

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight and Programs Branch**

**RESOLUTION T-17338
December 15, 2011**

RESOLUTION

RESOLUTION T-17338. This Resolution grants the request of YourTel America, Inc. (U-4409-C) to be designated as an Eligible Telecommunications Carrier providing wireless federal Lifeline and Link-Up services throughout California in the service areas of the Uniform Regulatory Framework carriers excluding the Small Incumbent Local Exchange Carriers' service areas.

SUMMARY

By this Resolution, the California Public Utilities Commission (CPUC or Commission) grants the request of YourTel America, Inc. (U-4409-C) (YourTel) to be designated as an Eligible Telecommunications Carrier (ETC) for the purpose of offering wireless federal Lifeline and Link-Up services to qualifying customers throughout California in the service areas of the Uniform Regulatory Framework (URF) carriers¹ excluding the Small Incumbent Local Exchange Carriers² (Small ILECs) service areas. YourTel's request complied with: the ETC designation requirements pursuant to Resolution T-17002, applicable requirements of General Order (G.O.) 153 regarding basic service elements of California LifeLine, enrollment and pricing rules, and applicable requirements for a CPUC certificated or registered carrier such as, but not limited to, reporting and payment of CPUC user fees and Public Purpose Program (PPP) surcharges. We find that the request is reasonable and consistent with the public interest, and should be granted.

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

² The Small ILECs group is composed of Calaveras Telephone Co (U-1004-C), Cal-Ore Telephone Co. (U-1006-C), Ducor Telephone Co. (U-1007-C), Sebastian (Foresthill Telephone Co. (U-1009-C) and Kerman Telephone Co. (U-1012-C)), Happy Valley Telephone Co. (U-1010-C), Hornitos Telephone Co. (U-1011-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.

BACKGROUND

Pursuant to federal law, state commissions or the Federal Communications Commission (FCC) designate telephone corporations as ETCs.³ The FCC then authorizes the ETC to receive federal Universal Service Fund (USF) support for providing local telephone service in high-cost areas and to low-income customers.

The FCC established the ETC program to satisfy the statutory requirement of the Telecommunications Act of 1996.⁴ The federal USF support creates an incentive for the telephone carriers to provide quality residential telephone services at an affordable rate to low-income consumers and/or those living in designated high-cost areas, e.g., rural areas.

In Resolution T-17002, the Commission adopted *The Comprehensive Procedures and Guidelines for ETC Designation and Requirements for ETCs* that are consistent with the FCC Orders 97-157 and 05-46 regarding designation of a telephone carrier as a qualified ETC. All carriers seeking ETC designation in California are required to comply with the applicable requirements for a CPUC certificated or registered carrier.

In addition to reviewing ETC designation requests for compliance with the federal and CPUC ETC requirements, the Communications Division (CD) staff reviews the requests for compliance with the CPUC California LifeLine rules contained in G.O. 153 and Decision (D.) 10-11-033. CD staff also reviews the request for compliance with other state regulatory requirements for telephone corporations operating in California, including but not limited to reporting and paying CPUC user fees and PPP surcharges, and submitting required reports.

G.O. 153 implements the Moore Universal Telephone Service Act, and contains California LifeLine service requirements for wireline carriers offering basic residential telephone service in California, including twenty-two elements of California LifeLine service that carriers must provide.

On November 19, 2010, the Commission adopted D. 10-11-033, which made changes to the California LifeLine program. The decision allows California LifeLine customers to choose alternative/non-traditional providers, such as wireless, for California LifeLine

³ Section 214 (e)(2) of the Telecommunications Act authorizes state commissions to designate ETC status for federal universal service purposes. Although the CPUC does not have jurisdiction over market entry and rates of wireless carriers, FCC 97-157, ¶ 147 states that “[n]othing in section 214(e)(1), however, requires that a carrier be subject to the jurisdiction of a state commission in order to be designated as an ETC.” Therefore, the CPUC has authority to designate a wireless carrier as an ETC in California.

⁴ 47 U.S.C. Section 214(e)

service⁵ and adopted minimum price floors for California LifeLine offerings. In addition, wireless carriers may offer California LifeLine on a voluntary basis pursuant to D.10-11-033, subject to the afore-mentioned twenty-two basic service elements of California LifeLine listed in Appendix A of G.O. 153.

At this time, the Commission does not have specific California LifeLine rules for wireless carriers. CD recommends that until the Commission adopts California LifeLine rules for wireless service providers in Phase II of Rulemaking (R.) 06-05-028 and/or R.09-06-019 or some other proceedings, all wireless federal Lifeline offerings must comply with applicable policies and rules of G.O. 153 and D.10-11-033. Once the CPUC adopts basic service rules for the offering of wireless California LifeLine, wireless ETCs must comply with those rules.

YourTel is a Missouri based company with principal offices at 2800 East 18th Street, Kansas City, Missouri 64127. On March 25, 2011, the Commission issued YourTel its Wireless Identification Registration (WIR) number U-4409-C allowing it to operate as a reseller of Commercial Mobile Radiotelephone Services (CMRS) to the public in California. YourTel has complied with the regulatory requirements for telephone corporations operating in California including, but not limited to, reporting CPUC user fees and PPP surcharges, and submitting required reports.

SUBJECT OF ADVICE LETTER/FILING

On April 8, 2011, YourTel filed its Tier III Advice Letter (AL) No. 1 requesting limited ETC status for the purpose of offering federal Lifeline and Link-Up services in the service areas of the URF carriers in California. YourTel does not intend to provide service in the Small ILECs' service areas. YourTel does not seek federal Universal Service High-Cost Support or California LifeLine fund support. In the AL No. 1, YourTel provided information to comply with the requirements for ETC designation adopted in Resolution T-17002. YourTel also provided information regarding its proposed wireless federal Lifeline service offerings.

On July 6, 2011, YourTel filed AL supplement No. 1A that did the following: a) provided additional information on how it would comply with the requirements of G.O. 153 enrollment and renewal processes; b) withdrew its proposed federal Lifeline service offerings included in AL No. 1; c) proposed four new wireless federal Lifeline service offerings; d) offered four wireless retail service offerings; and e) included additional information to document the service territory in which it plans to provide service, i.e., a list of exchanges and the location of cell towers operated by its underlying wireless provider, i.e., Sprint. YourTel also requested a waiver from six basic service

⁵ See D. 10-11-033, mimeo, at 72

elements of G.O. 153 California LifeLine related to the following: (1) the ability to receive free incoming calls, (2) a customer choice of flat rate local service or measured rate local service, (3) free provision of one directory listing per year, (4) availability of free white pages telephone directory, (5) free access to Directory Assistance (DA) calls and (6) free access to 800 and 800-like toll-free numbers.

On September 28, 2011, YourTel filed AL supplement No. 1B providing a map in .shp format showing its proposed service area and identified the cell site locations of one of its underlying wireless carrier, Sprint. YourTel was unable to provide the cell site locations of Verizon Wireless because Verizon Wireless deemed the information proprietary.⁶

On October 11, 2011, YourTel filed AL supplement No. 1C modifying one of its proposed wireless federal Lifeline service plans. The AL supplement modified the YourTel Lifeline 500 minute plan from \$10.00 to \$5.00. All other YourTel's proposed wireless federal Lifeline plans remain unchanged.

NOTICE/PROTEST

In compliance with G.O. 96-B, YourTel's AL No. 1, supplement No. 1A, 1B, and 1C were posted on the CPUC Daily Calendar on April 15, 2011, July 15, 2011, October 3, 2011, and October 14, 2011, respectively. The AL No. 1 and supplements No. 1A, 1B and 1C were served via email on April 14, 2011, July 5, 2011, September 27, 2011 and October 10, 2011, respectively, to the AL's service list.

No protests were received.

DISCUSSION

YourTel's request to be designated as an ETC must satisfy Commission requirements for designation as an ETC pursuant to Resolution T-17002, *The Comprehensive Procedures and Guidelines for ETC Designation*. YourTel has demonstrated compliance with the requirement in Appendix A of Resolution T-17002 regarding ETC designation for federal Lifeline and Link-Up support, e.g., requirements to submit maps, commit to provide the services supported by the USF, demonstrate its ability to remain functional in an emergency situation, and commit to satisfy consumer protection and service quality standards. Since YourTel only seeks to participate in the federal Lifeline and Link-Up program and does not intend to draw from the federal High-Cost Fund

⁶ YourTel was unable to obtain the cell site information from Verizon Wireless because Verizon Wireless deemed the information as proprietary. A copy of YourTel's correspondence with Verizon Wireless has been reviewed by CD staff.

program, YourTel is not required to meet the requirements contained in Appendix A: Section II-B: *Two-Year Service Quality Improvement Plan* and Resolution T-17002 Appendix B: *Comprehensive Reporting Requirements for ETCs to receive federal High-Cost Support*.

YourTel offers the services that are approved by the federal universal support mechanisms in the service areas where it plans to offer federal Lifeline and Link-Up support. The services supported by the universal service support mechanisms include the following:

- 1) Single party service;
- 2) Voice grade access to the public switched network;
- 3) Local usage;
- 4) Dual tone multi-frequency signaling or its functional equivalent;
- 5) Access to emergency services;
- 6) Access to operator services;
- 7) Access to interexchange services;
- 8) Access to directory assistance; and
- 9) Toll limitation for qualifying low-income consumers.

YourTel will provide its wireless federal Lifeline service offerings throughout California excluding the Small ILECs' service areas. YourTel will provide these services using a combination of its own facilities and resale of another wireless carrier's services, i.e., Sprint and Verizon Wireless.

As a designated ETC, YourTel commits to using media of general distribution to comply with Appendix A: Section I -E of Resolution T-17002 and Title 47 Code of Federal Regulations (C.F.R.) Section 54.201. YourTel commits to advertising the availability of the supported services to the general public within its designated ETC service areas through the internet, direct mail, TV radio advertising, YourTel retail outlets and neighborhood agents. In addition, YourTel pledges that it would clearly distinguish in its advertising and marketing its wireless federal Lifeline service offering from California LifeLine services. It also committed to work with CPUC California LifeLine staff in developing appropriate advertising materials promoting YourTel's wireless federal Lifeline service offerings.

CD recommends that YourTel be required to clearly label its offering as wireless federal Lifeline to minimize customer confusion between the California LifeLine and the federal Lifeline programs, i.e., customers are only allowed one Lifeline subsidy and current California subscribers will lose the California LifeLine benefit to their wireline account if they subscribed to a wireless federal Lifeline service. Prior to publication and providing wireless federal Lifeline service, CD recommends that YourTel be required

to provide the CPUC California LifeLine team copies of all marketing materials, including but not limited to customer service representative scripts, internet marketing, posters and brochures, for review and approval.

CD also recommends that as a condition of being granted ETC designation, that YourTel be required to file another ETC designation request if it plans to expand its service area designation to include service areas not covered by this Resolution.

Comparable Local Usage

Neither the CPUC nor the FCC has adopted minimum local usage standards or number of minutes to measure comparability. However, the FCC encourages state commissions to consider whether an ETC offers a local usage plan comparable to those offered by the incumbents in examining whether the ETC applicant provides adequate local usage to receive designation as an ETC. The FCC has not prevented states from determining the minimum number of local usage minutes for an applicant to be awarded ETC status.⁷

Consequently, CD used G.O. 153 call allowance rules and D.10-11-033 pricing rules for Measured Rate (MR) California LifeLine service as a baseline in evaluating YourTel's request regarding the comparable local usage requirement. In Resolution T-17266, Ordering Paragraph (O.P.) 3, the Commission approved the use of G.O. 153 for evaluating wireless carriers' requests for ETC designation.

YourTel has proposed the following wireless federal Lifeline service offerings for California:

- Plan 1: 250 minutes for \$2.50 per month
- Plan 2: 500 minutes for \$5.00 per month⁸
- Plan 3: 750 minutes for \$15.00 per month
- Plan 4: 1000 minutes for \$20.00 per month

YourTel has an activation charge for its retail wireless service of \$60.00 and proposes to charge eligible wireless federal Lifeline customers a discounted rate of \$30.00 for the activation charge with an option of deferring payment over a twelve-month period with no interest. Customers are allowed to purchase additional minutes for \$0.033 per minute.

All wireless federal Lifeline plans would include text messaging and text messages would be assessed at a rate of one minute per text sent or received. YourTel proposes no rollover minutes with any of the plans listed above. Unused minutes would expire

⁷ FCC 05-46, ¶ 34

⁸ AL supplement No. 1C modified the 500 minute plan rate from \$10.00 to \$5.00.

at the end of each month on the service expiration date.⁹ Directory Assistance (DA) calls would be charged \$1.50 per call and customers would be charged usage minutes.

YourTel's wireless federal Lifeline customers who do not timely pay their bills will be granted a grace federal subsidy amount of \$10.00. Once the customer's account exceeds that amount, YourTel proposed to suspend the customer's account and services until payment is received.¹⁰

YourTel proposed to provide all customers¹¹ a refurbished E911 compliant wireless handset at no charge.

Besides the wireless federal Lifeline service offerings, YourTel proposes to provide retail plans for its customers.¹² The following would be YourTel's retail plans:

- Retail Plan 1: 250 minutes for \$20.00 per month
- Retail Plan 2: 500 minutes for \$30.00 per month
- Retail Plan 3: 750 minutes for \$40.00 per month
- Retail Plan 4: 1000 minutes for \$50.00 per month

In addition, customers would be allowed to purchase additional minutes for \$0.033 per minute. All of YourTel's wireless federal Lifeline plans include text messaging and text messages would be assessed at a rate of one minute per text sent or received, with no rollover minutes for any of the plans listed above. Unused minutes would expire at the end of each month on the service expiration date.¹³

⁹ July 12, 2011, YourTel's Responses to Staff Question 3: Service Expiration Date is defined by YourTel as the 30-day anniversary of the date upon which the customer began service or loaded additional minutes.

¹⁰ July 12, 2011, YourTel's Responses to Staff Question 4: The customer account will stay in suspension for a maximum of 30 days. After expiration of this period, YourTel will deactivate the customer's account. YourTel will not seek reimbursement from USAC for the amount not paid by the customer.

¹¹ YourTel originally stated in its AL that it will provide a free handset to all qualified customers. However, upon CD staff's clarification, YourTel responded via email on October 19, 2011 that it will provide a free handset to both retail and qualified wireless federal Lifeline customers.

¹² Wireless carriers offering wireless Federal Lifeline service are required to provide a retail plan because of the requirements of the enrollment process pursuant to G.O. 153 § 4.2.

¹³ July 12, 2011, YourTel's Response to Staff Question 3: What is the definition of Service Expiration Date? "The 30-day anniversary of the date upon which the customer began service or loaded additional minutes. For example, under the YourTel Lifeline 250 plan, a customer will be allocated 250 minutes when he/she begins federal Lifeline service. Any minutes not used within 30 days will expire but an additional 250 minutes will be added for the next month of service. In another example, if a subscriber to YourTel's Lifeline 250 plan purchases 300 additional minutes during a 30-day service period, then those minutes will expire 30 days after the date they are purchased."

Consistent with the comparable local usage analysis used in Nexus wireless and Virgin mobile ETC designation Resolutions,¹⁴ CD concludes that YourTel's proposed wireless federal Lifeline service offerings are all comparable to the Incumbent Local Exchange Carriers (ILEC) MR California LifeLine service and approved wireless ETC service already being offered in California. The table below shows a summary comparison of YourTel's service offerings with ILEC MR California LifeLine service offerings based on 769 Minutes of Use (MOU).¹⁵ (See Attachment A of this Resolution for calculation details.)

Table 1: Estimated Cost of YourTel's Proposed Wireless federal Lifeline Service Offerings Compared to G.O. 153 ILEC MR Calculated Costs for 769 MOU

	YourTel 250 Minutes for \$2.50	YourTel 500 Minutes for \$5	YourTel 750 Minutes for \$15	YourTel 1000 Minute for \$20	AT&T Estimate per G.O. 153¹⁶	Verizon Estimate per G.O. 153
Wireless federal Lifeline and California LifeLine Plans Cost to Customer with 769 MOU	\$19.63	\$13.88	\$15.63	\$20.00	\$23.07 to \$24.23	\$23.07 to \$24.23
Caller ID, Call Waiting, Long Distance, Voicemail and Tax Cost	\$0	\$0	\$0	\$0	\$17.06 to \$17.09	\$31.47 to \$31.50
Total Cost to Wireless federal Lifeline and California LifeLine Customers for 769 MOU with additional features	\$ 19.63	\$13.88	\$15.63	\$20.00	\$ 40.12 to \$41.32	\$ 54.53 to \$55.73

CD believes that YourTel's proposed wireless federal Lifeline service offerings would provide customers significant cost savings over the off-the-shelf retail wireless YourTel plans and other wireless carriers' plans, i.e., Metro PCS, AT&T Wireless and Verizon Wireless (See Attachment B of this Resolution.) Therefore, CD recommends the

¹⁴ Resolution T-17258, Nexus Wireless ETC designation in California, pp. 6-10, and Resolution T-17284, Virgin Mobile ETC designation in California, pp. 6-9

¹⁵ 769 MOU reflects calculated average local wireless usage based upon FCC and CTIA Data. CD used wireless MOU, average bill, and average revenue per MOU data for the six-month period ending December 31, 2008 from Table 19 of the FCC's 14th Mobile Wireless Competition Report to Congress (14th Report) and data for the same period from the Cellular Telecommunications Industry Association's (CTIA) Semi-Annual Wireless Industry Survey. CD used the 2008 data because the FCC data ended then, even though the CTIA data continued through the six-month period ending June 30, 2010.

¹⁶ Price range reflects California LifeLine MR \$2.50 floor and \$3.66 cap prices established in D. 10-11-033. CD could not find an AT&T package that contained all the elements YourTel has included in its packages. Neither AT&T nor Verizon packages include Call Waiting.

approval of all YourTel's proposed wireless federal Lifeline service offerings listed above.

CD considers it important to ensure that low-income customers continue to receive adequate wireless service at a reasonable price. Therefore, CD recommends that YourTel and other existing wireless ETC in California be required to file a Tier II Advice Letter¹⁷ in order to obtain approval of any changes to its approved wireless federal Lifeline rate plans included in its respective Resolutions that granted ETC designation. Such a 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 G.O 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.

Public Interest Determination

Before designating a carrier as an ETC, the Commission must determine that doing so would be in the public interest.¹⁸ CD staff believes that YourTel has demonstrated that it would be in the public interest for the company to be designated as an ETC. YourTel has met the requirements in Appendix A: Section II - G: *Public Interest Determination* of Resolution T-17002 by the following: a) demonstrating the ETC designation will increase consumer choices; b) explaining the advantages and disadvantages of its service offerings; and c) showing the absence of creamskimming.¹⁹

a. The ETC designation will increase consumer choices

YourTel's ETC designation would increase choices for competitively priced wireless federal Lifeline plans for low-income California residents.

b. The advantages and disadvantages of its service offerings

YourTel would be offering a unique, customer-friendly, flexible and highly-affordable wireless telecommunications service, which would be available to qualified customers who either have no other service alternatives or who choose a wireless prepaid solution.

¹⁷ G.O. 96-B

¹⁸ FCC 05-46, paragraph 40, CPUC Resolution T-17002 Appendix A, Section II-G: Public Interest Determination

¹⁹ *Virginia Cellular Order*, *supra* note 18, para. 32 n.102 (citation omitted). *See also Highland Cellular Order*, *supra* note 28, para. 26: "Creamskimming" refers to the practice of targeting only the customers that are the least expensive to serve, thereby undercutting the ILEC's ability to provide service throughout the area."

The disadvantages of any wireless Lifeline service offering, including YourTel's, is the potential that the customer will have poor mobile reception due to weather conditions, terrain, or gaps in service coverage. CD believes that customers can exercise judgment in determining whether YourTel's wireless service meets the needs given the customer's specific circumstances and location. To assist customers in their decision making, CD recommends that YourTel provide adequate information to its customers through its wireless federal Lifeline advertising about the potential coverage and service quality issues customers may encounter if the customer opts to select a wireless federal Lifeline service offering versus a California LifeLine wireline service.

c. The absence of creamskimming

Creamskimming is not an issue with YourTel's request to be designated as an ETC because it is not requesting federal High-Cost support. YourTel's designation as an ETC would not increase the amount of funding drawn from the federal USF, unless it attracts additional new low-income customers.

In addition to the public interest criteria established by the FCC, CD considered the total cost of each of YourTel's proposed service offerings to low-income customers using an average estimate of MOU per month. CD finds that all of YourTel's proposed federal Lifeline service offerings are in the public interest because it offers the low-income customer significant cost savings over the off-the-shelf retail offerings available and it is comparable with the available wireless federal Lifeline service offerings in California.

CD believes that it is also in the public interest to ensure that all telephone corporations operating in California complies with other state regulatory requirements, including but not limited to reporting and paying CPUC user fees and PPP surcharges, and submitting required reports. YourTel has complied with the regulatory requirements for telephone corporations operating in California including, but not limited to, reporting CPUC user fees and PPP surcharges, and submitting required reports.

CD concludes that YourTel's request is in the public interest. In addition, CD recommends that YourTel be required to continue complying with all applicable Commission rules, including the reporting and paying of CPUC user fees and PPP surcharges. Failure to do so may result in revocation of ETC designation and as well as YourTel's as well as operating authority in California.

G.O. 153 Basic Elements of Service Compliance

YourTel's service offerings do not meet six of the twenty-two basic elements of California LifeLine set forth in G.O. 153 (*see* Attachment C of this Resolution for a complete list). YourTel has requested a waiver from the following requirements:

1. Ability to receive free incoming calls
2. Customer choice of flat rate local service or measured rate local service
3. Free provision of one directory listing per year
4. Availability of free white pages telephone directory
5. Free access to Directory Assistance (DA) calls
6. Free access to 800 and 800-like toll-free numbers

YourTel proposed to charge its wireless federal Lifeline customers \$1.50 for each DA calls. In addition, customers would incur usage minutes during the DA calls. Although YourTel is providing free access to 800 and 800-like toll-free numbers, customers would incur usage minutes for these types of calls.

Consistent with the Commission's findings in the Nexus wireless and Virgin Mobile ETC designation Resolutions,²⁰ CD recommends that YourTel be authorized to waive the six basic service elements of California LifeLine listed above with respect to its wireless federal Lifeline services only until such time that the Commission has established additional basic service rules for wireless in the current California LifeLine and/or California High-Cost Fund B rulemaking proceedings.²¹ The authorized waiver will have no bearing on California LifeLine offerings.

Compliance with G.O. 153 Application and Renewal Requirements, and Demonstrating how it will Exclude Wireless Federal Lifeline Subsidies to Small ILECs Customers

CD believes that G.O. 153 § 4.2 California LifeLine enrollment procedures provide a reasonable means for wireless carriers to determine if a prospective low-income customer is eligible for wireless federal Lifeline service. Therefore, until the Commission establishes rules for wireless ETC applicants in California, CD recommends that G.O. 153 California LifeLine application and renewal rules continue to be used in evaluating wireless carrier ETC designation requests.

²⁰ Resolution T-17258, Nexus Wireless ETC designation in California, pp. 11-13 and Resolution T-17284, Virgin Mobile ETC designation in California, pp. 12-14

²¹ R.09-06-019

G.O. 153 requires that a renewal form be sent annually to California LifeLine customer to determine continued eligibility.²² In California, application and renewal functions are performed by the California LifeLine Administrator (CLA).²³ CD recommends that YourTel be required to comply with G.O. 153 requirements, including the enrollment, and CLA application and renewal processes, and that YourTel will provide regular retail wireless service and not provide wireless federal Lifeline service until the low-income customer has been enrolled by the CLA.

YourTel does not seek ETC designation in the service areas of the Small ILECs. Consistent with Resolution T-17284, YourTel requests that the Commission order the Small ILECs to provide a list of the zip code + four data²⁴ associated with the Small ILECs service areas. YourTel will utilize the data to ensure that it is not providing services to customers residing in the Small ILECs services areas.

CD recommends that YourTel be required to comply with requirements in G.O. 153 pertaining to California LifeLine enrollment, as well as the CLA application and renewal processes. CD also recommends that the Small ILECs be required to provide YourTel and all current wireless ETCs updated zip code + four data of the Small ILECs service areas²⁵ within 30 days of the effective date of this Resolution. The Small ILECs shall also be required to provide, on an as-needed basis, any update to the zip code + four data to YourTel and all other wireless designated ETCs in California. A copy of any updated zip code + four data shall be filed with the CD Director and the CLA. The zip code + four data shall be provided in an MS Excel file (xls) format via email to the CD director. The Small ILECs shall provide the CLA the zip code + four data in a format specified by the CLA.

CD considers it appropriate for the Commission to rely on the Small ILECs to monitor for instances where they believe YourTel or any other wireless carrier is providing wireless federal Lifeline services to any Small ILECs customers. Should such instances arise, the Small ILECs can raise any related concerns about YourTel or any other wireless carrier's behavior or practices in the Small ILECs' service areas for Commission

²² G.O. 153, §§ 4.4 and 4.5

²³ G.O. 153, § 4.2.1. The current California LifeLine Administrator is Solix.

²⁴ Zip code + 4 is the standard Zip Code with a four digit add-on code. This ad-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 ILECs' territories. The screening can be accomplished by using the list of Zip Code + four for the Small LEC service areas.

²⁵ On July 5, 2011, the Small ILECs filed with the CPUC the zip code + four data pursuant to Resolution T-17284. On July 6, 2011, Frontier Communications West Coast, Inc. filed the zip code + four data for its service areas pursuant to T-17284.

review. If the matter cannot be resolved informally, the Small ILECs can file a formal complaint with the Commission.

Universal Service Administrative Company (USAC) Certification Requirements

CD recommends that, upon approval of this Resolution, YourTel be required to file information with the USAC, pursuant to 47 C.F.R. Section 54.401 (d), demonstrating that its wireless federal Lifeline service meets FCC requirements, and identifying the number of qualifying low-income customers and the amount of state assistance (if applicable). CD also recommends that YourTel be required to certify to the USAC that it shall pass through the entire federal subsidy amount to qualifying low-income customers. A copy of YourTel's certification with the USAC shall be provided to the CD Director within 30 days of receipt from USAC by YourTel.

The Commission concurs with CD's recommendations in this Resolution and grants YourTel's request for ETC designation for the purpose of offering federal Lifeline and Link-Up services throughout California in the service areas of the URF carriers excluding the Small LEC service areas.

COMMENTS

Public Utilities Code Section 311(g)(1) requires that the Commission (1) serve a draft Resolution on all parties, and (2) make that draft Resolution available for public review and comment for a period of 30 days or more, prior the Commission's vote on the draft Resolution. On November 15, 2011, the Commission distributed a draft of this Resolution for comments to the utilities and other interested parties. *See* Attachment D of this Resolution for the Draft Resolution T-17338 Service List.

FINDINGS AND CONCLUSIONS

1. On April 8, 2011, YourTel America, Inc. (U-4409-C) filed AL No. 1 requesting ETC designation to provide wireless federal Lifeline and Link-Up services to qualifying customers throughout California in the service areas of the URF carriers excluding the Small ILECs service areas.
2. On July 6, 2011, YourTel filed AL supplement No. 1A that provides additional information required to comply with the requirements of ETC designation.

3. On September 28, 2011, YourTel filed AL supplement No. 1B providing a map in .shp format showing its proposed service area and identified the cell site locations of one of its underlying wireless carrier, Sprint. YourTel was unable to provide the cell site locations of Verizon Wireless because Verizon Wireless deemed the information proprietary.
4. On October 11, 2011, YourTel filed AL supplement No. 1C modifying one of its proposed wireless federal Lifeline service plan. The AL supplement modified the YourTel Lifeline 500 minute plan from \$10.00 to \$5.00. All other YourTel proposed wireless federal Lifeline plans remain unchanged.
5. YourTel, a facilities-based wireless service provider, is a Missouri based company with principal offices at 2800 East 18th Street, Kansas City, Missouri 64127. On March 25, 2011, the Commission issued YourTel its Wireless Identification Registration (WIR) number U-4409-C allowing it to operate as a reseller of CMRS to the public in California.
6. YourTel has complied with the regulatory requirements for telephone corporations operating in California, including, but not limited, to reporting CPUC user fees and PPP surcharges, and submitting required reports.
7. YourTel has met all the requirements for federal Lifeline and Link-Up ETC status providing service throughout California excluding the Small ILECs service area found in Resolution T-17002, e.g., requirements to submit maps, a commitment to provide the services supported by the USF, a demonstration of its ability to remain functional in an emergency situation, and a commitment to satisfy consumer protection and service quality standards.
8. YourTel will provide USF supported services through a combination of its own facilities and the resale of another wireless carrier's service.
9. YourTel is not seeking federal High-Cost Fund Support or California LifeLine fund support.
10. YourTel proposed to offer the following wireless federal Lifeline service offerings: Plan 1: 250 minutes for \$2.50 per month, Plan 2: 500 minutes for \$5.00 per month, Plan 3: 750 minutes for \$15.00 per month, and Plan 4: 1000 minutes for \$20.00 per month.
11. CD recommends that YourTel and other existing wireless ETC in California be required to file a Tier II Advice Letter to obtain approval of any changes to their approved wireless federal Lifeline rate plans included in their respective Resolutions that granted ETC designation. Such a 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 G.O 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.

12. CD recommends that YourTel's request to be designated as an ETC to offer wireless federal Lifeline and Link-Up services throughout California in the service areas of the URF carriers excluding the Small ILECs service areas is in the public interest.
13. CD also recommends that YourTel be required to file another ETC designation request if it plans to expand its service area designation to include service areas not covered by this Resolution.
14. It is reasonable to use Commission rules and policies for California LifeLine service, including D. 10-11-033 and G.O. 153 for evaluating ETC designation requests, including federal Lifeline offerings by wireless carriers until the Commission adopts specific rules for wireless California LifeLine offerings.
15. YourTel has requested a waiver to the six basic service elements of California LifeLine related to the following: (1) the ability to receive free incoming calls, (2) a customer choice of flat rate local service or measured rate local service, (3) free provision of one directory listing per year, (4) availability of free white pages telephone directory, (5) free access to Directory Assistance (DA) calls and (6) free access to 800 and 800-like toll-free numbers.
16. CD recommends authorizing YourTel a waiver from the six basic service elements of California LifeLine, as described above, until such time that the Commission has established additional basic service rules in the current California LifeLine and California High-Cost Fund B rulemaking proceedings. The authorized waiver will have no bearing on California LifeLine offerings.
17. CD recommends requiring YourTel to comply with G.O. 153 Section 4.2 California LifeLine enrollment process, CLA application and renewal processes to establish customer's eligibility, and that YourTel not be allowed to begin offering wireless federal Lifeline service to customers until the application and renewal process has been put into place with CLA and is operational.
18. CD recommends requiring YourTel to clearly label its wireless federal Lifeline services to minimize customer confusion between the California LifeLine and federal Lifeline programs, include adequate information about the potential coverage and service quality issues, and to provide copies of all marketing

materials, including but not limited to customer service representative scripts, internet marketing, posters and brochures, to CPUC California LifeLine staff for review and approval prior to publication and providing wireless federal Lifeline service.

19. CD recommends requiring YourTel to utilize the zip code + four data of the Small ILECs service areas to ensure that current customers of the Small ILECs are not accepted as YourTel federal Lifeline customers.
20. CD recommends requiring the Small ILECs to provide YourTel and all wireless ETCs updated zip code + four data for their service areas within 30 days of the effective date of this Resolution. CD recommends that the Small ILECs also be required to provide, on an as-needed basis, any update to the zip code + four data to YourTel and all other wireless designated ETCs in California. A copy of any updated zip code + four data shall be filed with the CD Director and the CLA. The zip code + four data shall be provided in an MS Excel file (xls) format via email to the CD director. The Small ILECs shall provide the CLA the zip code + four data in a format specified by the CLA.
21. CD recommends requiring the Small ILECs to monitor for instances where they believe YourTel or any other wireless carrier providing wireless federal Lifeline services to any Small ILECs customers. The Small ILECs can raise any related concerns about YourTel or any other wireless carrier's behavior or practices in the Small ILECs' service areas for Commission review. If the matter cannot be resolved informally, the Small ILECs can file a formal complaint with the Commission.
22. CD recommends that YourTel be required to continue complying with all applicable Commission rules, including the reporting and paying of CPUC user fees and PPP surcharges. Failure to do so may result in revocation of ETC designation and as well as YourTel's as well as operating authority in California.
23. On November 15, 2011, the Commission distributed a draft of this Resolution for comments to the Resolution T-17338 Service List (*See Attachment D of this Resolution*).

THEREFORE, IT IS ORDERED that:

1. YourTel America, Inc. (U-4409-C) (YourTel) request for Eligible Telecommunications Carrier (ETC) designation to provide wireless federal

Lifeline and Link-Up services throughout California in the service areas of the Uniform Regulatory Framework (URF) carriers excluding the Small Incumbent Local Exchange Carriers (Small ILECs) service areas is granted.

2. YourTel shall offer all of its wireless federal Lifeline service offerings: Plan 1: 250 minutes for \$2.50 per month, Plan 2: 500 minutes for \$5.00 per month, Plan 3: 750 minutes for \$15.00 per month, and Plan 4: 1000 minutes for \$20.00 per month.
3. YourTel shall file another ETC designation request if it plans to expand its service area designation to include service areas not covered by this Resolution.
4. YourTel and other existing wireless ETC in California shall be required to file a Tier II Advice Letter to obtain approval of any changes to its approved wireless federal Lifeline service offerings included in their respective Resolutions that granted ETC designation. The 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 G.O 153 rules and pricing rules pursuant to Decision (D.) 10-11-033 or as modified and or updated by subsequent Decisions and/or Resolutions effective at the time of the request.
5. Until the Commission adopts specific rules for wireless California LifeLine offerings, General Order (G.O.) 153 shall continue to be used in evaluating ETC designation requests by wireless carriers, including federal Lifeline application and renewal. Once the Commission adopts wireless specific California LifeLine rules, YourTel shall be required to comply with those rules.
6. YourTel shall comply with G.O. 153 Section 4.2 California LifeLine enrollment process, California LifeLine Administrator (CLA) application and renewal processes to establish customer's eligibility, and will not be allowed to begin offering wireless federal Lifeline service to customers until the application and renewal process has been put into place with the CLA and is operational.
7. YourTel is authorized a waiver from the six basic service elements of California LifeLine related to the following: (1) the ability to receive free incoming calls, (2) a customer choice of flat rate local service or measured rate local service, (3) free provision of one directory listing per year, (4) availability of free white pages telephone directory, (5) free access to Directory Assistance (DA) calls and (6) free access to 800 and 800-like toll-free numbers, until such time that the Commission has established additional basic service rules for wireless in the current California LifeLine and/or California High-Cost Fund B rulemaking proceedings. The authorized waiver will have no bearing on California LifeLine offerings.

8. YourTel shall clearly label its offering as wireless federal Lifeline to minimize customer confusion between the California LifeLine and federal Lifeline programs, include adequate information about the potential coverage and service quality issues, and provide copies of all marketing materials, including but not limited to customer service representative scripts, internet marketing, posters and brochures, to CPUC California LifeLine staff for review and approval prior to publication and providing wireless federal Lifeline service.
9. YourTel shall implement the zip+4 codes to screen customers and ensure that current customers of the Small ILECs are not accepted as YourTel's federal Lifeline customers.
10. The Small ILECs shall be required to provide YourTel and all wireless ETCs an updated list of the zip code + four data in their service areas within 30 days of the effective date of this Resolution. The Small ILECs shall also be required to provide, on an as-needed basis, any update to the zip code+ four data to YourTel and all other wireless designated ETCs in California. A copy of any updated zip code + four data shall be filed with the Communications Division (CD) Director and the CLA. The zip code + four data shall be provided in an MS Excel file (xls) format via email to the CD director. The Small ILECs shall provide the CLA the zip code + four data in a format specified by the CLA.
11. The Small ILECs shall monitor for instances where they believe YourTel or any other wireless carrier providing wireless federal Lifeline services to any Small ILECs customers. The Small ILECs can raise any related concerns about YourTel or any other wireless carrier's behavior or practices in the Small ILECs' service areas for Commission review. If the matter cannot be resolved informally, the Small ILECs can file a formal complaint with the Commission.
12. YourTel shall certify to the Universal Service Administrative Company (USAC) that it will pass through the entire federal subsidy amount to qualifying low-income customers. A copy of YourTel's certification with the USAC shall be provided to the CD Director within 30 days of receipt from USAC by YourTel.
13. YourTel shall comply with Commission rules, including reporting and paying of California Public Utilities Commission (CPUC) user fees and Public Purpose Program (PPP) surcharges. Failure to do so may result in revocation of ETC designation and as well as YourTel's operating authority 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 15, 2011, the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

ATTACHMENT A

Comparison of YourTel's Proposed Wireless Federal Lifeline Plans to
Existing Wireless ETCs and ILEC California LifeLine Measured Rate Plans
(Assuming Average Wireless MOU of 769)

	YourTel 250	Yourtel 500	YourTel 750	YourTel 1000	Telscape Wireless 300	Telscape Wireless 1000	Virgin Mobile	Nexus 250	Nexus 500	Nexus 1000	Cricket unlimited	AT&T Lifeline MR (minimum)	AT&T Lifeline MR (maximum)	Verizon Lifeline MR (minimum)	Verizon Lifeline MR (Maximum)
Avg. MOU	769	769	769	769	769	769	769	769	769	769	769	769	769	769	769
Basic Plan Minutes (allowance)	250	500	750	1000	300	1100	1000	250	500	1000	unlimited	146	146	146	146
Avg. Excess MOUs	519	269	19	0	469	0	0	519	269	0	0	623	623	623	623
Cost per Min in excess of allowance	\$0.033	\$0.033	\$0.033	\$ 0.033	\$0.030	\$0.030	\$0.100	\$0.033	\$0.033	\$0.033	\$ -	\$0.033	\$0.033	\$0.033	\$0.033
Cost of excess minutes	\$ 17.13	\$ 8.88	\$ 0.63	\$ -	\$14.07	\$ -	\$ -	\$17.13	\$ 8.88	\$ -	\$ -	\$20.57	\$20.57	\$20.57	\$20.57
Min. Lifeline Plan Cost (per D.10-11- 033) or Cost per Plan	\$2.50	\$5.00	\$15.00	\$20.00	\$2.50	\$ 20.00	\$20.00	\$2.50	\$5.00	\$20.00	\$21.50	\$2.50	\$3.66	\$2.50	\$3.66
Total G.O.153 Cost to Customers	\$19.63	\$13.88	\$15.63	\$20.00	\$16.57	\$20.00	\$20.00	\$19.63	\$13.88	\$20.00	\$21.50	\$23.07	\$24.23	\$23.07	\$24.23
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 769 MOU and additional costs of vertical features	\$19.63	\$13.88	\$15.63	\$20.00	\$16.57	\$20.00	\$20.00	\$19.63	\$13.88	\$20.00	\$21.50	\$40.13	\$41.32	\$54.54	\$55.73

ATTACHMENT B

Comparison of YourTel Lifeline plans, YourTel Retail Plans and Other Wireless Retail Plans

	YourTel Lifeline 250	YourTel Lifeline 500	YourTel Lifeline 750	YourTel Lifeline 1000	YourTel Retail 250	YourTel Retail 500	YourTel Retail 750	YourTel Retail 1000	Virgin Mobile: Pay Lo 1500	Nexus dba Reach Out Wireless Simple Plan 1000	Metro PCS: Unlimited	AT&T: Go Phone: Unlimited text and talk	Sprint Talk: 450	Verizon Talk: 450
Avg. MOU*	769	769	769	769	769	769	769	769	769	769	769	769	769	769
Basic Plan Minutes (allowance)	250	500	750	1000	250	500	750	1000	1500	1000	Unlimited	Unlimited	450	450
Avg. Excess MOUs	519	269	19	0	519	269	19	0	0	0	0	0	319	319
Cost per Min in excess of allowance	\$0.033	\$0.033	\$0.033	\$0.033	\$0.033	\$0.033	\$0.033	\$0.033	\$0.10	\$0	\$0	\$0	\$0.45	\$0.45
Cost of excess minutes	\$17.13	\$8.88	\$0.63	\$0.00	\$17.13	\$8.88	\$0.63	\$0.00	\$0	\$0	\$0	\$0	\$143.55	\$143.55
Cost of Additional features: Caller ID, Voicemail, Call Waiting, Long Distance	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Cost per Plan	\$2.50	\$5.00	\$15.00	\$20.00	\$20.00	\$30.00	\$40.00	\$50.00	\$30.00	\$52.95	\$40.00	\$60.00	\$39.99	\$44.99
Cost to Customer with Average Usage	\$19.63	\$13.88	\$15.63	\$20.00	\$37.13	\$38.88	\$40.63	\$50.00	\$30.00	\$52.95	\$40.00	\$60.00	\$183.54	\$188.54

ATTACHMENT C
YourTel Advice Letter 1A, Exhibit 8
Compliance with GO 153 Basic Service Elements of Lifeline

No.	Service Element of LifeLine	Complied?	Comments
1)	Access to single party local exchange service that is substantially equivalent to single party local exchange service.	Yes	
2)	Access to all interexchange carriers offering service in the LifeLine customer's local exchange.	Yes	
3)	Ability to place calls	Yes	
4)	Ability to receive free incoming calls	No	
5)	Free touch-tone dialing	Yes	
6)	Free unlimited access to 911/E-911	Yes	
7)	Access to local directory assistance (DA). Each utility shall offer its LifeLine customers the same number of free DA calls that it provides to its non-LifeLine customers.	Yes	YourTel charges \$1.50 per DA call and usage minutes are /are deducted.
8)	Access to foreign Numbering Plan Areas.	Yes	
9)	LifeLine rates and charges.	Yes	
10)	Customer choice of flat-rate local service or measured-rate local service. The 17 smaller LECs identified in D. 96-10-066 do not have to offer LifeLine customers the choice unless they offer the choice to their non-LifeLine customers.	No	YourTel offers wireless plans with a given number of minutes for a fixed price.
11)	Free provision of one directory listing per year as provided for in D. 96-02-072.	No	There is not a publicly available directory for subscribers of wireless service.
12)	Free white pages telephone directory	No	Wireless carriers do not provide this resource.
13)	Access to operator service.	Yes	
14)	Voice grade connection to the public switched telephone network.	Yes	
15)	Free Access to 800 or 800-like toll-free services.	No	No additional charge for 8YY access; usage minutes deducted.
16)	Access to telephone relay services as provided for in PU Code § 2881 et seq.	Yes	
17)	Toll free access to customer service for information about LifeLine, service activation, service termination, service repair, and bill inquires.	Yes	
18)	Toll free access to customer service representatives fluent in the language (English and non-English) the LifeLine service was originally sold in.	Yes	
19)	Free access to toll blocking service.	NA	Provides toll limitation as required by FCC Rules
20)	Free access to toll control service, but only if (i) the utility is capable of offering toll-control service, and (ii) the LifeLine customer has no unpaid bill for toll service.	NA	
21)	Access to two residential telephone lines if a low-income household with a disabled person requires both lines to access LifeLine	Yes	
22)	Free access to the California Relay Service via 711 abbreviated dialing code.	Yes	

ATTACHMENT D

Resolution T-17338 Service List (November 15, 2011)

UTILITY NAME	EMAIL
Skadden, Arps, Slate, Meagher & Flom LLP	john.beahn@skadden.com
Citizens Telecommunications Co. Of Ca.	Charlie.Born@FTR.com
Citizens Telecoms. Co. Of Golden State	Charlie.Born@FTR.com
Citizens Telecoms. Co. Of Tuolumne	Charlie.Born@FTR.com
The Siskiyou Telephone Company	jtlowers@sisqtel.net
Happy Valley Telephone Co.	gail.long@tdstelecom.com
Hornitos Telephone Company	gail.long@tdstelecom.com
Winterhaven Telephone Company	gail.long@tdstelecom.com
Frontier Communications West Coast, Inc.	joe.chicoine@ftr.com
Sierra Telephone Company, Inc.	lindab@stcg.net
Calaveras Telephone Company	ysmythe@caltel.com
Cal-Ore Telephone Company	waihun@cot.net
Ducor Telephone Company	egwolfe@ducortelco.com
Foresthill Telephone Company, Inc.	dclark@kermantelephone.com
Global Valley Network, Inc.	susan.leclair@pinetreenetworks.com
Kerman Telephone Company	dclark@kermantelephone.com
Pinnacles Telephone Company	lorrie.bernstein@mossadams.com
Volcano Telephone Company	earlb@volcanotel.com
The Ponderosa Telephone Company	dand@ponderosatel.com
WWC License, LLC/Alltel/Western Wireless	nathan.glazier@alltel.com
AT&T California	regtss@att.com
Verizon California, Inc.	margo.ormiston@verizon.com
Frontier Communications of the Southwest	Charlie.Born@FTR.com
Connectto Communications	ccollier@telecompliance.net
TracFone Wireless, Inc	brecherm@gtlaw.com
Cricket Communications	suzannetoller@dwt.com
I-Wireless	lsteinhart@telecomcounsel.com
Nexus Communications	pacasciato@gmail.com
Virgin Mobile	john.beahn@skadden.com
Llela Tan-Walsh	Llela.Tan-Walsh@cpuc.ca.gov
Charles Christiansen	Charles.Christiansen@cpuc.ca.gov
Telco Service Quality	telcoservicequality@cpuc.ca.gov
Chris Witteman	Chris.Witteman@cpuc.ca.gov
Hien Vo	Hien.Vo@cpuc.ca.gov
Alik Lee	Alik.Lee@cpuc.ca.gov
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Telrite	Brian.lisle@telrite.com
Andrew Gipson (Telrite)	agipson@watkinsludlam.com
TAG Mobile	frank.delcol@tagmobile.net
Margarett Johnson (TAG)	mjohnson@watkinsludlam.com
Floyd Jasinski (SureWest TeleVideo)	f.jasinski@surewest.com