local Flat-Rate Service or Measured-Rate Service. The 14 small ILECs identified in D. 96-10-066 do not have to offer subscribers the choice of local Flat or Measured-Rate Service, unless the small ILEC offers this option to its non-California LifeLine residential customers.
- 11 Free provision of one directory listing per year as provided for in D. 96-02-072.
- 12 Free white pages telephone directory.
- 13 Access to operator service.
- 14 Voice grade connection to the public switched telephone network.
- 15 Free access to 800 or 800-like toll-free services.
- 16 Access to telephone relay services as provided for in Public Utilities Code §2881 et seq.
- 17 Toll-free access to customer service for information about California LifeLine, service activation, service termination, service repair, and bill inquiries.
- 18 Toll-free access to customer service representatives fluent in the same language (English and non-English) in which California LifeLine was originally sold.
- 19 Free access to Toll-Blocking Service.
- 20 Free access to Toll-Control Service but only if (i) the California LifeLine Service Provider is capable of offering Toll-Control Service and (ii) the California LifeLine subscriber has no unpaid bill for toll service.
- 21 Access to two residential telephone lines if a low-income household with a disabled person requires both lines to access California LifeLine.
- 22 Free access to the California Relay Service via the 711 abbreviated dialing code.

GO 153 (Effective December 1, 2011 - D.10-11-033, Resolution T-17321)