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December 12, 2013

VIA ELECTRONIC FILING

Burl W. Haar, Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East
Suite 350
St. Paul, MN 55101-2147

**Re: Petition of Tempo Telecom, LLC for Designation as an Eligible
Telecommunications Carrier in the State of Minnesota for the Limited
Purpose of Offering Lifeline Service to Qualified Households**

Dear Secretary Haar:

Tempo Telecom, LLC (“Tempo”), by its attorneys, hereby respectfully submits its Petition for Designation as an Eligible Telecommunications Carrier in the State of Minnesota for the Limited Purpose of Offering Lifeline Service to Qualified Households.

If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,



Angela F. Collins
Counsel for Tempo Telecom, LLC

**Before the
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of)	
Petition of Tempo Telecom, LLC for)	Docket No. _____
Designation as an Eligible)	
Telecommunications Carrier in the State of)	
Minnesota for the Limited Purpose of)	
Offering Lifeline Service to Qualified)	
Households)	

**PETITION OF TEMPO TELECOM, LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE STATE OF MINNESOTA FOR THE
LIMITED PURPOSE OF OFFERING LIFELINE SERVICE TO QUALIFIED
HOUSEHOLDS**

Tempo Telecom, LLC (“Tempo”), by its attorneys, and pursuant to Section 214(e)(2)¹ of the federal Communications Act of 1934, as amended (the “federal Act”), and Section 54.201² of the rules and regulations of the Federal Communications Commission (“FCC”),³ hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) by the Minnesota Public Utilities Commission (the “Commission”). Tempo seeks ETC designation for Lifeline support only to provide prepaid wireless services to qualifying Minnesota consumers. Tempo will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high cost areas.⁴ As demonstrated herein, Tempo meets all the statutory and regulatory requirements for designation as an ETC in the state of Minnesota.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. § 54.201.

³ Tempo files this Application in accordance with the rules adopted by the FCC in *Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“*Lifeline Reform Order*”) and *Connect America Fund; et al.*, 26 FCC Rcd 17663 (2011) (“*Connect America Fund Order*”).

⁴ Given that Tempo only seeks Lifeline support and does not seek any high-cost support, ETC certification requirements for the high-cost program are not applicable to Tempo.

I. OVERVIEW OF TEMPO

Tempo is a commercial mobile radio service (“CMRS”) provider that offers prepaid wireless voice and data services on a resold basis. Tempo does not own any wireless facilities or hold any FCC wireless licenses. In addition to prepaid wireless Lifeline service as an ETC, Tempo will also provide other prepaid wireless voice and data services in Minnesota.

In August 2012, Birch Communications, Inc. (“Birch”) received approval from the FCC of its Compliance Plan for the provision of prepaid Lifeline wireless service. A subsidiary of Birch, Ionex Communications North, Inc. dba Birch Communications, operates as a competitive local exchange carrier and interexchange carrier in Minnesota. The Compliance Plan noted there was an outstanding question as to whether a separate legal entity should be established to provide prepaid wireless Lifeline service or whether the service should be provided through one of the existing Birch entities.

On December 18, 2012, Birch notified the FCC that the prepaid wireless Lifeline service would be provided by a separate legal entity known as Now Communications, LLC (“Now Comm”). A copy of that filing is attached as **Exhibit 1** (without attachments) (“December 2012 FCC Filing”). In that filing, Now Comm committed to implement and comply with the Compliance Plan, and notified the FCC that it adopted the Compliance Plan as its own. The FCC acknowledged these changes in corporate structure on December 20, 2012 in a public notice attached as **Exhibit 2**. The FCC indicated that the Compliance Plan would apply to Now Comm.

Now Comm has since changed its name to Tempo Telecom, LLC. All other statements in the December 2012 FCC Filing apply equally to Tempo. On May 13, 2013, Tempo notified

FCC staff of its name change,⁵ and filed with the FCC an amended petition for ETC designation in the states for which the FCC handles such designations. Tempo also updated the FCC-approved Compliance Plan to reflect Tempo's adoption of the plan, which is attached as **Exhibit 3**. All changes made via the May 13 FCC Amendment are incorporated by reference into the Compliance Plan. On September 17, 2013, Tempo filed a letter with the FCC to formally notify the FCC that Tempo will comply with and adopt as its own the Compliance Plan filed by Birch, which was approved by the FCC. This letter is attached as **Exhibit 4** (without attachments).

Tempo will utilize the same procedures and operations set forth in the FCC-approved Compliance Plan for its provision of prepaid wireless Lifeline service. Except as modified herein and by the May 13 FCC Amendment, Tempo will offer the same prepaid wireless Lifeline service plan set forth in the Compliance Plan, and will market and advertise its prepaid wireless Lifeline service in the same manner as described in the Compliance Plan.

Tempo utilizes the same management and day-to-day operational personnel as currently utilized by Birch. Birch's current corporate officers also are corporate officers of Tempo, and Tempo is owned by the same ultimate owners of Birch, but is not part of the Birch corporate family. Birch Equity Partners, LLC (a Georgia limited liability company formerly known as Birch Capital, LLC) holds a 100% ownership interest in Tempo. The current owners of Birch (Holcombe Green and R. Kirby Godsey, who in combination hold approximately 75% interest in Birch) own approximately 80% of Birch Equity Partners, LLC, with the remaining percentage owned by Vincent Oddo, the Chief Executive Officer of both Birch and Tempo. Attached as

⁵ WC Docket No. 09-197, *Tempo Telecom, LLC Petition for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(6) of the Communications Act for Lifeline Support Only*, Tempo Telecom, LLC Amended Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act for Lifeline Support Only (filed May 13, 2013) ("May 13 FCC Amendment").

Exhibit 5 is a current list of Tempo's officers, along with biographical information for each, showing that it has the expertise necessary to provide the services specified herein.

Tempo has been granted ETC status in the states of Kansas, Missouri, South Carolina and Wisconsin. Tempo's request for ETC status is currently pending at the FCC for those states handled by the FCC, and in the states of Arkansas, California, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Mississippi, Nevada, New Jersey, Ohio, Washington, and West Virginia. Tempo has never been denied ETC designation by any state commission or by the FCC in connection with any state.

For purposes of providing its prepaid wireless Lifeline and non-Lifeline services, Tempo will resell the wireless services of Sprint, which provides wholesale capacity to many wireless resellers, including other prepaid wireless providers that have received ETC designation. Sprint will provide Tempo with the wireless network infrastructure and wireless transmission facilities needed for Tempo to offer service as a Mobile Virtual Network Operator ("MVNO").

Tempo will rely on Birch for all other facilities, network, back office, billing, and customer support functions necessary to provide both its Lifeline and non-Lifeline wireless services.⁶ Birch is a competitive local exchange carrier ("CLEC") and interexchange carrier ("IXC"), and since 1996 has been providing high-quality, cost-effective integrated communications services and related information technology services to residential and small and medium-sized business ("SMB") customers. Today, Birch offers a variety of products, services and tailored solutions including local voice, long distance voice, broadband Internet, converged Internet Protocol ("IP") solutions, and related telecommunications and IT services. In

⁶ For numerous years, Birch and its affiliates have been providing wireline Lifeline services in 18 states as a non-ETC reseller using resold services obtained from AT&T, and thus Birch is familiar with the eligibility and verification procedures applicable to Lifeline service offerings.

addition to Minnesota, the Birch family of companies is currently authorized to provide telecommunications services in 48 other states and the District of Columbia, with an application pending in Arizona.

Exhibit 6 contains information regarding Tempo's designated service area in Minnesota ("Service Area"). Specifically, Tempo's designated Service Area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the exchanges set forth in **Exhibit 6**. Tempo will serve any potential customer in the exchanges listed in **Exhibit 6** to the extent resold wireless services are available from Sprint in the customer's geographic area.

Pleadings, orders, notices and other papers filed or serviced in this matter should be served upon:

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II. TEMPO MEETS THE REQUIREMENTS FOR ETC DESIGNATION UNDER SECTION 214(e) OF THE FEDERAL ACT AND SECTION 54.201(d) OF THE FCC'S RULES

Under Section 214(e)(1) of the federal Act and Section 54.201(d) of the FCC's rules, a common carrier may be designated as an ETC if it (1) offers the services supported by federal universal service as determined by the FCC, (2) offers such services using its own facilities or a combination of its own facilities and resale of another carrier's services, and (3) advertises the availability of such services and the relevant charges using media of general distribution.⁷ As set forth below, Tempo meets these requirements.

⁷ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

A. Tempo Is a Common Carrier

Wireless carriers are common carriers under federal law.⁸ Common carriers that provide services consistent with the requirements of Section 214(e) may be deemed ETCs.⁹ Tempo will be a common carrier by virtue of its provision of wireless services. Therefore, Tempo certifies that it is a common carrier under 47 U.S.C. § 214(e)(1) for purposes of ETC designation.

B. Tempo Will Offer the Services Supported by Federal Universal Service

Pursuant to Section 54.101(a) of the FCC's rules, as modified by the *Lifeline Reform Order*, carriers seeking ETC designation must provide voice telephony services.¹⁰ Specifically, eligible Lifeline telephony services must provide voice grade access to the public switched telephone network ("PSTN") or its functional equivalent, minutes of use for local service provided at no additional charge, access to emergency 911 and enhanced 911 service in locations where implemented, and toll limitation at no charge (subject to certain requirements and limitations).¹¹ Tempo certifies that its prepaid wireless Lifeline service offering satisfies the FCC's definition of voice telephony service, and it will therefore provide all services designated for support by the FCC.

Tempo's prepaid wireless Lifeline service offering will provide voice grade access to the PSTN through its provision of resold wireless services from Sprint. As described below, Tempo's prepaid wireless Lifeline service offering will provide a specified number of minutes to eligible consumers at no additional charge. In addition, as explained below, Tempo's prepaid

⁸ 47 U.S.C. § 332(c)(1) (an entity providing commercial mobile services is deemed to be a common carrier); *see also* 47 U.S.C. § 332(d)(1) (defining "commercial mobile service" to be any mobile service that is provide for profit and makes interconnected service available to the public).

⁹ 47 U.S.C. § 214(e)(6) provides that wireless carriers not otherwise subject to state commission jurisdiction shall be designated as ETCs if they meet the requirements of 47 U.S.C. § 214(e)(1) consistent with applicable federal and state law.

¹⁰ 47 C.F.R. § 54.101(a); *Lifeline Reform Order* ¶ 48.

¹¹ *Lifeline Reform Order* ¶ 48.

wireless Lifeline service offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. Although Tempo understands it has an independent obligation to provide 911 and E911 services as a reseller,¹² Tempo will rely on its contractual arrangement with Sprint to provide such emergency services to consumers.

With respect to toll limitation service, the *Lifeline Reform Order* eliminated the requirement to provide toll limitation services if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.¹³ As explained more below, Tempo's prepaid wireless Lifeline service offering will be a nationwide calling plan, and will not distinguish between toll and non-toll calls. Consumers, however, may implement toll control for international calls to the extent they seek that capability. Moreover, consumers purchasing Tempo's prepaid wireless Lifeline service offering will have the ability to monitor their minute usage and balances from their handset, online, or through customer service.

C. Tempo Satisfies the Requirements for Conditional Forbearance from the Facilities Requirement

Both the federal Act and the FCC's rules require a carrier seeking ETC designation to offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services.¹⁴ In the *Lifeline Reform Order*, however, the FCC decided to conditionally forbear from application of the federal Act's facilities requirement to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program.¹⁵ Specifically, the FCC determined that conditional forbearance from the facilities requirement would apply if the carrier: (1) complied with certain 911 requirements and (2) filed

¹² 47 C.F.R. § 20.18(m).

¹³ *Lifeline Reform Order* ¶ 49.

¹⁴ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

¹⁵ *Lifeline Reform Order* ¶ 368.

and received approval of a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Lifeline Reform Order* as well as further safeguards against waste, fraud, and abuse as the Wireline Competition Bureau may deem necessary.¹⁶ Tempo certifies that it meets the requirements for conditional forbearance.

Tempo's prepaid wireless Lifeline service offering will comply with the 911 requirements outlined in the *Lifeline Reform Order* necessary for application of conditional forbearance. Tempo will provide its prepaid wireless Lifeline subscribers with 911 and E911 access regardless of activation status and availability of minutes. Tempo will also provide its Lifeline subscribers with E911-compliant handsets and replace, at no additional charge to the subscriber, any non-compliant handset. As noted above, Tempo will rely on its contractual arrangement with Sprint to provide 911 and E911 services to consumers.¹⁷ Tempo's MVNO arrangement with Sprint specifically addresses 911/E911 services, and Tempo will supply handsets that satisfy all FCC requirements.

In further support of Tempo's eligibility for the conditional grant of forbearance from the facilities requirement, Tempo provides a copy of its approved Compliance Plan in **Exhibit 3**, which was prepared in accordance with the requirements of the *Lifeline Reform Order* and the Public Notice issued by the Wireline Competition Bureau on February 29, 2012.¹⁸

D. Tempo Will Advertise the Availability of the Supported Services and the Relevant Charges Using Media of General Distribution

¹⁶ *Lifeline Reform Order* ¶ 368.

¹⁷ Tempo understands that it has an independent obligation to provide 911 and E911 services as a wireless reseller, and will utilize its underlying contractual arrangement with Sprint to meet that obligation. *See, e.g.*, 47 C.F.R. § 20.18(m); *Lifeline Reform Order* at n.989.

¹⁸ *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, 27 FCC Rcd 2186 (2012).

Tempo will publicize the availability of its prepaid wireless Lifeline service offering in a manner reasonably designed to reach those likely to qualify for the service.¹⁹ Tempo will utilize the FCC's 2004 outreach guidelines for advertising its prepaid wireless Lifeline service offering.²⁰ Specifically, Tempo will utilize outreach materials and methods designed to reach households that currently do not have telephone service, will develop advertising materials for non-English speaking populations within its service area, and will coordinate its outreach efforts with relevant government agencies.

Tempo's advertising for its prepaid wireless Lifeline service offering will include, but not be limited to, targeted direct mail, advertisements in daily and weekly print periodicals, billboards, and radio advertising. Tempo will also coordinate with relevant state agencies, community outreach organizations, and non-profit organizations to make information available regarding Tempo's prepaid wireless Lifeline service offering in resource guides and other printed materials produced by those organizations, as well as in their offices or other locations visited by potential Lifeline-eligible subscribers. Tempo will build on the existing relationships with these organizations that Birch has in connection with Birch's current wireline Lifeline service offering as a non-ETC reseller. Tempo will also advertise through online search engines and third-party referral agents/dealers. As required under the *Lifeline Reform Order*, Tempo will ensure the FCC-required disclosures, any DBA names it uses, and details of the prepaid wireless Lifeline service offering are contained in all marketing materials.²¹ An example of Tempo's marketing materials is attached as **Exhibit 7**.

III. TEMPO MEETS THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER SECTION 54.202 OF THE FCC'S RULES

¹⁹ 47 C.F.R. § 54.405(b).

²⁰ *Lifeline and Link Up*, 19 FCC Rcd 8302, ¶¶ 45-48 (2004).

²¹ *Lifeline Reform Order* ¶¶ 274-282.

Section 54.202 of the FCC's rules contains certain additional requirements for a common carrier to be designated as an ETC. As set forth below, Tempo satisfies each of those requirements.

A. Tempo Will Comply with the Service Requirements Applicable to Lifeline Support

Section 54.202(a)(1) of the FCC's rules requires a common carrier seeking ETC designation to (1) certify that it will comply with the service requirements applicable to the support that it receives and (2) submit a five-year plan for proposed improvements or upgrades to the applicant's network unless the applicant is seeking Lifeline support only.²² Tempo seeks ETC designation for Lifeline support only. Tempo hereby certifies that it will comply with the service requirements applicable to Lifeline support. Given that Tempo seeks designation for Lifeline support only, a five-year network improvement plan is no longer necessary.²³

B. Tempo Will Remain Functional in Emergency Situations

Pursuant to Section 54.202(a)(2) of the FCC's rules, a common carrier seeking ETC designation must demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.²⁴ Sprint will provide Tempo with the network infrastructure and wireless transmission facilities. The MVNO contract arrangement with Sprint imposes certain obligations on Sprint to ensure Tempo's prepaid wireless Lifeline

²² 47 C.F.R. § 54.202(a)(1).

²³ *Lifeline Reform Order* ¶ 386.

²⁴ 47 C.F.R. § 54.202(a)(2).

service offering remains functional during emergency situations.²⁵ As a large, nationwide wireless carrier, Sprint is subject to regulatory requirements to remain functional during emergency situations.²⁶ Tempo's MVNO agreement with Sprint also contains certain quality of service guarantees. As a result Tempo is able to provide to its customers the same ability to remain functional in emergency situations as currently provided by Sprint to its own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, re-routing of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Tempo will rely on Birch for all other facilities, network, back office, billing, and customer support functions needed to provide Lifeline and non-Lifeline services. Birch has been offering telecommunications services since 1996, and thus has significant experience with remaining functional in emergency situations. As a successful, profitable CLEC for over 15 years Birch has disaster recovery contingency plans that include diverse/alternate routing, electronics redundancy, dual data centers geographically separated, and environmental controls for data and switching centers. Tempo will rely on Birch to apply these same measures to its prepaid wireless Lifeline service offering to the extent there is an emergency situation affecting Tempo's operations.

C. Tempo Will Satisfy Applicable Consumer Protection and Service Quality Standards

Section 54.202(a)(3) of the FCC's rules requires a common carrier seeking ETC designation to demonstrate that it will satisfy applicable consumer protection and service quality

²⁵ While Sprint will provide the underlying wireless services to Tempo, Birch will provide to Tempo the billing services associated with the prepaid wireless Lifeline product to the Tempo end user customer. The Birch billing system will be served by two geographically separate data centers for back-up redundancy, one currently located in Macon, Georgia and the other in Emporia, Kansas.

²⁶ Tempo is also familiar with the continuity and disaster response program Sprint has implemented, which addresses the need to remain functional during emergency situations.

standards.²⁷ Tempo will satisfy applicable consumer protection and service quality standards. Tempo will apply Birch's consumer protection and service quality standards.²⁸ As a CLEC/IXC, Birch is currently subject to the consumer protection and service quality standards promulgated by the Commission and the states in which Birch operates. These same practices apply to Tempo's prepaid wireless Lifeline service product. Tempo will satisfy all consumer privacy protection standards as provided in 47 C.F.R. § 64, Subpart U as applicable and will protect Customer Proprietary Network Information ("CPNI") as required by state and federal law and will certify compliance with the same on an annual basis. Tempo will also comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service to satisfy this requirement.²⁹

D. Tempo Is Financially and Technically Capable of Providing Lifeline Services in Accordance with the FCC's Rules

Tempo has the financial and technical capability to provide Lifeline service. Section 54.202(a)(4) of the FCC's rules requires a common carrier seeking ETC designation for Lifeline support to demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules.³⁰ The FCC stated that the "relevant considerations" for satisfying this requirement would be whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant

²⁷ 47 C.F.R. § 54.202(a)(3). Pursuant to FCC rules, Tempo will annually certify that it is in compliance with applicable service quality standards and consumer protection rules. 47 C.F.R. § 54.422(b)(3).

²⁸ Birch's customer call centers also are located in Macon, Georgia and Emporia, Kansas. Birch has received recognition for its excellent customer service in the past. *See, e.g.*, "Birch Communications Receives Customer Service Recognition" (March 4, 2013), <http://www.birch.com/about/03042013.aspx>. Birch will apply those same customer service practices to Tempo customers.

²⁹ 47 C.F.R. § 54.202(a)(3).

³⁰ 47 C.F.R. § 54.202(a)(4); *see also Lifeline Reform Order* ¶ 387.

receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.³¹ Tempo satisfies these criteria.

Tempo is financially capable of offering Lifeline services. Tempo does not intend to rely exclusively on universal service fund disbursements to operate, and will receive revenues from other sources. Tempo offers prepaid wireless voice and data services across the United States. Tempo's core business will be the provision of wireless voice and data services to non-Lifeline customers. Based on its forward-looking business and financial plans, Tempo projects that the majority of its target customer base will not be eligible to receive Lifeline service.

Further, Tempo has sufficient operating capital to provide prepaid wireless Lifeline services. In May 2013, the individual owners of Birch Equity Partners, LLC (formerly known as Birch Capital, LLC) (Tempo's sole member) pledged a significant amount of funding to the company. Tempo started offering service in September 2013, and began accruing revenues from its prepaid non-Lifeline wireless voice and data services at that time.

As a new entity, Tempo has not been subject to any enforcement proceedings or ETC revocation proceedings. Birch has not been subject to an abnormal number of enforcement proceedings given the significant number of customers it serves and the more than 15 years it has been offering service, and has not been subject to any enforcement proceeding with respect to Lifeline services.

The management and ultimate owners of Tempo are intimately familiar with the financial and technical needs of a telecommunications company. As noted above, Tempo utilizes the same management and day-to-day operational personnel as currently utilized by Birch, a company that has been operating as a successful competitive local exchange carrier since 1996.

³¹ *Lifeline Reform Order* ¶ 388.

Birch's current corporate officers are also corporate officers of Tempo, and Tempo is owned by the same ultimate owners of Birch (but is not part of the Birch corporate family). In addition, Tempo relies on Birch for various network facilities, back office, billing, and customer support functions necessary for Tempo to provide both its Lifeline and non-Lifeline services.

Finally, Tempo is reselling the wireless services of Sprint for both its Lifeline and non-Lifeline services. Sprint provides wholesale capacity to numerous wireless resellers. Like several other prepaid wireless providers, Sprint will provide Tempo with the network infrastructure and wireless transmission facilities needed for Tempo to offer service as a MVNO. Sprint is a large, nationwide carrier, and serves several other MVNOs offering wireless Lifeline products.³² Tempo's partnership with Sprint further demonstrates Tempo is technically and financially capable of providing a prepaid wireless Lifeline service.

E. Tempo Will Provide Prepaid Wireless Lifeline Service Plans to Eligible Consumers

Section 54.202(a)(5) of the FCC's rules require a common carrier seeking ETC designation for Lifeline support to submit information describing the terms and conditions of the voice telephony plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges for toll calls (if any), and rates for each such plan.³³ At this time, Tempo plans to offer the following prepaid wireless Lifeline plans at no charge to the customer:

Lifeline 150

150 nationwide minutes with the ability to rollover unused minutes to the next month

Lifeline 250

250 nationwide minutes

³² Based on filings made with the FCC, it appears Sprint also provides underlying MVNO services to other carriers such as PlatinumTel, i-wireless, and CAL Communications, which also have sought ETC designation from the FCC.

³³ 47 C.F.R. § 54.202(a)(5).

Either option also will provide the customer with:

- Wireless handset (there are several handset options) - at least one free choice and the possibility of additional choices
- Voicemail
- National texting, with three (3) texts counting as one (1) minute of use
- 911 and E911 access as available
- Custom calling features such as call waiting, call forwarding, and caller ID
- Web/Internet usage, with 1 megabyte (MB) counting as two (2) minutes of use (Web/Internet access dependent on handset)
- Option for international calling with per-minute pricing based on the country to be called, which will be provided to the consumer when opting for this capability (will be offered in future)
- Option to purchase additional minutes (which can also be used for texting and Web/Internet access as described above) anytime during the month that are available for 30 days from purchase (and will carry over into the next month) at the following rates:

Additional Minutes	Price
60	\$5.95
100	\$9.95
200	\$14.95

There will be no initial connection charges or hookup fees, other than any that may be required by regulatory bodies.

The 800 number for customers to call to qualify for Lifeline services is 1-877-822-8501.

The rates, terms, and conditions of Tempo's Lifeline service are available at www.mytempo.com, and will be provided to customers upon enrollment in the Lifeline program. Voicemail, call waiting, call forwarding, and caller ID will be provided as part of the standard Lifeline service package at no additional charge to the Lifeline customer. Tempo also offers its customers access to operator services, the ability to make "long distance" telephone calls, and access to directory assistance services by dialing "411" through Birch's facilities or through

arrangements with Sprint.

Tempo's planned prepaid wireless Lifeline service offering is consistent with the federal Act's requirement that consumers have access to quality services at "just, reasonable, and affordable rates,"³⁴ and is consistent with the FCC's findings that Lifeline consumers should have the option to purchase bundled packages, additional calling features, and optional voice services.³⁵

IV. TEMPO MEETS THE REQUIREMENTS FOR LIFELINE SERVICES UNDER SECTION 54.405 OF THE FCC'S RULES

Under Section 54.405 of the FCC's rules, an ETC has certain obligations to offer Lifeline service.³⁶ Tempo understands these obligations and will meet them as described below.

A. Tempo Will Make Lifeline Service Available as Defined under the FCC's Rules

Section 54.405(a) of the FCC's rules requires an ETC to make available Lifeline service, as defined in Section 54.401 of the FCC's rules,³⁷ to qualifying low-income consumers.³⁸ Tempo certifies that its prepaid wireless Lifeline service offering will conform to the definition of "Lifeline" in the FCC's rules.

B. Tempo Will Publicize the Availability of Lifeline Service

Section 54.405(b) of the FCC's rules requires an ETC to publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.³⁹ As described above, Tempo will publicize the availability of its prepaid wireless Lifeline service

³⁴ 47 U.S.C. § 254(b)(1).

³⁵ *Lifeline Reform Order* ¶ 317.

³⁶ 47 C.F.R. § 54.405.

³⁷ 47 C.F.R. § 54.401.

³⁸ 47 C.F.R. § 54.405(a).

³⁹ 47 C.F.R. § 54.405(b).

offering in a manner reasonably designed to reach eligible consumers.

C. Tempo Will Include Certain Disclosures on Materials Describing Its Lifeline Service, Including the Name of the ETC

Sections 54.405(c) and (d) of the FCC’s rules require an ETC to make certain disclosures on all materials describing the Lifeline service offering, including the name of the ETC.⁴⁰ As noted above, Tempo will ensure that all materials describing its prepaid wireless Lifeline service offering use easily understood language to indicate that the service is a Lifeline service, that Lifeline is a government assistance program, that the service is non-transferrable, that only eligible consumers may enroll in the program, and that the program is limited to one discount per household as required under the rules.⁴¹ Tempo will also ensure that all materials describing its prepaid wireless Lifeline service offering utilize the Tempo brand as the name of the ETC providing services.⁴² Tempo understands that the term “materials describing the service” include all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms.⁴³

D. Tempo Will Comply with the FCC’s De-Enrollment Procedures

Section 54.405(e) of the FCC’s rules requires an ETC to impose certain de-enrollment procedures for Lifeline services.⁴⁴ Tempo will comply with the FCC’s de-enrollment procedures as described more fully in the Compliance Plan set forth in **Exhibit 3**. As discussed in the compliance plan, Tempo will de-enroll Lifeline customers for duplicative support, for non-usage, and for failure to re-certify, and will have general de-enrollment procedures in place.

⁴⁰ 47 C.F.R. § 54.405(c), (d).

⁴¹ 47 C.F.R. § 54.405(c).

⁴² 47 C.F.R. § 54.405(d).

⁴³ 47 C.F.R. § 54.405(c).

⁴⁴ 47 C.F.R. § 54.405(d).

V. TEMPO WILL COMPLY WITH THE FCC'S CONSUMER CERTIFICATION AND ANNUAL VERIFICATION AND RECERTIFICATION REQUIREMENTS

As discussed at length in its FCC-approved Compliance Plan, set forth in **Exhibit 3**, Tempo will offer its prepaid wireless Lifeline service to households receiving benefits from a qualifying state or federal assistance program or with an income at or below 135% of the Federal Poverty Guidelines.⁴⁵ Tempo certifies that will verify the eligibility of its Lifeline subscriber base after 2012⁴⁶ in accordance with Section 54.409 and 54.410 of the FCC's rules.⁴⁷ As set forth in the FCC-approved Compliance Plan, Tempo has established processes for ensuring Lifeline services are provided only to eligible customers, including procedures for confirming consumer eligibility, enrolling eligible customers, re-certifying eligibility at regular intervals, and recordkeeping. Tempo's certification form will collect identifying information about the prospective Lifeline recipient, certify his or her eligibility to receive it, and require the consumer to acknowledge the terms and conditions of the Lifeline program as delineated by the FCC.⁴⁸

Attached as **Exhibit 8** are updated versions of Tempo's initial enrollment and certification form (updated from those included in the FCC compliance Plan), which will also be used for re-certification as explained in Tempo's approved Compliance Plan. Tempo has revised its forms based on a request from FCC staff to include a statement that not all Lifeline services are marketed under the "Lifeline" name, and may be offered under other names, and to clarify that certain consumer information will be provided to the Universal Service Administrative Company for the purpose of verifying eligibility and maintaining the information in a database.

⁴⁵ 47 C.F.R. § 54.409(a).

⁴⁶ *Lifeline Reform Order* ¶ 133. As Tempo did not have a Lifeline subscriber basis as of June 1, 2012, the FCC's January 31, 2013 recertification requirement is inapplicable. *Id.* ¶¶ 130, 132 ("[T]he rule we adopt today will apply to all Lifeline subscribers enrolled in the program as of June 1, 2012").

⁴⁷ 47 U.S.C. §§ 54.409, 54.410.

⁴⁸ *See* 47 C.F.R. §§ 54.405(c), 54.409, 54.410(a)-(d); *Lifeline Reform Order* ¶ 121.

Tempo has made similar changes to its script for third party verification (“TPV”) of Lifeline eligibility, and has informed its customer service representatives to include these statements in any oral disclosures given to potential Lifeline customers. Tempo also confirms that it will comply with any future Commission, FCC, or USAC guidance, directives, or rule changes regarding the Lifeline program. As documented in **Attachment B** to the FCC-approved Compliance Plan, Tempo has designated an annual recertification process that fulfills the requirements set forth by Section 54.410(f) of the FCC’s rules.⁴⁹

VI. TO THE EXTENT REQUIRED, TEMPO WILL OBTAIN HANDSET CERTIFICATION FROM THE DEPARTMENT OF PUBLIC SAFETY

If required by the Commission, Tempo will submit a handset to the Department of Public Safety for a determination of whether its handsets are 911 and E911 compliant. Like the FCC, the Department of Public Safety requires handsets to be 911 and E911 capable, regardless of the activation status of the phone or the availability of plan minutes.⁵⁰ Tempo therefore affirms that it will submit a handset to the Department of Public Safety as required by the Commission.

VII. TEMPO’S INFORMATIONAL TARIFF WILL ADDRESS ALL APPLICABLE MINNESOTA CONSUMER PROTECTION AND SERVICE QUALITY STANDARDS

If required by the Commission, Tempo will submit an informational tariff that addresses all applicable Minnesota consumer protection and service quality standards. Minnesota R. 7812.0700 and Minn. R. 7810.0100 through 7810.6100 prescribe specific service quality standards and requirements for informational tariffs by telecommunications providers.⁵¹ Tempo

⁴⁹ 47 U.S.C. § 54.410(f). To fulfill the Commission’s annual reporting and certification requirements, Tempo certifies that it will maintain records to document compliance with all FCC and Commission requirements pursuant to FCC rules. 47 C.F.R. § 54.417(a). Tempo also certifies that it will comply with the FCC’s annual reporting rules promulgated by 47 C.F.R. § 54.422.

⁵⁰ Docket No. P-6863/M-11-314, *Petition of Virgin Mobile USA, L.P. for Designation as an Eligible Telecommunications Carrier*, Order Granting Limited ETC Designation (Dec. 7, 2012).

⁵¹ See Minn. R. 7812.0700; Minn. R. 7810.0100 through 7810.6100.

will address each requirement as it applies to its proposed provision of Lifeline wireless service in the informational tariff Tempo will submit to the Commission.

VIII. DESIGNATION OF TEMPO AS A LIFELINE-ONLY ETC IS IN THE PUBLIC INTEREST AND FULFILLS THE TELECOMMUNICATIONS GOALS UNDER MINNESOTA LAW

Section 54.202(b) of the FCC's rules requires the FCC make a public interest finding prior to making an ETC designation.⁵² Minnesota law also sets forth public interest goals for all telecommunications providers in the execution of regulatory duties.⁵³ Tempo's designation as a Lifeline-only ETC will bring increased competitive choice and unique advantages to qualifying Minnesota consumers, on the part of a carrier with a demonstrated commitment to quality. The goals of universal service mandated by Congress and by Minnesota law are therefore served by designation of Tempo as a Lifeline-only ETC.⁵⁴

Tempo's ETC designation will bring another competitive alternative to low-income consumers in Minnesota, and will exert further competitive pressures on existing wireless Lifeline providers operating in Minnesota. This furthers the federal Act's goal of ensuring that quality communication services are available at "just, reasonable, and affordable rates."⁵⁵ As the FCC has observed, "an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."⁵⁶

As explained above, Tempo seeks to offer a comprehensive wireless communications

⁵² 47 C.F.R. § 54.202(b).

⁵³ Minn. Stat. § 237.011.

⁵⁴ 47 U.S.C. § 254; Minn. Stat. § 237.011.

⁵⁵ 47 U.S.C. § 254(b)(1).

⁵⁶ *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

solution to the qualifying consumer at no charge. Tempo's ETC designation provides accessible, technologically advanced services to a portion of the public that may not otherwise be able to obtain telecommunications services. Prepaid wireless services like those offered by Tempo also offer consumers convenience, control over their telecommunications spending without the imposition of high monthly fees, and the ability to pay for only those services needed. Such advantages directly fulfill the goals of universal service promulgated by the Minnesota legislature, Congress and the FCC.⁵⁷

CONCLUSION

WHEREFORE, for the forgoing reasons, Tempo respectfully requests that the Commission expeditiously designate it as an ETC for the provision of prepaid wireless Lifeline services in the state of Minnesota.

Respectfully submitted,

TEMPO TELECOM, LLC



Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8930 (telephone)
866-814-6582 (facsimile)
acollins@cahill.com

Dated: December 12, 2013

Its Attorneys

⁵⁷ 47 U.S.C. § 254.

VERIFICATION

I, Jamie Sark, Senior Projects Manager for Tempo Telecom, LLC, have reviewed and am familiar with the foregoing document. The statements in the foregoing document are true of my own knowledge, except as to matters which are herein stated on information and belief, and as to those matters, I believe them to be true.

TEMPO TELECOM, LLC

11/19/13
Date


Name: Jamie Sark
Title: Senior Projects Manager for Tempo
Telecom, LLC

EXHIBITS

- Exhibit 1 December 2012 FCC Filing**
- Exhibit 2 FCC Public Notice**
- Exhibit 3 FCC-Approved Compliance Plan**
- Exhibit 4 September 2013 FCC Letter**
- Exhibit 5 Officer Biographies**
- Exhibit 6 Tempo Designated Service Area in Minnesota**
- Exhibit 7 Marketing Materials**
- Exhibit 8 Enrollment and Certification Form**

EXHIBIT 1

CAHILL GORDON & REINDEL LLP

SUITE 950

1990 K STREET, N.W.

WASHINGTON, D.C. 20006-1181

EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702
(212) 701-3000
FAX: (212) 269-5420

TELEPHONE (202) 862-8900
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AUGUSTINE HOUSE
6A AUSTIN FRIARS
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ANGELA F. COLLINS | 202-862-8930 | acollins@cgrdc.com

December 18, 2012

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket Nos. 09-197, 11-42

Dear Secretary Dortch:

Birch Communications, Inc. (“Birch”) and Now Communications, LLC (“Now Comm”), by their attorneys, respectfully notify the Federal Communications Commission (“Commission”) that Now Comm will comply with and adopt as its own the Compliance Plan filed by Birch and approved by the Commission on August 8, 2012.¹

Now Comm is a Georgia limited liability company, which is in the process of registering with the Commission for domestic interstate authority and obtaining authorization from the Commission for the provision of international telecommunications services. Now Comm is also in the process of obtaining telecommunications authority at the state level in Alabama, Arkansas, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Mississippi, Missouri, North Carolina, Oklahoma, Ohio, South Carolina, Tennessee, Texas, and Wisconsin. In addition to prepaid wireless Lifeline service, Now Comm will also provide the wireline Lifeline services currently provided by Birch and its affiliates as a non-ETC reseller in the 18 above-listed states.²

Sprint will provide Now Comm with the network infrastructure and wireless transmission facilities needed for Now Comm to offer service as a Mobile Virtual Network Operator (“MVNO”). Specifically, Birch’s current contract with Sprint will be assigned to Now Comm.³ In addition, Now Comm will rely on Birch for all other facilities, network, back office, billing, and customer support functions necessary to provide both its Lifeline and non-Lifeline services.

¹ WC Docket Nos. 09-197 and 11-42, *Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless, and TAG Mobile*, Public Notice, DA 12-1286 (rel. Aug. 8, 2012); *see also* Lifeline Compliance Plans & ETC Petitions, <http://www.fcc.gov/encyclopedia/lifeline-compliance-plans-etc-petitions>.

² Petition at 2 (explaining Birch’s provision of Lifeline services as a non-ETC reseller in 18 states). Birch and Now Comm will obtain any necessary regulatory approvals to execute the transfer of existing Birch customers from Birch to Now Comm.

³ Petition at 2 (explaining Birch’s relationship with Sprint).

Birch noted in the Compliance Plan that it was reviewing whether a separate legal entity should be established for the provision of prepaid wireless Lifeline service or whether the service should be provided through one of the existing Birch entities.⁴ In that regard, Birch hereby notifies the Commission that the prepaid wireless Lifeline service will be provided by a separate legal entity known as Now Communications, LLC.

Now Comm will implement and comply with the Birch Compliance Plan approved by the Commission on August 8, 2012,⁵ and hereby adopts the Birch Compliance Plan as its own. Now Comm will utilize the same procedures and operations set forth in the Birch Compliance Plan for its provision of prepaid wireless Lifeline service, and will use the same draft application and verification forms attached to the Birch Compliance Plan. Now Comm will offer the same prepaid wireless Lifeline service plan set forth in the Birch Compliance Plan, and will market and advertise its prepaid wireless Lifeline service in the same manner as described in the Birch Compliance Plan. A copy of the Birch Compliance Plan adopted by Now Comm is attached. Birch and Now Comm have also filed amendments to the pending designation petitions previously filed by Birch to reflect Now Comm's adoption of the Birch Compliance Plan and to request that Now Comm, not Birch, be the entity designated as an eligible telecommunications carrier.⁶

Now Comm will utilize the same management and day-to-day operational personnel as currently utilized by Birch. Birch's current corporate officers will also be corporate officers of Now Comm. Now Comm will be owned by the same ultimate owners of Birch, but will not be part of the Birch corporate family.⁷

⁴ Compliance Plan at n.3.

⁵ WC Docket Nos. 09-197 and 11-42, *Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless, and TAG Mobile*, Public Notice, DA 12-1286 (rel. Aug. 8, 2012); *see also* Lifeline Compliance Plans & ETC Petitions, <http://www.fcc.gov/encyclopedia/lifeline-compliance-plans-etc-petitions>.

⁶ On April 27, 2012, Birch filed a petition for designation as an eligible telecommunications carrier ("ETC") for Lifeline service only for the states of Alabama, Florida, North Carolina, and Tennessee. On November 29, 2012, Birch filed a petition for designation as an ETC for Lifeline service only for the state of Texas. On December 18, 2012, Birch and Now Comm filed amendments to these pending petitions to reflect Now Comm's adoption of the Birch Compliance Plan and the parties' request that ETC status be granted to Now Comm rather than Birch. Birch will not provide Lifeline services as an ETC in any state.

⁷ Specifically, Birch Capital, LLC (a Georgia limited liability company) holds a 100% ownership interest in Now Comm. The current owners of Birch (Holcombe Green and R. Kirby Godsey, which in combination hold a 98% interest in Birch) own approximately 90% of Birch Capital, LLC, with the remaining percentage owned by Vincent Oddo, the Chief Executive Officer of both Birch and Now Comm. *See* Birch Compliance Plan at 4-5 (discussing ownership of Birch).

Please contact the undersigned if you have any questions regarding this matter

Respectfully submitted,

A handwritten signature in cursive script that reads "Angela Collins".

Angela F. Collins
Counsel to Birch Communications, Inc. and
Now Communications, LLC

Attachment

cc: Garnet Hanly (via electronic mail)

EXHIBIT 2



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>
TTY: 1-888-835-5322

DA 12-2068

Release Date: December 20, 2012

**WIRELINE COMPETITION BUREAU SEEKS COMMENT ON PETITIONS FOR
DESIGNATION AS A LOW-INCOME ELIGIBLE TELECOMMUNICATIONS CARRIER
FILED BY NOW COMM, ZING PCS, LTS, ODIN WIRELESS AND TX MOBILE**

WC Docket No. 09-197

Comment Date: January 22, 2013

Reply Comment Date: February 5, 2013

The Wireline Competition Bureau seeks comment on petitions filed by Birch Communications, Inc. (Birch) and Now Communications, LLC (collectively, Now Comm),¹ FLATEL Wireless, Inc. dba ZING PCS (ZING PCS),² LTS of Rocky Mount, LLC (LTS),³ Prepaid Wireless Retail, LLC dba Odin

¹ Birch Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act for Lifeline Support Only in the State of Texas, WC Docket No. 09-197 (filed Nov. 29, 2012); Amendment to Birch Communications, Inc. Petition for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act for Lifeline Support Only in the State of Texas, WC Docket No. 09-197 (filed Dec. 18, 2012) (collectively, Now Comm Amended Petition) (amending the petition to reflect that Birch's prepaid wireless Lifeline service will be provided by a separate legal entity known as Now Communications, LLC and subject to Birch's compliance plan). *See also* Letter from Angela F. Collins, Counsel to Birch and Now Comm, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 09-197, 11-42 (filed Dec. 18, 2012) (Now Comm explains that it will adopt and adhere by Birch's approved Compliance Plan and its business structure). Now Comm will have the same owners as Birch, including the same management and day-to-day operational personnel as currently utilized by Birch. *See* Now Comm Amended Petition at 2-3.

The Wireline Competition Bureau has approved Birch's compliance plan, which will also apply to Now Comm. *See Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless and TAG Mobile*, WC Docket Nos. 09-197 and 11-42, 27 FCC Rcd 9184 (Wireline Comp. Bur. 2012); *see also Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6816, para. 380 (2012) (*Lifeline Reform Order*).

² FLATEL Wireless, Inc. dba ZING PCS Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, Texas and Virginia, WC Docket No. 09-197 (filed Dec. 14, 2012) (ZING PCS Petition). ZING PCS has a compliance plan pending with the Commission and may not be designated as an ETC until its plan has been approved by the Wireline Competition Bureau. *See* FLATEL Wireless, Inc. dba ZING PCS Amended Compliance Plan, WC Docket Nos. 09-197 and 11-42 (filed Nov. 14, 2012); *see also, Lifeline Reform Order*, 27 FCC Rcd at 6816, para. 380.

³ LTS of Rocky Mount, LLC Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia, WC Docket No. 09-197 (filed Oct. 31, 2012) (LTS Petition). LTS has a compliance plan pending with the Commission and may not be designated an ETC until its plan has been approved by the Wireline Competition Bureau. *See* LTS of Rocky Mount, LLC Compliance Plan, WC Docket Nos. 09-197 and 11-42 (filed Oct. 31, 2012); *see also, Lifeline Reform Order*, 27 FCC Rcd at 6816, para. 380.

Wireless (Odin Wireless),⁴ and TX Mobile, LLC (TX Mobile),⁵ for limited designation as an eligible telecommunications carrier (ETC) for the provision of Lifeline service. LTS and TX Mobile each seek designation as an ETC for the limited purpose of offering Lifeline service in Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, North Carolina, New York, Tennessee and Virginia.⁶ ZING PCS and Odin Wireless each seek designation as an ETC for the limited purpose of offering Lifeline service in Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, North Carolina, New York, Tennessee, Texas and Virginia. Now Comm seeks ETC designation for the limited purpose of offering Lifeline service in Texas.⁷

Pursuant to sections 1.415 and 1.419 of the Commission's rules, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).⁸

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <http://fjallfoss.fcc.gov/ecfs2/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. If more than one docket or rulemaking number appears in the caption of this proceeding, filers must submit two additional copies for each additional docket or rulemaking number.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

⁴ Prepaid Wireless Retail, LLC dba Odin Wireless Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, Texas and Virginia, WC Docket No. 09-197 (filed Dec. 10, 2012) (Odin Wireless Petition). Odin Wireless has a compliance plan pending with the Commission and may not be designated an ETC until its plan has been approved by the Wireline Competition Bureau. See Prepaid Wireless Retail, LLC dba Odin Wireless Compliance Plan, WC Docket Nos. 09-197 and 11-42 (filed Dec. 10, 2012); see also, *Lifeline Reform Order*, 27 FCC Rcd, at 6816, para. 380.

⁵ TX Mobile, LLC Petition for Limited Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia, WC Docket No. 09-197 (filed Nov. 26, 2012) (TX Mobile Petition). TX Mobile has a compliance plan pending with the Commission and may not be designated an ETC until its plan has been approved by the Wireline Competition Bureau. See TX Mobile, LLC, Compliance Plan, WC Docket Nos. 09-197 and 11-42 (filed Oct. 18, 2012); see also, *Lifeline Reform Order*, 27 FCC Rcd at 6816, para. 380.

⁶ ZING PCS Petition at 1-2; LTS Petition at 1; Odin Wireless Petition at 1; TX Mobile Petition at 1.

⁷ Now Comm Amended Petition at 1-3.

⁸ See 47 CFR §§ 1.415, 1.419; *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

The proceeding this Notice initiates shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.⁹ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter’s written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

For further information, please contact Divya S. Shenoy, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-7400 or TTY (202) 418-0484.

- FCC -

⁹ 47 C.F.R. §§ 1.1200 *et seq.*

EXHIBIT 3

Tempo Telecom, LLC Compliance Plan

Tempo Telecom, LLC (f/k/a Now Communications, LLC) has adopted the following Further Amended Compliance Plan of Birch Communications, Inc. dated June 29, 2012, which was approved by the Wireline Competition Bureau on August 8, 2012. *See Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless, and TAG Mobile, 27 FCC Rcd 9184 (2012).*

The Wireline Competition Bureau confirmed the adoption of the Compliance Plan by Tempo Telecom, LLC (f/k/a Now Communications, LLC) on December 20, 2012. *See Wireline Competition Bureau Seeks Comment on Petitions for Designation as a Low-Income Eligible Telecommunications Carrier filed by Now Comm, Zing PCS, LTS, Odin Wireless, and TX Mobile, 27 FCC Rcd 15937 (2012)* (“The Wireline Competition Bureau has approved Birch’s compliance plan, which will also apply to Now Comm.”).

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
BIRCH COMMUNICATIONS, INC.)	WC Docket No. 09-197
)	
Compliance Plan)	WC Docket No. 11-42
)	
)	
Petition for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(6) of the Communications Act for Lifeline Support Only)	
)	
)	

FURTHER AMENDED COMPLIANCE PLAN OF BIRCH COMMUNICATIONS, INC.

Birch Communications, Inc. (“Birch”), by its attorneys, respectfully submits this Amended Compliance Plan to be associated with its Petition for designation as an eligible telecommunications carrier (“ETC”) pursuant to Section 214(e)¹ of the Communications Act of 1934, as amended (the “Act”), and Section 54.201² of the rules and regulations of the Federal Communications Commission (“Commission”), which was filed on April 27, 2012 in the above-referenced matters. Birch’s original Compliance Plan was filed May 7, 2012, and an amendment was filed June 1, 2012. Birch seeks ETC designation for Lifeline support only to provide prepaid wireless services under the “NOW Communications” brand name in the non-rural areas of the following states: Alabama, Florida, North Carolina, and Tennessee (the “Designated Service Area”).³

¹ 47 U.S.C. § 214(e).

² 47 C.F.R. § 54.201.

³ Birch is reviewing whether a separate legal entity should be established for the provision of its prepaid wireless Lifeline service or whether the service should be provided through one of the existing Birch entities, such as Birch Telecom of the South, Inc. (FCC Filer ID 820616), which is a subsidiary of Birch and operates as a certificated carrier in Alabama, Florida, North Carolina, and Tennessee. More information on Birch’s corporate structure is set forth herein.

Both the Act and the Commission's rules require a carrier seeking ETC designation to offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services.⁴ In the *Lifeline Reform Order*, however, the Commission decided to conditionally forbear from application of the Act's facilities requirement to all telecommunications carriers that seek limited ETC designation to participate in the Lifeline program.⁵ Specifically, the Commission determined that conditional forbearance from the facilities requirement would apply if the carrier: (1) complied with certain 911 requirements and (2) filed and received approval of a compliance plan providing specific information regarding the carrier's service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Lifeline Reform Order* as well as further safeguards against waste, fraud and abuse as the Wireline Competition Bureau may deem necessary.⁶

To avail itself of the Commission's conditional grant of forbearance from the facilities requirement, Birch provides this Compliance Plan in accordance with the requirements of the *Lifeline Reform Order*⁷ and the *Public Notice* issued by the Wireline Competition Bureau on February 29, 2012.⁸ Specifically, Birch's Compliance Plan provides information regarding Birch's planned Lifeline service offerings and outlines the measures Birch will take to implement the obligations contained in the *Lifeline Reform Order* as well as further safeguards

⁴ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

⁵ *Lifeline Reform Order* ¶ 368.

⁶ *Lifeline Reform Order* ¶ 368.

⁷ WC Docket Nos. 11-42, 03-109, 12-23 and CC Docket No. 96-45, *Lifeline and Link Up Reform and Modernization, et al.*, FCC 12-11, Report and Order and Further Notice of Proposed Rulemaking, ¶ 368 ("*Lifeline Reform Order*").

⁸ WC Docket Nos. 09-197, 11-42, *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, DA 12-314 (rel. Feb. 29, 2012) ("*Public Notice*").

against waste, fraud and abuse. To that end, Birch provides the information requested in the *Public Notice*, which indicated compliance plans should contain the following:

(1) Information about the carrier and the Lifeline plans it intends to offer:

(a) names and identifiers used by the carrier, its holding company, operating company and all affiliates;

Birch is a competitive local exchange carrier (“CLEC”) and interexchange carrier (“IXC”), and since 1996 has been providing high-quality, cost-effective integrated communications services and related information technology services to residential and small and medium-sized business (“SMB”) customers. Today, Birch offers a variety of products, services and tailored solutions including local voice, long distance voice, broadband Internet, converged Internet Protocol (“IP”) solutions, and related telecommunications and IT services.

Birch is a Georgia corporation with offices located at 3060 Peachtree Road NW, Suite 1065, Atlanta, GA 30305 and 2300 Main Street, Suite 340, Kansas City, MO 64108. Birch has authority to provide interstate and international telecommunications services from the Commission.⁹ Birch’s wholly-owned subsidiary, Birch Communications of Virginia, Inc., operates pursuant to Birch’s international 214 authority and is registered to provide interstate telecommunications services.¹⁰ Birch’s wholly-owned subsidiary, Birch Telecom, Inc., has authority to provide international telecommunications services.¹¹ The following wholly-owned subsidiaries of Birch Telecom, Inc. operate pursuant to Birch Telecom Inc.’s international authority and also provide interstate telecommunications services: Birch Telecom of the South, Inc., Birch Telecom of the West, Inc., Birch Telecom of the Great Lakes, Inc., Birch Telecom of Missouri, Inc., Birch Telecom of Oklahoma, Inc., Birch Telecom of Texas Ltd., LLP, Birch

⁹ IB File No. ITC-214-19970926-00584, FCC Filer ID 815113.

¹⁰ FCC Filer ID 828502.

¹¹ IB File No. ITC-214-19990701-00441.

Telecom of Kansas, Inc., Birch Communications of the Northeast, Inc., Ionex Communications, Inc., Ionex Communications South, Inc., and Ionex Communications North, Inc.¹² Each of these subsidiaries also operates under the D/B/A name of “Birch Communications,” and certain of Birch’s subsidiaries also serve customers under the brand name “NOW Communications.”¹³ Customers purchasing Birch’s prepaid wireless Lifeline service offering will see the “NOW Communications” logo.¹⁴

The Birch family of companies either offer service or are certificated to offer telecommunications services as CLECs and intrastate IXC’s in the following 38 states: Alabama, Arkansas, California, Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, New Jersey, New Mexico, New York, North Carolina, North Dakota, Nebraska, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Virginia, Washington, Wisconsin, and Wyoming. The Birch family of companies currently serves approximately 118,000 customers throughout Birch’s 38-state territory.

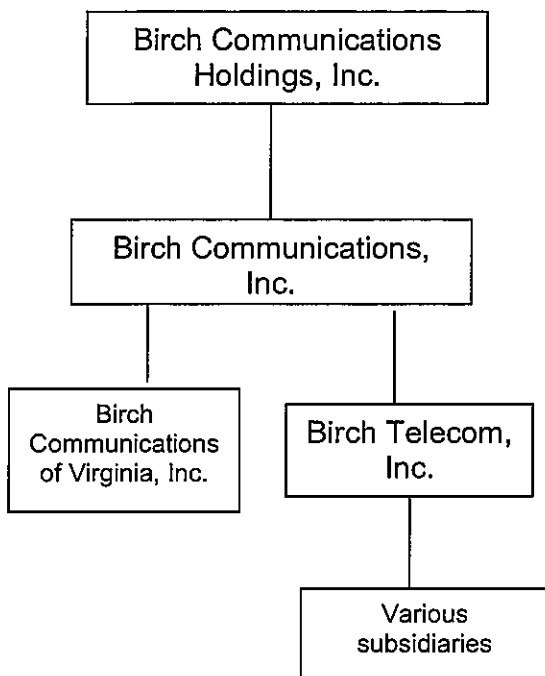
Birch Communications Holdings, Inc. (“Birch Holdings”) owns a 100% voting and equity interest in Birch. Birch Holdings is a Georgia corporation whose principal business is

¹² Birch Telecom of the South, Inc. (FCC Filer ID 820616), Birch Telecom of the West, Inc. (FCC Filer ID 827985), Birch Telecom of the Great Lakes, Inc. (FCC Filer ID 826636), Birch Telecom of Missouri, Inc. (FCC Filer ID 819422), Birch Telecom of Oklahoma, Inc. (FCC Filer ID 820061), Birch Telecom of Texas LTD LLP (FCC Filer ID 819948), Birch Telecom of Kansas, Inc. (FCC Filer ID 807993), IONEX Communications, Inc. (FCC Filer ID 815376), Birch Communications of the Northeast, Inc. (FCC Filer ID 828483), Ionex Communications South, Inc. (FCC Filer ID 808443), Ionex Communications North, Inc. (FCC Filer ID 815082).

¹³ These subsidiaries are Birch Telecom of the South, Inc., Birch Telecom of Missouri, Inc., Birch Telecom of Kansas, Inc., Birch Telecom of Oklahoma, Inc., and Birch Telecom of Texas Ltd., L.L.P. Birch acquired the use of the “NOW Communications” trade name in an earlier asset acquisition.

¹⁴ Birch is reviewing whether a separate legal entity should be established for the provision of its prepaid wireless Lifeline service or whether the service should be provided through one of the existing Birch entities, such as Birch Telecom of the South, Inc. (FCC Filer ID 820616), which is a certificated carrier in Alabama, Florida, North Carolina, and Tennessee.

telecommunications holdings. The address for Birch Holdings is 3060 Peachtree Road, NW, Suite 1065, Atlanta, GA 30305. Below is Birch's organizational chart:



The following entities and individuals hold a ten percent (10%) or greater direct or indirect ownership interest in Birch Holdings: (1) Holcombe Green, a U.S. citizen, owns a 66% voting and equity interest in Birch Holdings and (2) R. Kirby Godsey, a U.S. citizen, owns a 32% voting and equity interest¹⁵ in Birch Holdings. The business address for both Mr. Green and Mr. Godsey is 3060 Peachtree St., NW, Suite 1060, Atlanta, GA 30305. None of the entities or individuals holding an interest in Birch or Birch Holdings hold any interests in other telecommunications-related entities.

¹⁵ R. Kirby Godsey holds his percentage through his individual holdings and through the R. Kirby Godsey 2008 Grantor Retained Annuity Trust.

(b) detailed information demonstrating that the carrier is financially and technically capable of providing the supported Lifeline service in compliance with the Commission's rules;

The Commission has stated that the “relevant considerations” for demonstrating that a carrier is financially and technically capable would be whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.¹⁶ Birch has been operating as a CLEC/IXC since 1996, and currently operates in 38 states. In addition to the other services it offers, Birch has been providing wireline Lifeline services in 18 states as a non-ETC reseller using resold services obtained from AT&T for numerous years. Birch serves approximately 1800 wireline Lifeline customers at this time as a non-ETC reseller. Birch does not, and will not, rely on universal service fund disbursements to operate - the majority of Birch's funds to operate will come from the non-Lifeline services it provides throughout its 38-state territory. Birch has not been subject to an abnormal number of enforcement proceedings given the significant number of customers it serves and the more than 15 years it has been offering service.

With respect to the prepaid wireless Lifeline service, Birch will resell the wireless services of Sprint, which provides wholesale capacity to wireless resellers. Like several other prepaid wireless providers, Sprint will provide Birch with the network infrastructure and wireless transmission facilities needed for Birch to offer service as a Mobile Virtual Network Operator (“MVNO”). Sprint is a large, nationwide carrier, and serves several other MVNOs offering

¹⁶ *Lifeline Reform Order* ¶ 388.

wireless Lifeline products.¹⁷ Birch's partnership with Sprint further demonstrates that Birch is technically capable of providing a prepaid wireless Lifeline service.

(c) detailed information, including geographic locations, of the carrier's current service offerings if the carrier currently offers service;

Please see Birch's response to 1(a) above. Birch currently provides local, toll, domestic long distance, and international long distance as a CLEC/IXC in the 38 states listed above. Birch also provides broadband Internet, converged IP solutions, and related telecommunications and IT services throughout its 38-state service territory.

(d) the terms and conditions of each Lifeline service plan offering, including rates, the number of minutes provided, and additional charges, if any, for toll calls; and

At this time, Birch plans to offer the following prepaid wireless Lifeline plan at no charge to an eligible customer:

Basic Plan Prepaid Wireless Lifeline Plan

Wireless handset (there are several handset options) - at least one free choice and the possibility of additional choices¹⁸

250 nationwide minutes per month

Voicemail

National texting, with each text sent or received counting as 1 minute

911 and E911 access as available

Option to purchase additional minutes anytime during the month that carry over for 2 months

Option for international calling with per-minute pricing based on the country to be called, which will be provided to the consumer when opting for this capability

¹⁷ Based on filings made with the Commission, it appears Sprint also provides underlying MVNO services to other carriers such as PlatinumTel, i-wireless, and CAL Communications, which also have sought ETC designation from the Commission.

¹⁸ Birch is still considering which handsets will be offered, but all handsets will be compliant with all applicable Commission requirements. Handsets will be offered for free in conjunction with the prepaid wireless Lifeline product. Based upon market availability and handset prices, the consumer may have a choice of handsets. Birch is continuing to evaluate the possibility of offering premium handsets at an additional cost, but a free handset will always be offered to every prepaid wireless Lifeline subscriber.

Additional minutes

Minutes	Price
200	13.95
250	16.95
300	19.95
400	25.95
900	49.95

Available minutes are nationwide, and there are no additional charges for toll calling.

(e) all other certifications required under newly amended section 54.202 of the Commission's rules.

Section 54.202 of the Commission's rules requires a common carrier seeking ETC designation to: (1) certify that it will comply with the service requirements applicable to the support that it receives;¹⁹ (2) submit a five-year plan for proposed improvements or upgrades to the applicant's network unless the applicant is seeking Lifeline support only;²⁰ (3) demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations;²¹ (4) demonstrate that it will satisfy applicable consumer protection and service quality standards;²² (5) demonstrate it is financially and technically capable of providing Lifeline service in compliance with the Commission's rules;²³ and (6) submit information describing the terms and conditions of the voice telephony plans offered to

¹⁹ 47 C.F.R. § 54.202(a)(1)(i).

²⁰ 47 C.F.R. § 54.202(a)(1)(ii).

²¹ 47 C.F.R. § 54.202(a)(2).

²² 47 C.F.R. § 54.202(a)(3).

²³ 47 C.F.R. § 54.202(a)(4).

Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges for toll calls (if any), and rates for each such plan.²⁴

Birch has addressed (5) and (6) above in (1)(b) and (1)(d), and the five-year plan required under (2) is no longer applicable given that Birch seeks designation for Lifeline support only.²⁵

With respect to (1), Birch seeks ETC designation for Lifeline support only, and therefore certifies that it will comply with the service requirements applicable to Lifeline support.

With respect to (3), Birch has the ability to remain functional in emergency situations. Birch has been offering telecommunications services since 1996, and thus has significant experience with remaining functional in emergency situations. As a CLEC/IXC, Birch is currently subject to the Commission's outage reporting rules, as well as the back-up power and outage requirements in the states in which Birch operates. As a successful, profitable CLEC for over 15 years Birch has disaster recovery contingency plans that include diverse/alternate routing, electronics redundancy, dual data centers geographically separated, and environmental controls for data and switching centers. Birch will apply these same measures to its prepaid wireless Lifeline service offering to the extent there is an emergency situation affecting Birch's operations. Birch's MVNO contract arrangement with Sprint also imposes certain obligations on Sprint to ensure Birch's prepaid wireless Lifeline service offering remains functional during emergency situations.²⁶ As a large, nationwide wireless carrier, Sprint is subject to regulatory

²⁴ 47 C.F.R. § 54.202(a)(5).

²⁵ *Lifeline Reform Order* ¶ 386.

²⁶ While Sprint will provide the underlying wireless services to Birch, Birch will provide billing services associated with the prepaid wireless Lifeline product to the Birch end user customer. The Birch billing system will be served by two geographically separate data centers for back-up redundancy, one currently located in Macon, Georgia and the other in Emporia, Kansas.

requirements to remain functional during emergency situations.²⁷ Birch's MVNO agreement with Sprint also contains certain quality of service guarantees.

With respect to (4), Birch will satisfy applicable consumer protection and service quality standards. As a CLEC/IXC, Birch is currently subject to the consumer protection and service quality standards promulgated by the Commission and the states in which Birch operates. Birch will apply these same practices to its prepaid wireless Lifeline service product, and will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service to satisfy this requirement as permitted by the Commission's rules.²⁸

(2) A detailed explanation of how the carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline services, including all of the consumer eligibility, consumer enrollment, and re-certification procedures, as required by Section VI and Appendix C of the *Lifeline Reform Order*, and a copy of the carrier's certification form.

Birch currently offers wireline Lifeline services as a non-ETC reseller. Birch is therefore intimately familiar with the Commission's procedures for confirming consumer eligibility, enrolling eligible customers, re-certifying eligibility at regular intervals, and recordkeeping. Birch plans to build on that expertise in offering its prepaid wireless Lifeline service offering as an ETC. Birch has implemented the Commission's *Lifeline Reform Order* rule changes into its existing wireline, non-ETC Lifeline program.²⁹ Birch will utilize the same processes outlined below for both its prepaid wireless Lifeline service (as an ETC) and its wireline Lifeline service (as a non-ETC reseller) to the extent applicable.

²⁷ Birch is also familiar with the continuity and disaster response program Sprint has implemented, which addresses the need to remain functional during emergency situations.

²⁸ 47 C.F.R. § 54.202(a)(3).

²⁹ Birch recently received and executed a certification form from AT&T, its underlying provider for its resold Lifeline services, in which Birch certified its compliance with the FCC's *Lifeline Reform Order* requirements for Birch's provision of wireline Lifeline services as a non-ETC reseller.

Set forth as Attachment A is an initial draft of Birch's prepaid wireless Lifeline enrollment and certification forms. Birch is continuing to refine these documents and will make any necessary changes to the extent the Commission or the Universal Service Administrative Company ("USAC") issue additional guidance on the language to be contained on enrollment and certification forms. Birch also confirms that it will comply with any future Commission or USAC guidance, directives, or rule changes regarding the Lifeline program.

Consumer Eligibility

Under its current procedures for its wireline Lifeline offering (as a non-ETC reseller), Birch utilizes the Texas Low Income Database Administrator database to verify and document a Texas consumer's eligibility for Lifeline service. Until a national database is available, Birch will utilize available state-level databases to verify eligibility for its prepaid wireless Lifeline service offering as required under the Commission's rules. Where state-level database technology is not available, Birch will require potential customers to provide their proof of eligibility documentation directly to Birch (either via facsimile, U.S. mail, electronic mail, or through a Birch-authorized third-party dealer as discussed below). New subscribers can be added to the Lifeline program through Birch internal sales agents or through Birch-authorized third-party dealers. Birch currently utilizes approximately 100 third-party dealers for its wireline Lifeline product (non-ETC reseller), and plans to offer its wireless Lifeline product at those same locations plus additional locations that would be frequented by the target audience for Lifeline services. Birch's current third-party dealers include check cashing locations, grocery stores, computer stores, independent telephone retailers, storage facilities, beauty supply stores, and pawn shops. Once wireless Lifeline service is implemented, Birch plans to add independent wireless retailers and mall kiosks to its potential third-party dealer locations.

In the internal sales agent situation, the potential subscriber would provide its eligibility documentation to Birch and would complete the enrollment and certification form in paper format, via third-party verification (or “TPV”), or via electronic signature as described in the “Enrollment and Certification” section below. As described in more detail below, the handset would then be shipped to the customer after Birch verifies the customer’s eligibility to obtain a Lifeline product and has obtained all necessary certifications from the customer. The flow-chart in Attachment B-1 provides more detail on the process using internal sales agents.

At the third-party retail location, a potential subscriber can provide its eligibility information in-person to the third-party dealer, which will then be transmitted to Birch for review as explained below. The potential subscriber can also complete the enrollment and certification form discussed further below and a draft of which is set forth in Attachment A. As described in more detail below, the handset would then be shipped to the customer after Birch verifies the customer’s eligibility to obtain a Lifeline product and has obtained all necessary certifications from the customer. The flow-chart in Attachment B-2 provides more detail on the process using third-party retail locations. To ensure compliance with the Commission’s one-per-household and other Lifeline eligibility requirements, Birch will require its third-party dealers to have their employees participate in quarterly webinars to receive training (and re-training) on Commission-compliance requirements for Lifeline services. Birch will also supply each third-party dealer with copies of written materials providing detailed information on the Commission’s Lifeline compliance requirements. Birch will then require the third-party dealer to sign documentation certifying that all employees selling Birch Lifeline services have read the Lifeline compliance requirements provided by Birch, understand the Lifeline compliance requirements,

and will comply with the Lifeline compliance requirements. Birch will conduct periodic audits and random checks of its third-party dealers to ensure compliance with the Commission's rules.

It is important to note that, even when a customer signs up for Lifeline service through a third-party dealer, eligibility information provided by potential consumers will be reviewed by appropriate Birch personnel pursuant to Birch's internal policies for review of Lifeline eligibility documents. Until such time as there is adequate database access allowing third-party dealers to confirm eligibility automatically through Commission-sanctioned databases, all initial eligibility determinations will be made by Birch personnel. And even after third-party dealers have access to eligibility databases, Birch will review and verify a consumer's eligibility prior to seeking reimbursement for that customer. As part of confirming a potential customer's eligibility, Birch personnel will also confirm that there is no Lifeline duplication using the process discussed under (5) below. Detailed information regarding the documents provided by the potential customer and Birch's review of the documentation will be included in the customer's account information as kept in Birch's internal recordkeeping system. Any actual documentation provided by the potential customer will be destroyed or returned to the customer upon request.³⁰

Enrollment and Certification

Once Birch determines a potential customer is eligible to receive a Lifeline service product, Birch will proceed to enroll the customer in its prepaid wireless Lifeline program and obtain the necessary certifications under the Commission's rules (this can be done by an internal Birch sales agent or a Birch-authorized third-party dealer as explained above). In its current wireline Lifeline service offering (as a non-ETC reseller), Birch utilizes TPV to enroll customers and confirm their certification for Lifeline eligibility in addition to paper enrollment/certification

³⁰ *Lifeline Reform Order* ¶ 101.

forms. Birch plans to continue utilizing TPV for its prepaid wireless Lifeline service product³¹ to the extent Birch can ensure all Commission-required information is included in the TPV without the process becoming too unwieldy for the potential customer. Birch also plans to make paper forms available for enrollment/certification and also is looking to develop an online portal that potential customers could access via any Internet connection, including at their local libraries or social service organizations for electronic signature of the required documentation.

As part of the enrollment/certification process, Birch will first obtain the relevant contact information from the potential customer: (a) full name; (b) full residential address; (c) whether the residential address is permanent or temporary; (d) billing address if different than residential; (e) date of birth, (f) last 4 digits of Social Security Number; (g) if qualifying under federal or state assistance program, which program; and (h) if qualifying under income-based criteria, the number of individuals in the household. Birch will also require the customer to indicate whether the household is shared, which would trigger the use of the Lifeline Household Worksheet developed by USAC (included as part of Birch's draft enrollment and certification form set forth in Attachment A). Birch will also confirm that the customer understands its information may be shared with USAC as necessary under the Commission's rules and to ensure there is no duplication of Lifeline benefits.

Next, Birch will utilize its TPV script or the paper form (or online portal once developed) to address each of the certifications required under the Commission's rules. The certifications will be addressed through individual questions, each to be answered by the customer before

³¹ The Commission has recognized TPV is an acceptable method for obtaining such information. *See Lifeline Reform Order* ¶ 169.

moving any further in the TPV script³² or each to be initialed by the customer on the paper form (or each to be individually acknowledged in an online format):

- Certifying, under penalty of perjury, that the consumer meets the Lifeline eligibility requirements because either the household receives benefits from a qualifying state or federal assistance program (and naming the program) or has income at or below 135% of the Federal Poverty Guidelines;
- Certifying, under penalty of perjury, that the consumer has presented documentation to Birch that accurately represents the consumer's household income or participation in the program;
- Certifying, under penalty of perjury, that the consumer will notify Birch within 30 days when it is no longer eligible for Lifeline service, whether because the consumer no longer qualifies, it has another Lifeline supported service, or for any other reason, and confirming that the customer understands failure to so notify Birch may subject it to penalties;
- Certifying, under the penalty of perjury, that the information the consumer is providing to Birch is true and correct to the best of its knowledge;
- Certifying, under the penalty of perjury, that the consumer understands that providing false or fraudulent information to receive Lifeline benefits is punishable by law;
- Certifying, under penalty of perjury, that the consumer understands it will be required to annually re-certify its continued eligibility for Lifeline at any time and that failure to do so will result in the termination of the consumer's Lifeline benefits;

³² The customer will be required to answer "Yes" to these questions on the recorded TPV to enroll in Birch's prepaid wireless Lifeline program. TPV recordings are searchable by confirmation number and primary telephone number assigned to the customer. TPV confirmation numbers will be stored in the order and account notes associated with the customer.

- Certifying, under penalty of perjury, that the consumer will provide its new address to Birch within 30 days of moving;
- Certifying, under penalty of perjury, that the consumer will be required to verify its temporary address every 90 days if the subscriber provides a temporary residential address when initially enrolling;
- Certifying, under penalty of perjury that the subscriber's household is receiving no more than one Lifeline-supported service, that the consumer receives Lifeline-supported service only from Birch, and to the best of the consumer's knowledge no one else in the subscriber's household is receiving a Lifeline-supported service;
- Certifying that the consumer understands that Lifeline is a government benefit and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program;
- Certifying that the consumer understands that Lifeline is a non-transferrable benefit, and that an eligible Lifeline subscriber may not transfer its phone service to anyone else, not even someone who is also eligible;
- Certifying that the consumer understands that non-usage of its prepaid wireless Lifeline service from Birch for any consecutive 60-day period of time will result in de-enrollment and deactivation of the service; and
- Certifying that the consumer understands that (a) Lifeline is a federal benefit; (b) Lifeline service is available for only one line per household; (c) a household is defined for purposes of the Lifeline program as any individual or group of individuals who live together at the same address and share income and expenses; (d) a household is not permitted to receive Lifeline benefits from multiple providers; and (e) violation of the

one-per-household rule constitutes a violation of Commission rules and will result in the consumer's de-enrollment from the program and could result in criminal prosecution by the United States government.

Birch will ensure its TPV script and paper documentation is written in clear, easily understood language. Birch will retain its TPV recordings and copies of its paper enrollment/certification documentation for at least five (5) years.

Once all eligibility determinations and documentation requirements are complete, Birch will ship the handset to the customer via overnight delivery to the address listed on the enrollment form. Birch will require the customer to take affirmative steps to "personally activate" the service, either by requiring the customer to use the handset to activate the Lifeline service or to complete an outgoing call.³³ If service is not initiated, Birch will not consider the consumer to be enrolled in the Lifeline program and Birch will not request Lifeline reimbursement until the subscriber personally activates its service.³⁴ The flow-charts in Attachments B-1 and B-2 provide more detail on the certification process using both internal sales agents and third-party dealers.

Annual Re-Certification

Birch's systems are capable of tracking and flagging the anniversary of a Lifeline customer's start date. Birch plans to utilize this anniversary date to ensure its Lifeline customers re-certify their eligibility to participate in the Lifeline program once a year. Birch will utilize state-level databases or the national database to the extent available to re-certify customers. Until that time, Birch plans to contact its prepaid wireless Lifeline customers via written notification, and is exploring the ability to utilize text messaging, automated voicemail, and TPV

³³ *Lifeline Reform Order* ¶ 260.

³⁴ *Lifeline Reform Order* ¶ 257.

re-certification procedures. Any customers that do not re-certify within the 30-day window will be de-enrolled from Birch's prepaid wireless Lifeline service within five (5) business days after the expiration of the subscriber's time to respond to Birch's re-certification efforts as required by Commission's rules, which is explained in more detail below.³⁵ Birch will retain any TPV recordings, paper forms, copies of text message, or other documentation for re-certification for at least five (5) years. The flow-chart in Attachment B-3 provides more detail on the annual re-certification process.

(3) A detailed explanation of how the carrier will comply with the forbearance conditions relating to public safety and 911/E-911 access.

Birch's prepaid wireless Lifeline service offering will comply with the 911 requirements outlined in the *Lifeline Reform Order* necessary for application of conditional forbearance. Birch will provide its prepaid wireless Lifeline subscribers with 911 and E911 access regardless of activation status and availability of minutes. Birch will also provide its Lifeline subscribers with E911-compliant handsets and replace, at no additional charge to the subscriber, any non-compliant handset. Birch will rely on its contractual arrangement with Sprint to provide 911 and E911 services to consumers, as well as obtain the handsets to be provided to consumers.³⁶ Birch's MVNO arrangement with Sprint specifically addresses 911/E911 services and requires Sprint to supply handsets that satisfy all Commission requirements.

³⁵ 47 C.F.R. § 54.405(e)(4).

³⁶ Birch understands that it has an independent obligation to provide 911 and E911 services as a wireless reseller, and will utilize its underlying contractual arrangement with Sprint to meet that obligation. *See, e.g.*, 47 C.F.R. § 20.18(m); *Lifeline Reform Order* at n.989.

(4) A detailed explanation of how the carrier will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program;

Birch will publicize the availability of its prepaid wireless Lifeline service offering in a manner reasonably designed to reach those likely to qualify for the service.³⁷ Birch will utilize the Commission's 2004 outreach guidelines for advertising its prepaid wireless Lifeline service offering.³⁸ Specifically, Birch will utilize outreach materials and methods designed to reach households that currently do not have telephone service, will develop advertising materials for non-English speaking populations within its service area, and will coordinate its outreach efforts with relevant government agencies. As required under the *Lifeline Reform Order*, Birch will ensure the Commission-required disclosures, any DBA names it uses, and details of the prepaid wireless Lifeline service offering are contained in all marketing materials.³⁹

Birch's advertising strategy for its prepaid wireless Lifeline service offering will build on its expertise in advertising its wireline Lifeline product currently offered as a non-ETC reseller. Birch understands that its ability to provide wireline Lifeline services as a non-ETC reseller may be limited in the future. As part of its marketing efforts for its prepaid wireless Lifeline service, Birch will market to those consumers currently taking its wireline Lifeline product, but will ensure that the consumer receives only one Lifeline service in accordance with the Commission's one-per-household rules.

Birch's advertising for its prepaid wireless Lifeline service offering will include, but not be limited to, targeted direct mail, advertisements in daily and weekly print periodicals, billboards, event sponsorship, bus advertising, radio advertising, and online search engines. Birch will also engage in outbound calling campaigns (consistent with applicable telemarketing

³⁷ 47 C.F.R. § 54.405(b).

³⁸ *Lifeline and Link Up*, 19 FCC Rcd 8302, ¶¶ 45-48 (2004).

³⁹ *Lifeline Reform Order* ¶¶ 274-282.

regulations). Birch will obtain marketing calling lists through various marketing activities, which may include, but not be limited to interest forms completed by prospective customers who have attended a marketing event and have provided their phone number indicating their interest in being contacted. Birch also plans to target its current wireline Lifeline customers (served by Birch as a non-ETC reseller) to determine interest in converting from wireline Lifeline service to wireless Lifeline service. Birch will also consider purchasing prospective customer lists for outbound calling campaigns once the company has determined such lists effectively target potential Lifeline customers and adhere to all applicable telemarketing regulations. Once Birch has a list of prospective customer to contact, Birch marketing personnel will deliver a marketing message that accurately and in detail describes the benefits of the Lifeline program, how the Lifeline program works, and eligibility requirements to qualify as a Lifeline customer, including a determination of whether the prospective customer is already receiving a Lifeline service (duplicative service check). If the prospective customer appears initially qualify, the outbound marketing call will initiate the completion of the Birch Lifeline Enrollment Form and receipt program eligibility documents to be reviewed by Birch personnel.

Birch will also coordinate with relevant state agencies, community outreach organizations, and non-profit organizations to make information available regarding Birch's prepaid wireless Lifeline service offering in resource guides and other printed materials produced by those organizations, as well as in their offices or other locations visited by potential Lifeline-eligible subscribers. Birch has existing relationships with these organizations in connection with its current wireline Lifeline service offering. Birch will pro-actively market its prepaid wireless Lifeline services through state, county, municipal and non-profit community action agencies, associations and networks. These agencies support Lifeline eligible individuals and families in

obtaining support services, employment, employment training, life skills training and other services. Birch will have marketing personnel dedicated to building strong relationships with these agencies - and formulate marketing programs that support the missions of these agencies. Birch will raise awareness of Birch Lifeline services through the inclusion of Birch Lifeline information in resource guides and other support materials (online and in printed materials issued by the agency) that are provided to Lifeline-eligible prospective customers. Birch will also pursue referral arrangements and partnerships where a non-profit non-governmental agency can specifically refer Lifeline-eligible customers directly to Birch in exchange for minimal compensation or other remuneration to the agency for the referral. Birch will also raise awareness of its Lifeline services through sponsoring events held by these agencies.

(5) A detailed explanation of the carrier's procedures and efforts to prevent waste, fraud and abuse in connection with Lifeline funds, including but not limited to, procedures the carrier has in place to prevent duplicate Lifeline subsidies within its own subscriber base, procedures the carrier undertakes to de-enroll subscribers receiving more than one Lifeline subsidy per household, information regarding the carrier's toll limitation service, if applicable, and the carrier's non-usage policy, if applicable.

Prior to enrolling a Lifeline customer, Birch will take two steps to prevent duplicate Lifeline subsidies within its own subscriber base. First, Birch will review its own service records to ensure the potential customer is not currently receiving a Lifeline service from Birch. Second, Birch will utilize available state-level databases and the national database to be created to ensure the potential customer is not currently receiving a Lifeline service from any other carrier. Birch will promptly investigate any notification it receives from a state, the Commission, or USAC that one of its Lifeline customers is improperly receiving service. Birch will also update any required databases within one (1) business day of de-enrolling a consumer.⁴⁰ The flow-chart set forth in Attachment B-4 provides additional detail on the de-enrollment process described herein.

⁴⁰ *Lifeline Reform Order* ¶ 257.

De-enrollment for failure to re-certify. Birch will also re-check its internal databases and available state-level or federal databases as part of its annual re-certification process. Birch will issue a letter separate from the invoice to all subscribers, requesting them to recertify and noticing the subscriber that failure to respond within 30 days will trigger de-enrollment. The subscriber will be given the option to mail or fax back the re-certification form. The subscriber will also be given the option to complete their recertification form online, over the phone with TPV, or by mail. If the subscriber fails to respond with their completed form and documentation of eligibility by the 30th day of the notice period, Birch will de-enroll the customer by taking the following steps: Birch will place a Local Service Request (“LSR”) with the supporting local exchange carrier to remove the Lifeline USOC to prevent further credits; remove the credit supplied by Birch to the end user from the billing system; and the credit may only be reapplied if customer goes through certification process again. The flow-chart in Attachment B-3 provides more detail on the annual re-certification process.

De-enrollment for duplicative support. Birch understands that duplicative claims are wasteful and burden the fund, and will take all necessary steps to swiftly de-enroll consumers found to be receiving duplicative federal Lifeline discounts. Upon notification from the Commission, a state, or USAC that a subscriber is receiving Lifeline service from another carrier, or more than one member of a household is receiving Lifeline service, Birch will de-enroll the subscriber within five business days.⁴¹ To the extent de-enrollment is necessary due to duplicative support, Birch will take the following steps to de-enroll a customer: Birch will immediately place a LSR with the supporting local exchange carrier to remove the Lifeline USOC to prevent further credits; remove the credit supplied by Birch to the end user from the

⁴¹ 47 C.F.R. § 54.405(e)(2); see also *Lifeline and Link Up Reform and Modernization*, 26 FCC Rcd 9022, ¶ 15 (2011).

billing system; and have a company policy in place that the credit may only be reapplied if the customer goes through certification process again. Birch will not seek reimbursement for any de-enrolled subscriber following the date of that subscriber's de-enrollment.

De-enrollment for non-usage. As part of its de-enrollment procedures, Birch will comply with the Commission's 60-day non-usage policy. Specifically, Birch will not consider a consumer to be enrolled, and Birch will not seek reimbursement for that consumer, until the consumer activates its service in the first instance.⁴² Further, Birch will de-enroll and not seek reimbursement for any consumer whose service is inactive for a consecutive 60-day period.⁴³ Birch will define "usage" consistent with Commission rules. Specifically, the following activities will constitute "usage" of Birch's prepaid wireless Lifeline service: (1) completion of an outbound call; (2) purchase of minutes to add to the subscriber's service plan; (3) answer of an incoming call from a party other than Birch or its representative; and (4) response to direct contact from Birch and confirmation that the consumer seeks to continue receiving the Lifeline service.⁴⁴ Birch will run usage reports for each customer to determine non-usage over a period of 60 consecutive days. Despite a consumer's "usage" as defined herein and in the Commission's rules, Birch will continue to comply with its existing public safety obligations to transmit all wireless 911 calls regardless of subscriber inactivity even if Birch is no longer providing Lifeline service to that consumer.⁴⁵

When a customer has been identified for de-enrollment for non-usage, a letter will be sent to the customer, and the customer will have 30 days to respond. Birch will allow 15 calendar

⁴² 47 C.F.R. § 54.404(b)(10).

⁴³ *Lifeline Reform Order* ¶ 257.

⁴⁴ 47 C.F.R. § 54.407(c)(2); *Lifeline Reform Order* ¶ 261.

⁴⁵ *Lifeline Reform Order* ¶ 262.

days for mail delivery and handling, and a 30-day notice period thereafter. Birch will run usage monitoring reports on the customers who have been noticed and de-enroll the customer if usage is not reflected on their account by the 30th day. On the 31st day, Birch will de-enroll the customer by placing a LSR with the supporting local exchange carrier to remove the Lifeline USOC to prevent further credits and remove the credit supplied by Birch to the end user from the billing system. The flow-chart set forth in Attachment B-5 provides more information on the process for de-enrollment for non-usage.

CONCLUSION

WHEREFORE, for the forgoing reasons, Birch respectfully requests that the Commission expeditiously approve its further amended Compliance Plan and designate it as an ETC for the provision of prepaid wireless Lifeline services in the states of Alabama, Florida, North Carolina, and Tennessee.

Respectfully submitted,

BIRCH COMMUNICATIONS, INC.



Angela F. Collins
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Washington, D.C. 20006
202-862-8930 (telephone)
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acollins@cgrdc.com

Christopher J. Bunce
Vice President, Legal and General
Counsel
Birch Communications, Inc.
2300 Main Street, Suite 340
Kansas City, MO 64108
816-300-3000 (telephone)
chris.bunce@birch.com

Dated: June 29, 2012

Its Attorneys

Attachment A
to
Compliance Plan

Draft Enrollment and Certification Form



Lifeline Enrollment Form

Three Easy Steps to Complete:

Step #1 – Complete Lifeline Enrollment Form on page 2
(And if needed Household Worksheet on page 5)

Step #2 – Locate your Lifeline benefit documentation
(More info on your required documentation on pages 3 and 4)

Step #3 – Send complete enrollment form and benefit documentation to NOW Communications
(There are many convenient ways to send them, check Page 2)



Lifeline Enrollment Form

This signed application is required to enroll you in the Lifeline program in your state. This application is only for the purpose of verifying your participation in these programs and will not be used for any other purpose.

Things to know about the Lifeline Program:

- Lifeline is a Federal benefit that is not transferrable to any other person;
- Lifeline service is available for only one line per household. A household cannot receive benefits from multiple providers;
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals living at the same address that share income and expenses; and,
- Violation of the one-per household rule is not permitted under federal rules and will result in the subscriber's de-enrollment from the program and possible criminal prosecution by the U.S. Government.

First Name: _____ MI: _____ Last Name: _____ Date of Birth: _____

Last Four Digits of Social Security Number: _____ Contact Telephone Number: _____

Residential Address:

Must be a street address (not a P.O. Box) and your principal residence.

Billing Address:

May contain a P.O. Box.

Check here if the billing address is the same as the residential address.

Address Line 1: _____

Address Line 1: _____

Address Line 2: _____

Address Line 2: _____

City, State and Zip: _____

City, State and Zip: _____

This Address is: Permanent Temporary (If temporary, your address must be certified or updated every 90 days.)

A shared, multi-household residence (Complete Household Worksheet) →

(Initial)

If shared, multi-household residence, I hereby certify that other household adults do not contribute income and/or share expenses in my household. Complete Household Worksheet.

(Initial) I hereby certify that I qualify to participate in at least one of the following programs (check all that apply):

Please see the related documentation requirements on the reverse side.

Supplemental Nutrition Assistance Program (SNAP) formerly known as Food Stamps Supplemental Security Income (SSI)

Federal Public Housing Assistance (FPHA) or Section 8 Low Income Home Energy Assistance Program (LIHEAP)

National School Lunch Program's free lunch program Temporary Assistance for Needy Families (TANF) Medicaid

(initial) I hereby certify that my household income is at or below 135% of the Federal Poverty Guidelines; there are _____ members in my household.

Please see the Federal Poverty Guidelines and the related documentation requirements on the reverse side.

I certify, under penalty of perjury: Initial by Each Certification

The information provided in this application is true and correct to the best of my knowledge; I acknowledge that willfully providing false or fraudulent information in order to receive Lifeline service is punishable by fine or imprisonment, termination of all Lifeline benefits, and being barred from participating in the Lifeline program.

I acknowledge that non-usage over a consecutive 60-day period will result in my de-enrollment from this Lifeline service.

I am eligible for Lifeline service through participation in the qualifying program(s) or meeting the income requirements as identified above.

I have provided documentation of eligibility for Lifeline service, unless otherwise specifically exempted from providing such documentation.

I will inform NOW within 30 days of any potential change in eligibility, including, but not limited to: (i) a move or change of address; (ii) any change in participation in the programs identified above or change in income or household members; (iii) receiving Lifeline service from another provider; or (iv) any other change that would affect my eligibility for Lifeline service. If I fail to inform NOW of any of these changes, I understand under penalty of perjury, I may be subject to penalties.

I have provided the address where I currently reside and, if a temporary address has been provided, then I acknowledge that NOW will attempt to verify my address every 90 days, and, if I do not respond to verification attempts within 30 days, then I may be de-enrolled from my Lifeline benefits.

My household will receive only one Lifeline benefit and, to the best of my knowledge, no one in my household is currently receiving Lifeline service from any other provider.

I acknowledge that I will be required to annually re-certify eligibility and may be required to re-certify continued eligibility for Lifeline at any time and failure to re-certify will result in the termination of Lifeline benefits or other penalties.

I authorize NOW and its agents to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Lifeline service. I authorize government agencies and their authorized representatives to discuss with and/or provide information to NOW and its agents verifying my participation in public assistance programs that qualify me for Lifeline service.

I acknowledge and consent to my name, telephone number, and address being divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of verifying that I, as a subscriber, do not receive more than one Lifeline benefit. In the event that USAC identifies that I am receiving more than one Lifeline subsidy for my household, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

APPLICANT SIGNATURE/TPV ID: _____

DATE: _____

FOR NOW COMMUNICATIONS OFFICE USE ONLY

Company Representative Name: _____ Database Queried? Date: ___/___/___ Database Name: _____

ETC Eligibility Review Confirmation Type: Written, attached Screenshot, attached ETC employee

Type of Documentation reviewed: _____ State Agency Queried? Date: ___/___/___ Agency Name: _____

Type of media: _____ How received: _____ Agency contact: _____ Confirmation Type: Notice, attached

Date/Expiration Date of Documentation: ___/___/___

Identity of Documentation: _____

Date reviewed: ___/___/___

Applicant name different than name on documentation (Note: _____)

Name: _____

_____ Certification that individual is part of applicant's household

_____ Certification that individual is does not already receive Lifeline

Representative Signature: _____ Date: _____

NOTES : _____

HOW TO SUBMIT YOUR ENROLLMENT APPLICATION:

COMPLETE ENROLLMENT APPLICATION ONLINE: www.nowcommunications.com FAX: (877) 465-0545 EMAIL: nowcommunications@birch.com
POSTAL MAIL : NOW Communications, 2300 Main St., Suite 340, Kansas City, MO 64108.

HOW TO SUBMIT YOUR DOCUMENTATION:

TEXT A DOCUMENT: (816) 446-3388 FAX: (877) 465-0545 EMAIL: nowcommunications@birch.com POSTAL MAIL: NOW Communications, 2300 Main St., Suite 340, Kansas City, MO 64108.

DOCUMENTATION REQUIREMENTS

**You are required to provide proof of your participation in the programs you identified
OR proof of your qualifying income.**

PROGRAM ELIGIBILITY

If, on page 1 of this form, you indicated you were in a qualifying program. You must provide documentation to prove receipt of benefits under these programs to NOW Communications. Upon examination by NOW Communications, any copies, photos or faxes of your documentation will be destroyed or returned to you at your request. Acceptable forms of documentation are described below:

Public Housing Assistance (FPHA) or Section 8

There are two types of documentation that can prove receipt of benefits under the Public Housing Assistance (FPHA), or Section 8, Program.

First, an applicant can provide an award letter. A recipient of Public Housing Assistance (FPHA), or Section 8, receives an award letter from his or her local Public Housing Agency (PHA). The award letter should include the following information: name of program, date of award, name of beneficiary and award amount.

Second, an applicant can provide either a Public Housing Assistance Lease Agreement or a Section 8 Voucher. These items should clearly reflect the type of Public Housing Assistance credit issued.

If the beneficiary does not have an award letter, lease agreement, or voucher, the applicant can contact the agency that approved the application and request formal documentation of his or her award. To find contact information for a local Public Housing Agency, please visit the U.S. Department of Housing and Urban Development's state contact and agency listing.

The beneficiary named on the FPHA documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, NOW Communications must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Low Income Home Energy Assistance Program (LIHEAP)

Because the Low Income Home Energy Assistance Program (LIHEAP) is administered by a wide range of local agencies, the program's name may vary by state (note that most include the words "energy assistance program" in the name).

There are two types of documentation applicants can provide to demonstrate receipt of LIHEAP benefits.

First, a LIHEAP participant might have an award letter from a state agency. The award letter will include the following: name of program, date of award, name of beneficiary and award amount. In some instances, if the beneficiary received notification of his or her approval in-person, the awardee might not have a formal award letter and will need to contact the state agency that approved the application to request a formal award letter.

Second, a LIHEAP participant can provide a utility bill that reflects the Housing Assistance credit. The utility bill should clearly reflect inclusion of an Energy Assistance credit.

The beneficiary named on the LIHEAP documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline. To find contact information for a local LIHEAP agency, please visit the Low Income Home Energy Assistance Program's [state contact and agency listing](#).

National School Lunch Program's Free Lunch Program (NSLP)

Although the National School Lunch Program's Free Lunch Program (NSLFP) is a federally assisted program, award letters are provided by state agencies and, thus, will vary by locality. All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary and date of award. The beneficiary named on the NSLP documentation may be a dependent of the Lifeline applicant, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Supplemental Security Income (SSI)

Participation in the federal portion of SSI is an eligibility criterion for Lifeline. Some states offer state supplements to the federal SSI program, but receipt of benefits from the state supplement, but not federal SSI, does not qualify an individual for Lifeline. All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary, date of award and award amount. A benefit check stub from the Social Security Administration may also be submitted as proof of participation, if the check stub clearly states the date and name of the beneficiary.

The beneficiary named on the SSI documentation may be a dependent of the Lifeline applicant, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Temporary Assistance for Needy Families (TANF)

All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary and date of award.

The beneficiary named on the TANF documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

In some states, TANF might be more commonly referred to by a different name. Look for your state on this list of [TANF program names by state](#).

Supplemental Nutrition Assistance Program (SNAP)

The Supplemental Nutrition Assistance Program (SNAP) was previously known as Food Stamps. Beneficiary cards and award letters may vary because SNAP is administered on a state level. Because not all beneficiary cards include the recipient's name, it is recommended that an award letter from the local state agency be used for Lifeline verification purposes. All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary and date of award.

The beneficiary named on the SNAP documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

In some states, SNAP might be more commonly referred to by a different name. Look for your state on this list of [SNAP program names by state](#).

Medicaid

Each state provides its own unique Medicaid card to beneficiaries. However, most cards should clearly state the following: name of program, name of beneficiary, state of residence, issued or effective date and the name of the state agency that provided the card.

The beneficiary named on the Medicaid documentation may be a dependent of the Lifeline applicant, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Some states have different names for their Medicaid programs. Look for your state on this list of [Medicaid program names by state](#).

PROGRAM ELIGIBILITY

An applicant may be eligible for Lifeline if he or she has a household income at or below 135% of the Federal Poverty Guidelines. Below are the acceptable types of documentation:

- The prior year's state, federal, or Tribal tax return
- A current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement or pension statement of benefits
- An Unemployment or Workers' Compensation statement of benefits
- A federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document containing income information
- If the documentation relied on does not cover a full year, such as a

135% FEDERAL POVERTY GUIDELINES - 2012	
Members of Household	Household Income must be at or below
1	\$ 15,080
2	\$ 20,426
3	\$ 25,772
4	\$ 31,118
5	\$ 36,464
6	\$ 41,810
7	\$ 47,156
8	\$52,502
For every additional member of your household, add \$4,950.	



Optional Lifeline Household Worksheet

Complete only if you checked "A shared, multi-household residence" on your enrollment form

Name	
Address	
Telephone Number	

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner) YES NO
 - > If you checked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.
 - > If you checked NO, please answer question #2.

2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

A. A parent <input type="checkbox"/> YES <input type="checkbox"/> NO	D. An adult roommate <input type="checkbox"/> YES <input type="checkbox"/> NO
B. An adult son or daughter <input type="checkbox"/> YES <input type="checkbox"/> NO	E. Other <input type="checkbox"/> YES <input type="checkbox"/> NO
C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.) <input type="checkbox"/> YES <input type="checkbox"/> NO	

 - > If you checked NO for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.
 - > If you checked YES, please answer question #3.

3. Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2? YES NO
 - > If you checked NO, then your address includes more than one household. Please initial lines A and B below, and sign and date the worksheet.
 - > If you checked YES, then your address includes only one household. You may not sign up for Lifeline because someone in your household already receives Lifeline.

CERTIFICATION

Please initial the certifications below and sign and date this worksheet. Submit this worksheet to NOW Communications along with your Lifeline application.

- A. I certify that I live at an address occupied by multiple households.
- B. I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Signature _____ Date _____

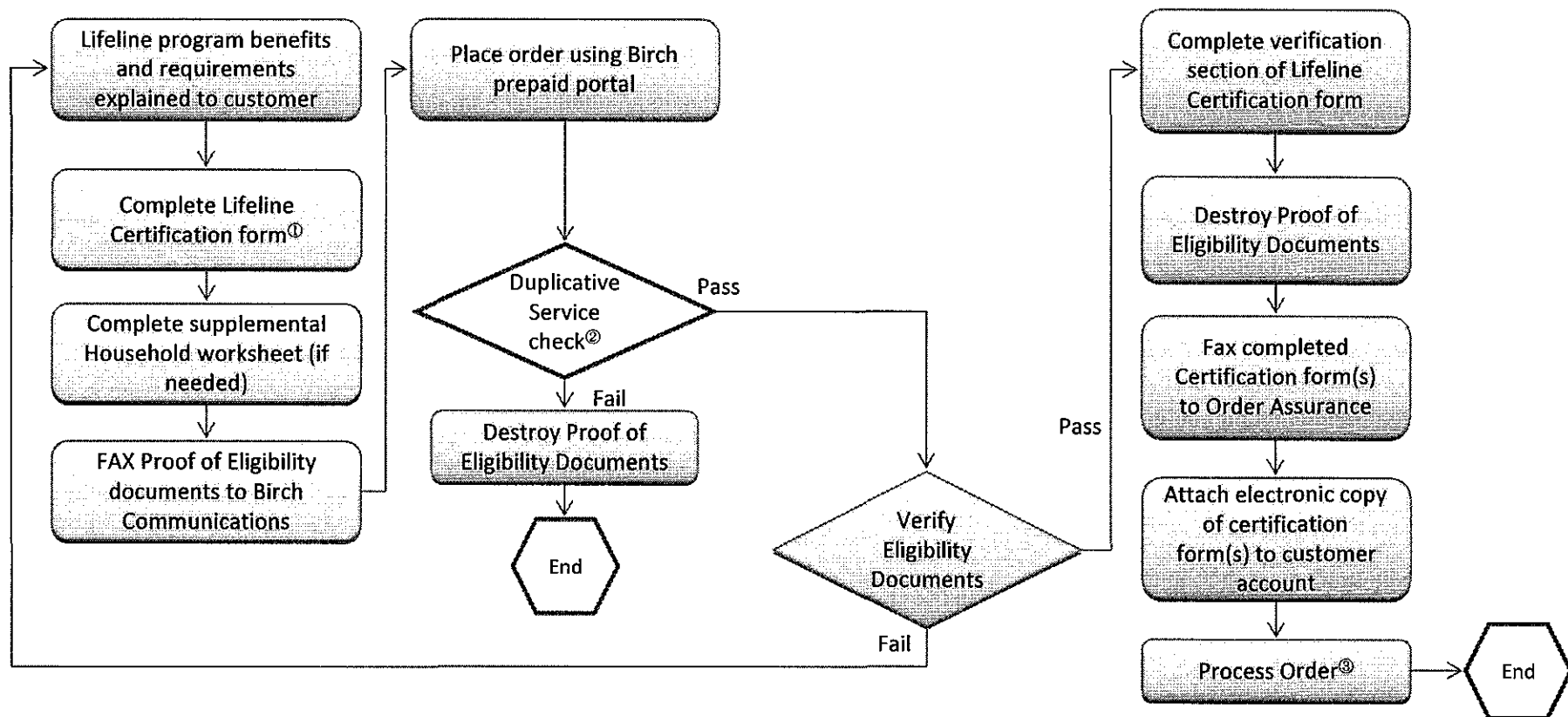
Attachment B

to

Compliance Plan

Flow-Charts Depicting Birch Internal
Processes for Lifeline Compliance

Lifeline Certification process – Internal Sales Agents

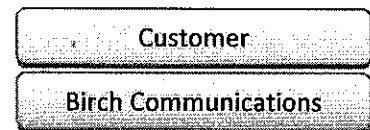


① Certification form may be completed by one of the following methods:

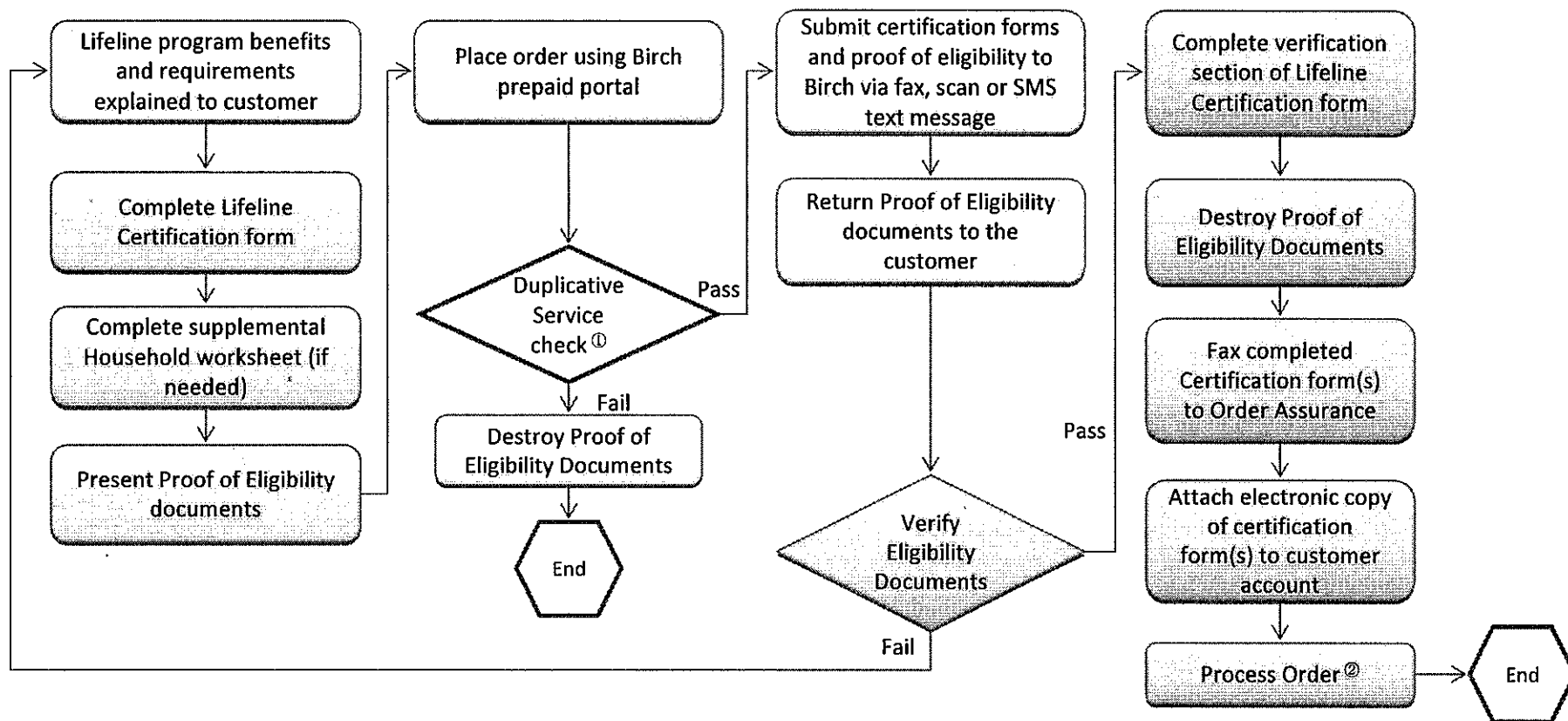
- Hand-written paper form
- Third-Party Verification (TPV)
- Electronic Signature (DocuSign)

② When duplicative service is found, Birch will determine if customer is part of multi-household residence

③ Wireless handsets will be shipped to the customer in an inactive state. Birch will not seek lifeline reimbursement from USAC until the customer activates the device and incurs usage



Lifeline Certification process – Authorized Dealers



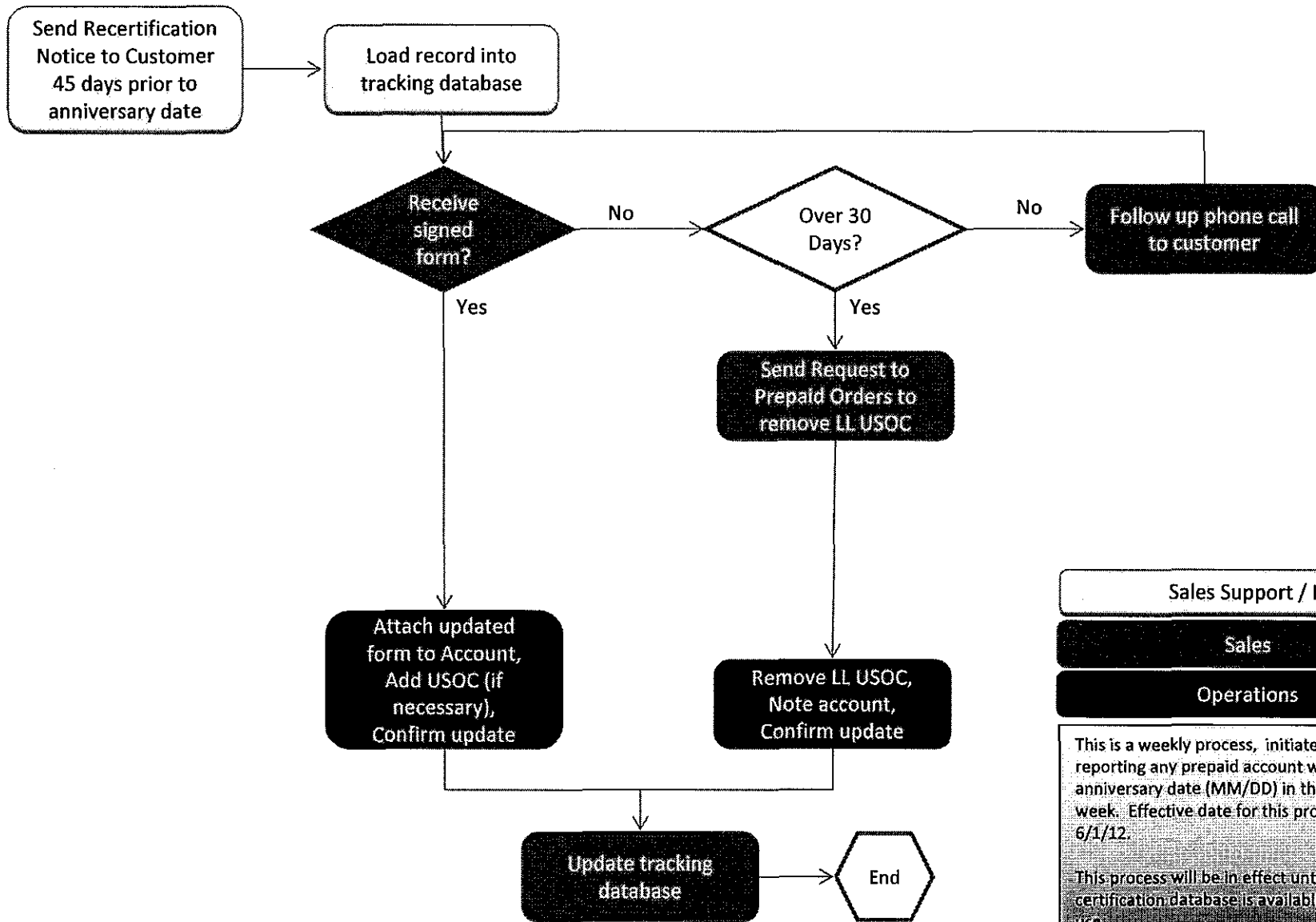
① When duplicative service is found, Birch will determine if customer is part of multi-household residence.
 ② Wireless handsets will be shipped to the customer in an inactive state. Birch will not seek lifeline reimbursement from USAC until the customer activates the device and incurs usage.

Birch Authorized Dealer

Customer

Birch Communications

Annual Lifeline Re-Certification



Sales Support / IT

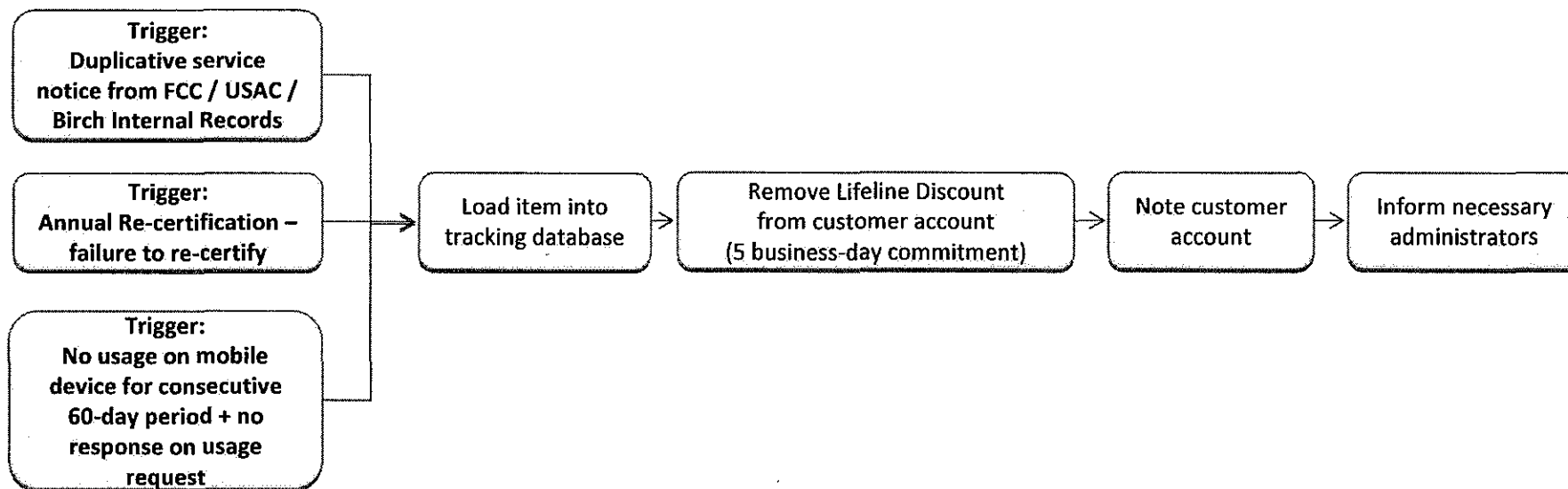
Sales

Operations

This is a weekly process, initiated by reporting any prepaid account with an anniversary date (MM/DD) in the previous week. Effective date for this process is 6/1/12.

This process will be in effect until the national certification database is available and is in use.

Lifeline De-enrollment Scenarios



- De-enrollment in Lifeline program will remove the customer from any USAC filings for reimbursement of the lifeline discount amount.
- All wireless handsets, regardless of activation status, will retain the capability of dialing and reaching emergency-911

Non-Usage notification

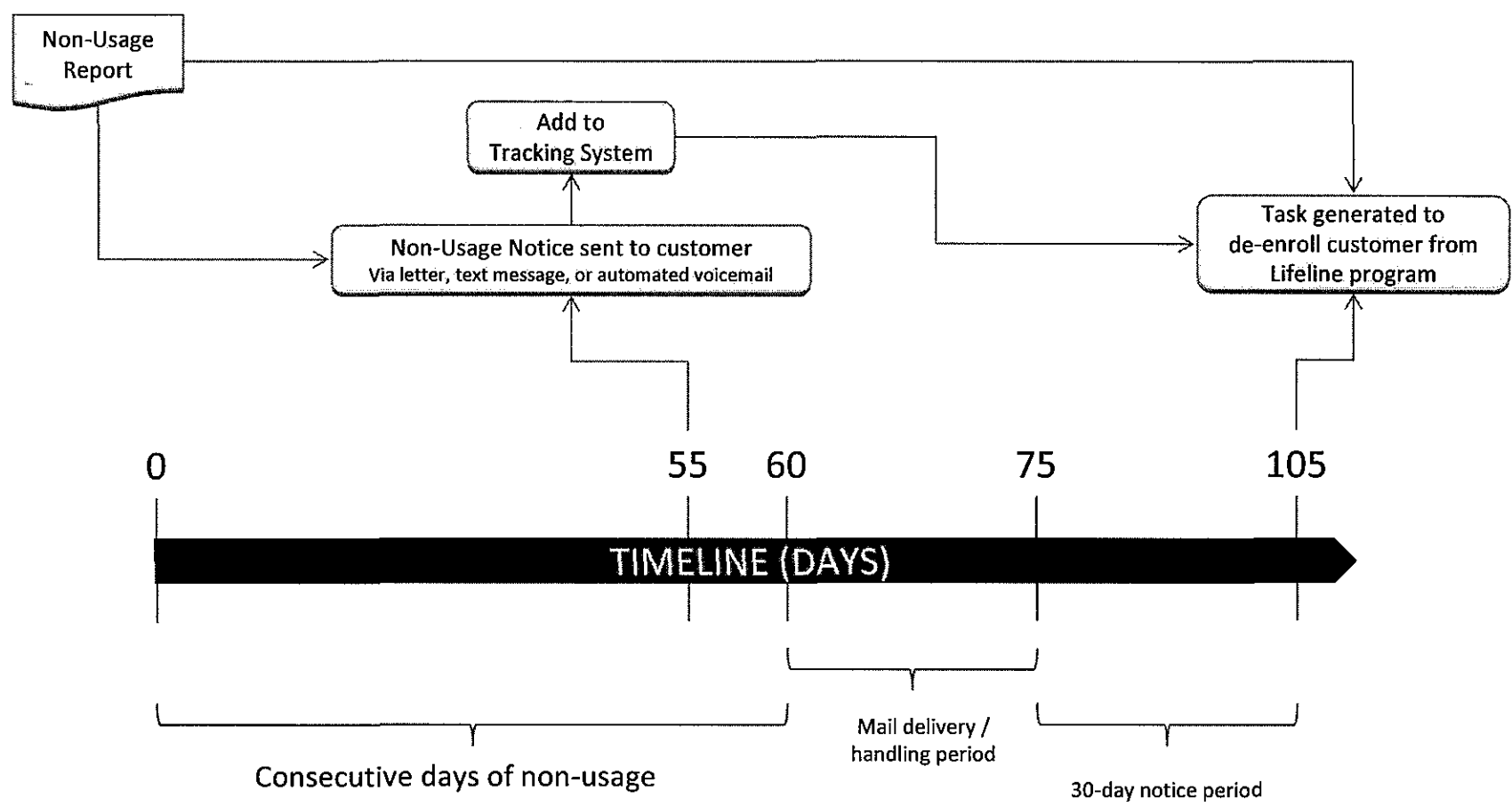


EXHIBIT 4

CAHILL GORDON & REINDEL LLP

SUITE 950

1990 K STREET, N.W.

WASHINGTON, D.C. 20006-1181

EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702
(212) 701-3000
FAX: (212) 269-5420

TELEPHONE (202) 862-8900
FACSIMILE (202) 862-8958

AUGUSTINE HOUSE
6A AUSTIN FRIARS
LONDON, ENGLAND EC2N 2HA
(011) 44.20.7920.9800
FAX: (011) 44.20.7920.9825

ANGELA F. COLLINS | 202-862-8930 | acollins@cgrdc.com

September 17, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket Nos. 09-197, 11-42
Tempo Telecom, LLC Adoption of Compliance Plan**

Dear Secretary Dortch:

Tempo Telecom, LLC (“Tempo”), by its attorneys, respectfully notifies the Federal Communications Commission (“Commission”) that Tempo will comply with and adopt as its own the Compliance Plan filed by Birch Communications, Inc. (“Birch”), which was approved by the Commission on August 8, 2012.¹

Via letter dated December 18, 2012, Birch notified the Commission that the prepaid wireless Lifeline service would be provided by a separate legal entity known as Now Communications, LLC (“Now Comm”). Now Comm committed to implement and comply with the previously-approved Compliance Plan, and notified the Commission that it adopted the Compliance Plan as its own. The Commission acknowledged these changes in corporate structure in a December 20, 2012 public notice, and confirmed that the previously-approved Compliance Plan would apply to Now Comm.²

Following the December 2012 filing, Now Communications, LLC changed its name to Tempo Telecom, LLC. Therefore, Tempo hereby notifies the Commission it will implement and comply with the Compliance Plan approved by the Commission on August 8, 2012, and hereby adopts the Compliance Plan as its own. Tempo commits to using the same procedures and policies set forth in the Compliance Plan for its provision of prepaid wireless Lifeline service,

¹ WC Docket Nos. 09-197 and 11-42, *Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless, and TAG Mobile*, Public Notice, DA 12-1286 (rel. Aug. 8, 2012).

² *Wireline Competition Bureau Seeks Comment on Petitions for Designation as a Low-Income Eligible Telecommunications Carrier filed by Now Comm, Zing PCS, LTS, Odin Wireless, and TX Mobile*, 27 FCC Rcd 15937 (2012) (“The Wireline Competition Bureau has approved Birch’s compliance plan, which will also apply to Now Comm.”)

and will market and advertise its prepaid wireless Lifeline service in the same manner as described in the Compliance Plan.

A copy of the Compliance Plan adopted by Tempo is attached, along with a cover sheet indicating Tempo's adoption of the Compliance Plan.

Please contact the undersigned if you have any questions regarding this matter

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Angela Collins". The signature is written in a cursive, flowing style.

Angela F. Collins
Counsel to Tempo Telecom, LLC

Attachment

cc: Michelle Schaefer (via electronic mail)

EXHIBIT 5

TEMPO OFFICERS

Dr. R. Kirby Godsey Chairman of the Board

Dr. Godsey is Chairman of the Board of Birch Communications and an owner of Tempo. Prior to becoming Chairman of the Board at Birch in 2007, Dr. R. Kirby Godsey served as the 17th president of Mercer University from 1979-2006. Prior to his appointment as President, he served as Executive Vice President and as Dean of the College of Liberal Arts. Prior to coming to Mercer in 1977, Dr. Godsey was Vice President and Dean of the College at Averett College in Danville, Virginia. Dr. Godsey earned his undergraduate degree in history and religion from Samford University in Birmingham, Alabama. He holds Master of Divinity and Doctor of Theology degrees from New Orleans Baptist Theological Seminary, and a Master of Arts in Philosophy from the University of Alabama. In 1969, he earned a Ph.D. in Philosophy from Tulane University. The University of South Carolina, Averett College and Samford University have all awarded him honorary degrees.

Vincent Oddo President & CEO

Vincent M. Oddo serves as President and Chief Executive Officer of Birch Communications and Tempo. In this capacity, he is responsible for the overall strategic direction of the company as well as playing a critical role in the many acquisitions that have been completed to date. Mr. Oddo is a 25+ year veteran of the telecom industry and has specialized in growing, restructuring and managing wire-line, wireless and broadband telecommunications businesses. Prior to joining Birch in 2003, he served as SVP and COO of Network Telephone; SVP and CIO of NuVox Communications; SVP of BellSouth; and SVP of Graphic Scanning Corp. Mr. Oddo holds both a Bachelor of Arts degree and Masters degree in Public Administration from Long Island University.

Chris Aversano Chief Operating Officer and Executive Vice President

Chris Aversano serves as Chief Operating Officer and Executive Vice President of Birch Communications and Tempo. In this capacity, he is responsible for managing the overall Operations and Engineering efforts of the company. Mr. Aversano is a 20+ year veteran of the telecommunications and engineering industries and has specialized in wire-line, wireless, and satellite communications. Prior to joining Birch in 2004, he served as VP of Service Delivery and Engineering Operations at Network Telephone Corp; VP of Provisioning at Nuvox; Director of Process Design at Covad Communications; and Program Manager for the United States Air Force responsible for Global Positioning System (GPS) Satellites. Mr. Aversano holds a Bachelor of Science degree in Electrical Engineering from Clemson University, as well as an Associates Degree in Telecommunications from the United States Air Force.

Edward James**Chief Financial Officer and Senior Vice President**

Edward James serves as Chief Financial Officer and Senior Vice President of Birch Communications and Tempo. In this capacity, he is responsible for maintaining and reporting the financial health of the company and overseeing the corporate assets of the company. Mr. James is a nearly 20 year veteran of the telecommunications and finance industries. Prior to joining Birch in 2008, he served as CFO of American Telecom Services, Inc.; Director of Finance of Carter's Inc.; various accounting, operations and finance positions at United Parcel Service (UPS). Mr. James holds a Bachelor of Arts degree from Mississippi College, and a Masters in Business Administration degree from Cumberland University.

Christopher Ramsey**Senior Vice President - Chief Sales & Marketing Officer**

Chris Ramsey serves as Senior Vice President - Chief Sales and Marketing Officer for Birch Communications and Tempo. In this capacity, he is responsible for managing the overall sales and marketing efforts of the company. Mr. Ramsey is a 9-year veteran of Birch Communications who was responsible for starting and managing the telesales, account management and inside sales channels. Prior to joining Birch in 2001, he served in various leadership positions, of increasing responsibility, in Worldwide Account Management for Black and Veatch and GE Capital Assurance, Inc. Mr. Ramsey holds a Bachelor of Arts degree from Southwest Baptist University.

Chris Bunce**Senior Vice President, Legal, and General Counsel**

Mr. Bunce serves as Senior Vice President, Legal & Regulatory, and General Counsel. In this capacity, he is responsible for managing the legal operations, and legal and regulatory compliance functions of both Birch and Tempo. Mr. Bunce is a nearly 20-year veteran in communications and telecom law. Prior to joining Birch in 2000, he served as legal counsel for GST Telecom, CallAmerica, Whole Earth Networks, Hawaii Online and other telecommunications and Internet firms. Mr. Bunce holds a Bachelor's degree in both History and Journalism/Mass Communication from Iowa State University, and a Juris Doctor degree from the University of Iowa College of Law.

EXHIBIT 6

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLLI	RC ABBRE	CITY	STATE	OCN NAME
ADA MNXA	ADA	ADA	MN	LORETEL SYSTEMS, INC.
ADBNMNXA	AUDUBON	AUDUBON	MN	LORETEL SYSTEMS, INC.
ADMSMNXB	ADAMS	ADAMS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ADRMNXA	ADRIAN	ADRIAN	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
AFTNMNAF	STCROIXBCH	AFTON	MN	QWEST CORPORATION
ALBOMNXB	ALBORN	ALBORN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ALBYMNXA	ALBANY	ALBANY	MN	ALBANY MUTUAL TELEPHONE ASSOCIATION, INC.
ALDNMNXB	ALDEN	ALDEN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ALLEMNAL	ALBERT LEA	ALBERT LEA	MN	QWEST CORPORATION
ALMLMNXA	TWINCITIES	ALMELUND	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ALTRMNXA	ALTURA	ALTURA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
ALVDMNXA	ALVARADO	ALVARADO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ALXNMNXA	ALEXANDRIA	ALEXANDRIA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
ALXNMNXL	ALEXANDRIA	ALEXANDRIA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
AMBYMNXA	AMBOY	AMBOY	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
ANDLMNXB	ANNANDALE	ANNANDALE	MN	WINDSTREAM LAKEDALE, INC.
ANOKMNAN	TWINCITIES	ANOKA	MN	QWEST CORPORATION
APPLMNAP	APPLETON	APPLETON	MN	QWEST CORPORATION
APVYMNXA	TWINCITIES	APPLE VALLEY	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
ARCOMNXA	ARCO	ARCO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ARTNMNXA	ARLINGTON	ARLINGTON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
ASHBMNXA	ASHBY	ASHBY	MN	PARK REGION MUTUAL TELEPHONE CO.
ASKVMNXA	ASKOV	ASKOV	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ATKNMNXA	AITKIN	AITKIN	MN	EMBARQ MINNESOTA DBA CENTURYLINK
ATWRMNXA	ATWATER	ATWATER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
AURRMNXA	AURORA	AURORA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
AUSTMNAB	AUSTIN	AUSTIN	MN	QWEST CORPORATION
AVOCMNXA	AVOCA	AVOCA	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
AVONMNVO	AVON	AVON	MN	QWEST CORPORATION
BBCYMNXB	BIG BEND	MILAN	MN	FEDERATED TELEPHONE COOPERATIVE
BCKRMNXA	BECKER	BECKER	MN	SHERBURNE COUNTY RURAL TELEPHONE CO.
BCKSMNXB	BACKUS	BACKUS	MN	ARVIG TELEPHONE CO.
BECDMNXB	BECIDA	BECIDA	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

CLLI	RC ABBRE	CITY	STATE	OGN NAME
BENAMNXB	BENA	BENA	MN	ARROWHEAD COMMUNICATIONS CORP.
BFLKMNXB	BUFFALO LK	BUFFALO LAKE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
BFLOMNBU	TWINCITIES	BUFFALO	MN	QWEST CORPORATION
BGLKMNXA	BIG LAKE	BIG LAKE	MN	SHERBURNE COUNTY RURAL TELEPHONE CO.
BGLWMNXB	BIGELOW	BIGELOW	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BGLYMNXB	BAGLEY	BAGLEY	MN	GARDEN VALLEY TELEPHONE CO.
BKTNMNXB	BROOKSTON	BROOKSTON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BLANMNBL	TWINCITIES	BLAINE	MN	QWEST CORPORATION
BLATMNXB	BALATON	BALATON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
BLERMNXB	BLUE EARTH	BLUE EARTH	MN	BLUE EARTH VALLEY TELEPHONE CO.
BLGRMNXB	BELGRADE	BELGRADE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BLKDMNXB	BLACKDUCK	BLACKDUCK	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
BLLPMNXA	TWINCITIES	BELLE PLAINE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
BLPRMNXB	BLOOMNPRRI	BLOOMING PRAIRIE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BLTNMNCE	TWINCITIES	BLOOMINGTON	MN	QWEST CORPORATION
BLTNMNNO	TWINCITIES	BLOOMINGTON	MN	QWEST CORPORATION
BLTNMNNO	TWINCITIES	BLOOMINGTON	MN	QWEST CORPORATION
BLTRMNXB	BELTRAMI	BELTRAMI	MN	GARDEN VALLEY TELEPHONE CO.
BLVWMNXB	BELVIEW	BELVIEW	MN	REDWOOD COUNTY TELEPHONE CO.
BMDJMNBE	BEMIDJI	BEMIDJI	MN	QWEST CORPORATION
BNSNMNXB	BENSON	BENSON	MN	EMBARQ MINNESOTA DBA CENTURYLINK
BNVLMNXB	BENNETTVL	BENNETTVILLE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
BOCKMNXB	BOCK	BOCK	MN	BENTON COOPERATIVE TELEPHONE CO.
BOVLMNXB	BROWERVL	BROWERVILLE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
BOYDMNXB	BOYD	BOYD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BRCTMNBC	TWINCITIES	BROOKLYN CENTER	MN	QWEST CORPORATION
BRHMMNBR	BRAHAM	BRAHAM	MN	QWEST CORPORATION
BRKSMNXB	BROOKS	BROOKS	MN	GARDEN VALLEY TELEPHONE CO.
BRNDMNXB	BRANDON	BRANDON	MN	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
BRNMMNBA	BARNUM	BARNUM	MN	QWEST CORPORATION
BRNRMNBR	BRAINERD	BRAINERD	MN	QWEST CORPORATION
BROTMNXB	BROOTEN	BROOTEN	MN	MID-STATE TELEPHONE CO.
BRPTMNXB	BREEZY PT	BREEZY POINT	MN	ARVIG TELEPHONE CO.

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLLI	RC ABBRE	CITY	STATE	OCN NAME
BRRTMNXB	BARRETT	BARRETT	MN	RUNESTONE TELEPHONE ASSOCIATION
BRSNMNXB	BRIMSON	BRIMSON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BRTHMNXB	BERTHA	BERTHA	MN	EAST OTTER TAIL TELEPHONE CO.
BRTNMNXB	BROWNTON	BROWNTON	MN	EMBARQ MINNESOTA DBA CENTURYLINK
BRVIMNXB	BARNESVL	BARNESVILLE	MN	CITY OF BARNESVILLE TELEPHONE UTILITY
BRVIMNXR	BARNESVL	BARNESVILLE	MN	RED RIVER RURAL TEL ASSN. - MN
BRVLMNBU	TWINCITIES	BURNSVILLE	MN	QWEST CORPORATION
BRVLMNXA	TWINCITIES	BURNSVILLE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
BRWSMNXA	BREWSTER	BREWSTER	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
BTFDMNXB	BUTTERFLD	BUTTERFIELD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BTLKMNBA	BATTLELAKE	BATTLE LAKE	MN	QWEST CORPORATION
BUHLMNBU	BUHL	BUHL	MN	QWEST CORPORATION
BVCKMNXA	LUVERNE	BEAVER CREEK	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
BWBKMNBI	BIWABIK	BIWABIK	MN	QWEST CORPORATION
BWDLMNXB	BROWNSDALE	BROWNSDALE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BWVLMNXB	BROWNSVL	BROWNSVILLE	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
BYLDMNXB	BYGLAND	BYGLAND	MN	HALSTAD TELEPHONE CO.
BYRNMNXB	BYRON	BYRON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
BYRVMNXB	BOY RIVER	BOY RIVER	MN	JOHNSON TELEPHONE CO.
CARLMNXC	CARLOS	CARLOS	MN	EMBARQ MINNESOTA DBA CENTURYLINK
CHOKMNXC	CHOKIO	CHOKIO	MN	FEDERATED TELEPHONE COOPERATIVE
CHSHMNCS	CHISHOLM	CHISHOLM	MN	QWEST CORPORATION
CHSKMNXC	CHASKA	CHASKA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
CHSTMNCH	GRAND RPDS	COHASSET	MN	QWEST CORPORATION
CKTNMNCR	CROOKSTON	CROOKSTON	MN	QWEST CORPORATION
CLCYMNXB	CLARA CITY	CLARA CITY	MN	CLARA CITY TELEPHONE EXCHANGE CO.
CLEMMNXC	CLEMENTS	CLEMENTS	MN	CLEMENTS TELEPHONE CO.
CLFDMNXC	CLARKFIELD	CLARKFIELD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CLGNMNXC	CHASKA	COLOGNE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
CLGVMNXC	CLARKS GRV	CLARKS GROVE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CLLKMNXA	CLEAR LAKE	CLEAR LAKE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CLMTMNXA	CLAREMONT	CLAREMONT	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CLMXMNXC	CLIMAX	CLIMAX	MN	HALSTAD TELEPHONE CO.

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

CLLI	RC ABBRE	CITY	STATE	OCN NAME
CLQTMNCA	CLOQUET	CLOQUET	MN	QWEST CORPORATION
CLRNMNCO	COLERAINE	COLERAINE	MN	QWEST CORPORATION
CLRSMNXC	CLARISSA	CLARISSA	MN	EAGLE VALLEY TELEPHONE CO.
CLSPMNCB	COLDSPRING	COLD SPRING	MN	QWEST CORPORATION
CLTNMNXA	CLINTON	CLINTON	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
CLWRMNXC	CLEARWATER	CLEARWATER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CLWYMNXC	CALLAWAY	CALLAWAY	MN	CALLAWAY TELEPHONE EXCHANGE
CMBAMNXC	CAMBRIA	CAMBRIA	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
CMBRMNCA	CAMBRIDGE	CAMBRIDGE	MN	QWEST CORPORATION
CMFRMNXC	COMFREY	COMFREY	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CMPBMNXA	CAMPBELL	CAMPBELL	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
CMSTMNCO	COMSTOCK	COMSTOCK	MN	QWEST CORPORATION
CNFLMNXC	CANNON FLS	CANNON FALLS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CNGRMNXC	CONGER	CONGER	MN	WINNEBAGO COOP. TELEPHONE ASSN. - MINNESOTA
CNRPMNND	TWINCITIES	COON RAPIDS	MN	QWEST CORPORATION
COKTMNXC	COKATO	COKATO	MN	EMBARQ MINNESOTA DBA CENTURYLINK
CRGRMNXC	CERROGORDO	CERRO GORDO	MN	FARMERS MUTUAL TELEPHONE CO.
CRMRMNXC	CORMORANT	CORMORANT	MN	LORETEL SYSTEMS, INC.
CRRLMNXA	CORRELL	APPLETON	MN	FEDERATED TELEPHONE COOPERATIVE
CRSBMNXC	CROSBY	CROSBY	MN	EMBARQ MINNESOTA DBA CENTURYLINK
CRTOMNCB	CARLTON	CARLTON	MN	QWEST CORPORATION
CRWLMNXC	CROMWELL	CROMWELL	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CRYSMNCR	TWINCITIES	CRYSTAL	MN	QWEST CORPORATION
CSLKMNXA	CROSS LAKE	CROSS LAKE	MN	CROSSLAKE TELEPHONE CO.
CSMSMNXC	COSMOS	COSMOS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CSSLMNCL	CASS LAKE	CASS LAKE	MN	QWEST CORPORATION
CTFDMNCH	CHATFIELD	CHATFIELD	MN	QWEST CORPORATION
CTGVMNCG	TWINCITIES	COTTAGE GROVE	MN	QWEST CORPORATION
CTTNMNXC	COTTON	COTTON	MN	ARROWHEAD COMMUNICATIONS CORP.
CTWDMNXC	COTTONWOOD	COTTONWOOD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
CURRMNXC	CURRIE	CURRIE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
CYLMNXC	CEYLON	CEYLON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
CYRSMNXC	CYRUS	CYRUS	MN	RUNESTONE TELEPHONE ASSOCIATION

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLLI	RC ABBRE	CITY	STATE	OGN NAME
DAKTMNXD	DAKOTA	DAKOTA	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
DANBMNXD	DANUBE	DANUBE	MN	K M P TELEPHONE COMPANY
DDCTMNXD	DODGE CTR	DODGE CENTER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
DELNMNXD	TWINCITIES	DELANO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
DENTMNXD	DENT	DENT	MN	EAST OTTER TAIL TELEPHONE CO.
DLFTMNXD	DELFT	DELFT	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
DLTHMNAF	DULUTH	DULUTH	MN	QWEST CORPORATION
DLTHMNCB	DULUTH	DULUTH	MN	QWEST CORPORATION
DLTHMNDB	DULUTH	DULUTH	MN	QWEST CORPORATION
DLTHMNLA	DULUTH	DULUTH	MN	QWEST CORPORATION
DLTHMNME	DULUTH	DULUTH	MN	QWEST CORPORATION
DLTHMNPL	DULUTH	DULUTH	MN	QWEST CORPORATION
DLTNMNXD	DALTON	DALTON	MN	PARK REGION MUTUAL TELEPHONE CO.
DNHMMNXD	DENHAM	DENHAM	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
DNLYMNXD	DONNELLY	DONNELLY	MN	RUNESTONE TELEPHONE ASSOCIATION
DNNLMNXD	DUNNELL	DUNNELL	MN	DUNNELL TELEPHONE CO., INC.
DNVSMNXD	DANVERS	DANVERS	MN	FEDERATED TELEPHONE COOPERATIVE
DRCKMNXD	DEER CREEK	DEER CREEK	MN	EAST OTTER TAIL TELEPHONE CO.
DRRVMNXD	DEER RIVER	DEER RIVER	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
DRWDMNXD	DEERWOOD	DEERWOOD	MN	EMBARQ MINNESOTA DBA CENTURYLINK
DSSLMNXD	DASSEL	DASSEL	MN	EMBARQ MINNESOTA DBA CENTURYLINK
DTLKMNDL	DETROITLKS	DETROIT LAKES	MN	QWEST CORPORATION
DUNDMNXA	DUNDEE	DUNDEE	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
DXTRMNXA	DEXTER	DEXTER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
EAGNMNLB	TWINCITIES	EAGAN	MN	QWEST CORPORATION
ECHNMNXE	EAST CHAIN	EAST CHAIN	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
ECHOMNXE	ECHO	ECHO	MN	REDWOOD COUNTY TELEPHONE CO.
EDPRMNEP	TWINCITIES	EDEN PRAIRIE	MN	QWEST CORPORATION
EDPRMNGP	TWINCITIES	EDEN PRAIRIE	MN	QWEST CORPORATION
EDVVMNXE	EDENVALLEY	EDEN VALLEY	MN	MELROSE TELEPHONE CO.
EGBNMNXE	EAGLE BEND	EAGLE BEND	MN	MIDWEST TELEPHONE CO.
EGLKMNXE	EAGLE LAKE	EAGLE LAKE	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
EGTNMNXE	EDGERTON	EDGERTON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLLI	RC ABBRE	CITY	STATE	OCN NAME
EKRV MNER	TWINCITIES	ELK RIVER	MN	QWEST CORPORATION
ELDLMNXA	ELLEDALE	ELLEDALE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ELGNMNXE	ELGIN	ELGIN	MN	EMBARQ MINNESOTA DBA CENTURYLINK
ELLKMNXE	ELBOW LAKE	ELBOW LAKE	MN	RUNESTONE TELEPHONE ASSOCIATION
ELRSMNXE	ELROSA	ELROSA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ELWOMNXE	ELLSWORTH	ELLSWORTH	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
ELY MNXE	ELY	ELY	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ELYSMNXE	ELYSIAN	ELYSIAN	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
EMLYMNXA	EMILY	EMILY	MN	EMILY COOPERATIVE TELEPHONE CO.
EMMNMNXE	EMMONS	EMMONS	MN	WINNEBAGO COOP. TELEPHONE ASSN. - MINNESOTA
ENFDMNXE	ENFIELD	ENFIELD	MN	BRIDGE WATER TELEPHONE CO.
ERHRMNXE	ERHARD	ERHARD	MN	PARK REGION MUTUAL TELEPHONE CO.
ERSKMNXA	ERSKINE	ERSKINE	MN	GARDEN VALLEY TELEPHONE CO.
EVLTMNEV	VIRGINIA	EVELETH	MN	QWEST CORPORATION
EVVLMNXE	EVANSVILLE	EVANSVILLE	MN	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
EXCLMNEX	TWINCITIES	EXCELSIOR	MN	QWEST CORPORATION
EYOTMNXE	EYOTA	EYOTA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
FAMTMNXF	FAIRMONT	FAIRMONT	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
FAMTNDBC	FAIRMOUNT	FAIRMOUNT	MN	RED RIVER RURAL TEL ASSN - ND
FARGNDBC	FARGO	FARGO	MN	QWEST CORPORATION
FDDMMNXF	FEDERALDAM	FEDERAL DAM	MN	JOHNSON TELEPHONE CO.
FKLN MNXF	FRANKLIN	FRANKLIN	MN	MINNESOTA VALLEY TELEPHONE CO., INC.
FLWDMNXF	FLOODWOOD	FLOODWOOD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
FNSNMNXF	FINLAYSON	FINLAYSON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
FOLYMNFO	FOLEY	FOLEY	MN	QWEST CORPORATION
FONTMNXF	FOUNTAIN	FOUNTAIN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
FOTNMNXF	FORESTON	FORESTON	MN	BENTON COOPERATIVE TELEPHONE CO.
FRAZMNXF	FRAZEE	FRAZEE	MN	LORETEL SYSTEMS, INC.
FRBLMNFA	FARIBAULT	FARIBAULT	MN	QWEST CORPORATION
FRDH MNXF	FREEDHEM	FREEDHEM	MN	CONSOLIDATED TELEPHONE CO.
FRDLMNFR	TWINCITIES	FRIDLEY	MN	QWEST CORPORATION
FRFLMNFB	FERGUS FLS	FERGUS FALLS	MN	QWEST CORPORATION
FRFXMNXA	FAIRFAX	FAIRFAX	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLLI	RC/ABBRE	CITY	STATE	OCN_NAME
FRLKMNFL	TWINCITIES	FOREST LAKE	MN	QWEST CORPORATION
FRPTMNXF	FREEPORT	FREEPORT	MN	ALBANY MUTUAL TELEPHONE ASSOCIATION, INC.
FRTL MNXF	FERTILE	FERTILE	MN	GARDEN VALLEY TELEPHONE CO.
FRTN MNXF	TWINCITIES	FARMINGTON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
FSHR MNXF	FISHER	FISHER	MN	HALSTAD TELEPHONE CO.
FSTN MNXF	FOSSTON	FOSSTON	MN	GARDEN VALLEY TELEPHONE CO.
FULDMNXA	FULDA	FULDA	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
GARY MNXG	GARY	GARY	MN	TWIN VALLEY - ULEN TELEPHONE CO., INC.
GBBN MNXA	GIBBON	GIBBON	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
GDFR NDBC	EGRNDFORKS	GRAND FORKS	MN	QWEST CORPORATION
GDMD MNXG	GRAND MDW	GRAND MEADOW	MN	HOME TELEPHONE CO.
GDMR MNMG	GRANDMRAIS	GRAND MARAIS	MN	QWEST CORPORATION
GDRG MNXG	GOODRIDGE	GOODRIDGE	MN	GARDEN VALLEY TELEPHONE CO.
GDRP MNGR	GRAND RPDS	GRAND RAPIDS	MN	QWEST CORPORATION
GDTH MNXG	GOODTHUNDR	GOOD THUNDER	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
GHNT MNXG	GHENT	GHENT	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
GLCOM MNXG	GLENCOE	GLENCOE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
GLLY MNXG	GULLY	GULLY	MN	GARDEN VALLEY TELEPHONE CO.
GLMN MNXG	GILMAN	GILMAN	MN	BENTON COOPERATIVE TELEPHONE CO.
GLND MNXA	GLENDORADO	GLENDORADO	MN	SHERBURNE COUNTY RURAL TELEPHONE CO.
GLVLMNGL	GLENVILLE	GLENVILLE	MN	QWEST CORPORATION
GLVY MNOR	TWINCITIES	GOLDEN VALLEY	MN	QWEST CORPORATION
GLWDMNGL	GLENWOOD	GLENWOOD	MN	QWEST CORPORATION
GLYN MNXG	GLYNDON	GLYNDON	MN	LORETEL SYSTEMS, INC.
GNWLMNXG	GREENWALD	GREENWALD	MN	MELROSE TELEPHONE CO.
GODH MNXG	GOODHUE	GOODHUE	MN	SLEEPY EYE TELEPHONE CO.
GRADMNXG	GRANADA	GRANADA	MN	GRANADA TELEPHONE CO.
GRCY MNXG	GARDENCITY	GARDEN CITY	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
GRFDMNXG	GARFIELD	GARFIELD	MN	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
GRFL MNXG	GRANITEFLS	GRANITE FALLS	MN	EMBARQ MINNESOTA DBA CENTURYLINK
GRISMNXG	GREEN ISLE	GREEN ISLE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
GRSN MNXG	GARRISON	GARRISON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
GRVN MNXG	GARVIN	GARVIN	MN	WOODSTOCK TELEPHONE CO.

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLL	RC ABBRE	CITY	STATE	OCN NAME
GRYEMNXG	GREY EAGLE	GREY EAGLE	MN	MELROSE TELEPHONE CO.
GTWYMNXG	GATEWAY	GATEWAY	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
GVCYMNXG	GROVE CITY	GROVE CITY	MN	EMBARQ MINNESOTA DBA CENTURYLINK
GYLRMNGA	GAYLORD	GAYLORD	MN	QWEST CORPORATION
HAMLMNHB	TWINCITIES	HAMEL	MN	QWEST CORPORATION
HBNGMNHI	HIBBING	HIBBING	MN	QWEST CORPORATION
HCKNMNXH	HACKENSACK	HACKENSACK	MN	ARVIG TELEPHONE CO.
HCTRMNXA	HECTOR	HECTOR	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
HFMMNXH	HOFFMAN	HOFFMAN	MN	RUNESTONE TELEPHONE ASSOCIATION
HILSMNXH	HILLS	HILLS	MN	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - MN
HLCYMNXA	HILL CITY	HILL CITY	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
HLFRMNCO	HOLDINGFD	HOLDINGFORD	MN	QWEST CORPORATION
HLLDMNXH	HOLLAND	HOLLAND	MN	WOODSTOCK TELEPHONE CO.
HLWYMNXA	HOLLOWAY	HOLLOWAY	MN	FEDERATED TELEPHONE COOPERATIVE
HMCYMNXH	HOLMESCITY	HOLMES CITY	MN	EMBARQ MINNESOTA DBA CENTURYLINK
HNCCMNXH	HANCOCK	HANCOCK	MN	FEDERATED TELEPHONE COOPERATIVE
HNCKMNHI	HINCKLEY	HINCKLEY	MN	QWEST CORPORATION
HNFLMNXH	HANLEY FLS	HANLEY FALLS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
HNNGMNHE	HENNING	HENNING	MN	QWEST CORPORATION
HNSNMNXH	HENDERSON	HENDERSON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
HNVRMNHB	TWINCITIES	HANOVER	MN	QWEST CORPORATION
HODLMNXH	HOLLANDALE	HOLLANDALE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
HOKHMNXH	HOKAH	HOKAH	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
HOLTMNXH	HOLT	HOLT	MN	WIKSTROM TELEPHONE CO., INC.
HPKNMNHO	TWINCITIES	HOPKINS	MN	QWEST CORPORATION
HRLDMNXH	HARTLAND	HARTLAND	MN	MANCHESTER - HARTLAND TELEPHONE CO.
HRLKMNXA	HERON LAKE	HERON LAKE	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
HRMNMNXA	HERMAN	HERMAN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
HRWKMNXH	HARDWICK	HARDWICK	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
HSNGMNXH	HASTINGS	HASTINGS	MN	EMBARQ MINNESOTA DBA CENTURYLINK
HSTNMNXH	HOUSTON	HOUSTON	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
HTSNMNXH	HUTCHINSON	HUTCHINSON	MN	HUTCHINSON TELEPHONE CO.
HVLDMNXA	HOVLAND	HOVLAND	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK

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GLLI	RC ABBRE	CITY	STATE	OCN_NAME
HWLKMNXH	HOWARDLAKE	HOWARD LAKE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
HWLYMNHA	HAWLEY	HAWLEY	MN	QWEST CORPORATION
HYFDMNXA	HAYFIELD	HAYFIELD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
HZRNMNXA	HAZEL RUN	HAZEL RUN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
IDCRMNXI	IDEAL COR	IDEAL CORNERS	MN	ARVIG TELEPHONE CO.
IRNGMNXI	IRVING	IRVING	MN	MID-STATE TELEPHONE CO.
ISLEMNXI	ISLE	ISLE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ISLKMNIL	DULUTH	ISLAND LAKE	MN	QWEST CORPORATION
ISNTMNIS	TWINCITIES	ISANTI	MN	QWEST CORPORATION
ITSPMNXA	PARKRAPIDS	ITASCA STATE PARK	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
IVNHMNXI	IVANHOE	IVANHOE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
JCBSMNXJ	JACOBSON	JACOBSON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
JCSNMNJA	JACKSON	JACKSON	MN	QWEST CORPORATION
JFRSMNXA	JEFFERS	JEFFERS	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
JNVLMNXJ	JANESVILLE	JANESVILLE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
JRDNMNXJ	TWINCITIES	JORDAN	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
JSPRMNXJ	JASPER	JASPER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
KDYHMNXA	KANDIYOHI	KANDIYOHI	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
KETNMNXK	KENSINGTON	KENSINGTON	MN	RUNESTONE TELEPHONE ASSOCIATION
KEWTMNKE	KEEWATIN	KEEWATIN	MN	QWEST CORPORATION
KLKNMNXK	KILKENNY	KILKENNY	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
KLLGMNXA	KELLOGG	KELLOGG	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
KMBLMNXK	KIMBALL	KIMBALL	MN	MELROSE TELEPHONE CO.
KMBRMNXK	KIMBERLY	KIMBERLY	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
KNYNMNXA	AMUND	KENYON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
KRKHMNXK	KERKHOVEN	KERKHOVEN	MN	K M P TELEPHONE COMPANY
KSSNMNXK	KASSON	KASSON	MN	KASSON & MANTORVILLE TELEPHONE CO.
KSTRMNXL	KIESTER	KIESTER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
KTRVMNXK	KETTLE RIV	KETTLE RIVER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
LACRMNXL	LACRESCENT	LA CRESCENT	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
LAPTMNXL	LAPORTE	LAPORTE	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
LECTMNXL	LE CENTER	LE CENTER	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
LEDRMNXL	LEADER	LEADER	MN	CONSOLIDATED TELEPHONE CO.

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CLLI	RC ABBRE	CITY	STATE	OCN NAME
LESRMNLS	LE SUEUR	LE SUEUR	MN	QWEST CORPORATION
LFYTMNXA	LAFAYETTE	LAFAYETTE	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
LGVL MNXL	LONGVILLE	LONGVILLE	MN	EAST OTTER TAIL TELEPHONE CO.
LKBN MNXL	LAKEBENTON	LAKE BENTON	MN	INTERSTATE TELECOM. COOP., INC. - MINNESOTA
LKCRMNXL	LK CRYSTAL	LAKE CRYSTAL	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
LKCY MNXL	LAKE CITY	LAKE CITY	MN	EMBARQ MINNESOTA DBA CENTURYLINK
LKFD MNXL	LAKEFIELD	LAKEFIELD	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
LKLL MNXL	LK LILLIAN	LAKE LILLIAN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
LKPK MNXL	LAKE PARK	LAKE PARK	MN	LORETEL SYSTEMS, INC.
LKVL MNXL	TWINCITIES	LAKEVILLE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
LKWLMNXL	LAKEWILSON	LAKE WILSON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
LMTN MNXA	LAMBERTON	LAMBERTON	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
LNCL MNXL	LINCOLN	LINCOLN	MN	CONSOLIDATED TELEPHONE CO.
LNDL MNXB	LONSDALE	LONSDALE	MN	LONSDALE TELEPHONE CO., INC.
LNGB MNXL	LENGBY	LENGBY	MN	GARDEN VALLEY TELEPHONE CO.
LNPR MNXL	LONGPRAIRI	LONG PRAIRIE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
LNRD MNXL	LEONARD	LEONARD	MN	GARDEN VALLEY TELEPHONE CO.
LNST MNXL	LINDSTROM	LINDSTROM	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
LSMR MNXL	LISMORE	LISMORE	MN	LISMORE COOPERATIVE TELEPHONE CO.
LSPR MNXL	LESTERPRRI	LESTER PRAIRIE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
LSTN MNXA	LEWISTON	LEWISTON	MN	EMBARQ MINNESOTA DBA CENTURYLINK
LTFD MNLI	LITCHFIELD	LITCHFIELD	MN	QWEST CORPORATION
LTFL MNLF	LITTLE FLS	LITTLE FALLS	MN	QWEST CORPORATION
LUCN MNXL	LUCAN	LUCAN	MN	MINNESOTA VALLEY TELEPHONE CO., INC.
LVRN MNLU	LUVERNE	LUVERNE	MN	QWEST CORPORATION
LWRY MN01	LOWRY	LOWRY	MN	RUNESTONE TEL. ASSN DBA RUNESTONE TELECOM ASSO.
LWVL MNXL	LEWISVILLE	LEWISVILLE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
LYLEMNXM	LYLE	LYLE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
LYND MNXL	LYND	LYND	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MADLMNXM	MADELIA	MADELIA	MN	CHRISTENSEN COMMUNICATIONS COMPANY
MAIN MNXM	MAINE	MAINE	MN	PARK REGION MUTUAL TELEPHONE CO.
MALM MNXM	MALMO	MALMO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MAYR MNXM	TWINCITIES	MAYER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN

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CLLI	RC ABBRE	CITY	STATE	OCN NAME
MCGRMNXM	MCGREGOR	MCGREGOR	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MCINMNXM	MCINTOSH	MCINTOSH	MN	GARDEN VALLEY TELEPHONE CO.
MDLDMNXA	MEADOWLND	MEADOWLANDS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MDSL MNXM	MADISON LK	MADISON LAKE	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
MDSN MNXM	MADISON	MADISON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
MGR TMNXM	MCGRATH	MCGRATH	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MHNMMNMA	MAHNOMEN	MAHNOMEN	MN	QWEST CORPORATION
MILCMNXM	MILACA	MILACA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MILN MNXM	MILAN	MILAN	MN	FEDERATED TELEPHONE COOPERATIVE
MIVL MNXM	MILLERVL	MILLERVILLE	MN	GARDONVILLE COOPERATIVE TELEPHONE ASSN.
MLRSMNXM	MELROSE	MELROSE	MN	MELROSE TELEPHONE CO.
MLRY MNXM	MILROY	MILROY	MN	MINNESOTA VALLEY TELEPHONE CO., INC.
MLTN MNXM	MILTONA	MILTONA	MN	MIDWEST TELEPHONE CO.
MLVLMNXM	MILLVILLE	MILLVILLE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
MNCH MNXM	MANCHESTER	MANCHESTER	MN	MANCHESTER - HARTLAND TELEPHONE CO.
MNET MNXA	MINNEOTA	MINNEOTA	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
MNHGMNXM	MENAHGA	MENAHGA	MN	WEST CENTRAL TELEPHONE ASSOCIATION
MNK TMNXM	MANKATO	MANKATO	MN	MANKATO CITIZENS TELEPHONE CO. DBA HICKORYTECH
MNR VMNXM	MINERVA	MINERVA	MN	GARDEN VALLEY TELEPHONE CO.
MNTIMNXM	MONTICELLO	MONTICELLO	MN	BRIDGE WATER TELEPHONE CO.
MNTR MNXM	MENTOR	MENTOR	MN	GARDEN VALLEY TELEPHONE CO.
MNVLMNXM	MANTORVL	MANTORVILLE	MN	KASSON & MANTORVILLE TELEPHONE CO.
MOLKMNML	MOOSE LAKE	MOOSE LAKE	MN	QWEST CORPORATION
MONDMNXA	TWINCITIES	MOUND	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MORAMNMO	MORA	MORA	MN	QWEST CORPORATION
MPBAMNXM	MAPLE BAY	MAPLEBAY	MN	GARDEN VALLEY TELEPHONE CO.
MPGVMNXA	OSSEO	MAPLE GROVE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
MPLKMNXA	MAPLE LAKE	MAPLE LAKE	MN	WINDSTREAM LAKEDALE, INC.
MPLSMN07	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNBB	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNBE	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNDT	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNFR	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION

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CLLI	RC_ABBRE	CITY	STATE	OCN_NAME
MPLSMNFS	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNGE	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNPE	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNPI	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPLSMNTF	TWINCITIES	MINNEAPOLIS	MN	QWEST CORPORATION
MPPLMNXM	TWINCITIES	MAPLE PLAIN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MPTNMNXM	MAPLETON	MAPLETON	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
MPWDMNMA	TWINCITIES	MAPLEWOOD	MN	QWEST CORPORATION
MRBLMNMA	MARBLE	MARBLE	MN	QWEST CORPORATION
MRCLMNXM	MARCELL	MARCELL	MN	PEOPLES TELEPHONE CO. MN
MRDCMNXM	MURDOCK	MURDOCK	MN	K M P TELEPHONE COMPANY
MRGNMNXM	MORGAN	MORGAN	MN	REDWOOD COUNTY TELEPHONE CO.
MRRSMNMO	MORRIS	MORRIS	MN	QWEST CORPORATION
MRSHMNMA	MARSHALL	MARSHALL	MN	QWEST CORPORATION
MRTWMNXM	MORRISTOWN	MORRISTOWN	MN	CANNON VALLEY TELECOM, INC.
MSSNMNXM	MISSION	MISSION	MN	CONSOLIDATED TELEPHONE CO.
MTGMMNXM	MONTGOMERY	MONTGOMERY	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
MTIRMNMI	VIRGINIA	MOUNTAIN IRON	MN	QWEST CORPORATION
MTLKMNXM	MOUNTAINLK	MOUNTAIN LAKE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
MTLYMNXM	MOTLEY	MOTLEY	MN	CONSOLIDATED TELEPHONE CO.
MTRSMNXB	MONTWAVE	MONTROSE-WAVERLY	MN	WINDSTREAM LAKEDALE, INC.
MTVDMNMO	MONTEVIDEO	MONTEVIDEO	MN	QWEST CORPORATION
MYNRMNXM	MAYNARD	MAYNARD	MN	CLARA CITY TELEPHONE EXCHANGE CO.
MZPPMNXM	MAZEPPA	MAZEPPA	MN	SLEEPY EYE TELEPHONE CO.
NBRNMNNB	NORTH BRCH	NORTH BRANCH	MN	QWEST CORPORATION
NCLTMNNC	NICOLLET	NICOLLET	MN	QWEST CORPORATION
NCSNMNXN	NICKERSON	NICKERSON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
NEVSMNXN	NEVIS	NEVIS	MN	EAST OTTER TAIL TELEPHONE CO.
NKLMNXN	NOKAY LAKE	NOKAY LAKE	MN	CONSOLIDATED TELEPHONE CO.
NLVLMNXN	NIELSVILLE	NIELSVILLE	MN	HALSTAD TELEPHONE CO.
NMRDMNXN	NIMROD	NIMROD	MN	WEST CENTRAL TELEPHONE ASSOCIATION
NRCRMNXN	NORCROSS	NORCROSS	MN	RUNESTONE TELEPHONE ASSOCIATION
NRFDMNNO	NORTHFIELD	NORTHFIELD	MN	QWEST CORPORATION

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CELL	RC ABBRE	CITY	STATE	OCN NAME
NROP MNXN	NORTHROP	NORTHROP	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
NRWDMNXN	NORWOOD	NORWOOD	MN	EMBARQ MINNESOTA DBA CENTURYLINK
NSHWMNNA	NASHWAUK	NASHWAUK	MN	QWEST CORPORATION
NSPLMNPR	TWINCITIES	NORTH ST PAUL	MN	QWEST CORPORATION
NSSWMNNI	NISSWA	NISSWA	MN	QWEST CORPORATION
NVRRMNNA	TWINCITIES	NAVARRE	MN	QWEST CORPORATION
NWBTMNCL	TWINCITIES	NEW BRIGHTON	MN	QWEST CORPORATION
NWGRMNXN	TWINCITIES	NEW GERMANY	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
NWLD MNXN	NEW RICHLD	NEW RICHLAND	MN	EMBARQ MINNESOTA DBA CENTURYLINK
NWLNMNXN	NEW LONDON	NEW LONDON	MN	MID-STATE TELEPHONE CO.
NWMNMNXN	NEW MUNICH	NEW MUNICH	MN	ALBANY MUTUAL TELEPHONE ASSOCIATION, INC.
NWMRMNXN	NEW MARKET	NEW MARKET	MN	SCOTT RICE TEL CO. DBA INTEGRA TELECOM
NWPRMNXN	NEW PRAGUE	NEW PRAGUE	MN	ECKLES TELEPHONE CO.
NWULMNXN	NEW ULM	NEW ULM	MN	NEW ULM TELECOM, INC.
NYMLMNXN	NEWYORK ML	NEW YORK MILLS	MN	EAST OTTER TAIL TELEPHONE CO.
ODIN MNXO	ODIN	ODIN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
OGLVMNOA	OGILVIE	OGILVIE	MN	QWEST CORPORATION
OKBN MNXO	OKABENA	OKABENA	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
OKGVMNOG	TWINCITIES	OAK GROVE	MN	QWEST CORPORATION
OKLEMNXO	OKLEE	OKLEE	MN	GARDEN VALLEY TELEPHONE CO.
OLIVMNOL	BIRDISLAND	OLIVIA	MN	QWEST CORPORATION
ONAM MNXO	ONAMIA	ONAMIA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ORNC MNXO	ORONOCO	ORONOCO	MN	PINE ISLAND TELEPHONE CO.
OSAG MNXO	OSAGE	OSAGE	MN	EAST OTTER TAIL TELEPHONE CO.
OSKSMNXO	OSAKIS	OSAKIS	MN	OSAKIS TELEPHONE CO.
OSLO MNXO	OSLO	OSLO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
OSSEMNXO	OSSEO	OSSEO	MN	EMBARQ MINNESOTA DBA CENTURYLINK
OTNG MNXO	OUTING	OUTING	MN	CONSOLIDATED TELEPHONE CO.
OTRT MNXO	OTTERTAIL	OTTERTAIL	MN	EAST OTTER TAIL TELEPHONE CO.
OWTN MNOW	OWATONNA	OWATONNA	MN	QWEST CORPORATION
PALOMNXP	PALO	PALO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
PEASMNXP	PEASE	PEASE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
PENCMNXP	PENNOCK	PENNOCK	MN	K M P TELEPHONE COMPANY

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GLLI	RC ABBRE	CITY	STATE	OCN NAME
PIRZMNXA	PIERZ	PIERZ	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
PKRPMNPR	PARKRAPIDS	PARK RAPIDS	MN	QWEST CORPORATION
PLATMNXP	PLATO	PLATO	MN	EMBARQ MINNESOTA DBA CENTURYLINK
PLGRMNXP	PILLAGER	PILLAGER	MN	CONSOLIDATED TELEPHONE CO.
PLMOMNFE	TWINCITIES	PLYMOUTH	MN	QWEST CORPORATION
PLMRMNXP	PLUMMER	PLUMMER	MN	GARDEN VALLEY TELEPHONE CO.
PLRPMNXP	PELICANRPD	PELICAN RAPIDS	MN	LORETEL SYSTEMS, INC.
PLSDMNXP	PALISADE	PALISADE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
PLVWMNXP	PLAINVIEW	PLAINVIEW	MN	EMBARQ MINNESOTA DBA CENTURYLINK
PMTNMNXP	PEMBERTON	PEMBERTON	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
PNCYMNPC	PINE CITY	PINE CITY	MN	QWEST CORPORATION
PNISMNXP	PINEISLAND	PINE ISLAND	MN	PINE ISLAND TELEPHONE CO.
PNRVMNXP	PINE RIVER	PINE RIVER	MN	ARVIG TELEPHONE CO.
PPSKMNXP	PUPOSKY	PUPOSKY	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
PPSTMNPI	PIPESTONE	PIPESTONE	MN	QWEST CORPORATION
PQLKMNXP	PEQUOT LKS	PEQUOT LAKES	MN	ARVIG TELEPHONE CO.
PRBGMNXP	PRINSBURG	PRINSBURG	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
PRHMMNXP	PERHAM	PERHAM	MN	EAST OTTER TAIL TELEPHONE CO.
PRLKMNXP	PRIOR LAKE	PRIOR LAKE	MN	SCOTT RICE TEL CO. DBA INTEGRA TELECOM
PRLYMNXP	PERLEY	PERLEY	MN	LORETEL SYSTEMS, INC.
PRPRMNXP	PARKESPRRI	PARKERS PRAIRIE	MN	MIDWEST TELEPHONE CO.
PRTNMNPR	PRINCETON	PRINCETON	MN	QWEST CORPORATION
PSTNMNXA	PRESTON	PRESTON	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
PTSNMNXP	PETERSON	PETERSON	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
RACNMNXR	RACINE	RACINE	MN	HOME TELEPHONE CO.
RAMYMNXR	RAMEY	RAMEY	MN	BENTON COOPERATIVE TELEPHONE CO.
RCFDMN66	TWINCITIES	RICHFIELD	MN	QWEST CORPORATION
RCFRMNRO	TWINCITIES	ROCKFORD	MN	QWEST CORPORATION
RCMDMNXR	RICHMOND	RICHMOND	MN	MELROSE TELEPHONE CO.
RDFLMNRA	MORTON	REDWOOD FALLS	MN	QWEST CORPORATION
RDFLMNXF	RED DEL	REDWOOD FALLS	MN	REDWOOD COUNTY TELEPHONE CO.
RDFLMNXR	RED DEL	REDWOOD FALLS	MN	REDWOOD COUNTY TELEPHONE CO.
RDWNMNRW	RED WING	RED WING	MN	QWEST CORPORATION

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GLL	RC ABBRE	CITY	STATE	OCN NAME
REMRMNXR	REMER	REMER	MN	JOHNSON TELEPHONE CO.
RGRSMNXR	OSSEO	ROGERS	MN	EMBARQ MINNESOTA DBA CENTURYLINK
RICEMNXR	RICE	RICE	MN	BENTON COOPERATIVE TELEPHONE CO.
RKDLMNXR	ROCK DELL	ROCK DELL	MN	KASSON & MANTORVILLE TELEPHONE CO.
RLFLMNXR	REDLKFALLS	RED LAKE FALLS	MN	GARDEN VALLEY TELEPHONE CO.
RLGGMNXR	ROLLAG	ROLLAG	MN	RED RIVER RURAL TEL ASSN. - MN
RLNGMNXR	ROLLINGSTN	ROLLINGSTONE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
RNDLMNXR	RANDALL	RANDALL	MN	CONSOLIDATED TELEPHONE CO.
RNLKMNXA	ROUND LAKE	ROUND LAKE	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
RNVLMNXA	RENVILLE	RENVILLE	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
ROCHMNRO	ROCHESTER	ROCHESTER	MN	QWEST CORPORATION
RSCYMNRC	RUSH CITY	RUSH CITY	MN	QWEST CORPORATION
RSFRMNXR	RUSHFORD	RUSHFORD	MN	ACE TELEPHONE ASSOCIATION - MINNESOTA
RSHMMNXA	RUSHMORE	RUSHMORE	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
RSMTMNXR	TWINCITIES	ROSEMOUNT	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
RSSLMNXA	RUSSELL	RUSSELL	MN	WOODSTOCK TELEPHONE CO.
RTHSMNXR	ROTHSAY	ROTHSAY	MN	ROTHSAY TELEPHONE CO., INC.
RTTNMNXR	RUTHTON	RUTHTON	MN	WOODSTOCK TELEPHONE CO.
RYMNMNXA	RAYMOND	RAYMOND	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
RYTNMNRN	ROYALTON	ROYALTON	MN	QWEST CORPORATION
SABNMNSA	SABIN	SABIN	MN	QWEST CORPORATION
SCHRMNXS	SACREDHERT	SACRED HEART	MN	SACRED HEART TELEPHONE CO.
SCNDMNXS	SCANDIMRIN	SCANDIA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
SDVLMNSO	TWINCITIES	SODERVILLE	MN	QWEST CORPORATION
SEBKMN01	SEBEKA	SEBEKA	MN	WEST CENTRAL TELEPHONE ASSOCIATION
SEDNMNXS	SEDAN	SEDAN	MN	MID-STATE TELEPHONE CO.
SGLKMNXS	STURGEONLK	STURGEON LAKE	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
SHBNMNXS	SHERBURN	SHERBURN	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
SHKPMNSH	TWINCITIES	SHAKOPEE	MN	QWEST CORPORATION
SHLYMNXS	SHELLY	SHELLY	MN	HALSTAD TELEPHONE CO.
SHVNMNXS	SHEVLIN	SHEVLIN	MN	GARDEN VALLEY TELEPHONE CO.
SHVWMNRI	TWINCITIES	SHOREVIEW	MN	QWEST CORPORATION
SKCTMNSC	SAUKCENTRE	SAUK CENTRE	MN	QWEST CORPORATION

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

GLLI	RC ABBRE	CITY	STATE	OCN_NAME
SLEYMNXS	HANSKA	SLEEPY EYE	MN	SLEEPY EYE TELEPHONE CO.
SLLKMNXS	SILVERLAKE	SILVER LAKE	MN	EMBARQ MINNESOTA DBA CENTURYLINK
SLWYMNXS	SOLWAY	SOLWAY	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
SNBGMNXS	SUNBURG	SUNBURG	MN	MID-STATE TELEPHONE CO.
SNBRMNXS	SANBORN	SANBORN	MN	WESTERN TELEPHONE CO.
SNDSMNSA	SANDSTONE	SANDSTONE	MN	QWEST CORPORATION
SOHNMNXS	SOUTHHAVEN	SOUTH HAVEN	MN	WINDSTREAM LAKEDALE, INC.
SPCRMNXS	SPICER	SPICER	MN	MID-STATE TELEPHONE CO.
SPFDMNXS	SPRINGFLD	SPRINGFIELD	MN	WESTERN TELEPHONE CO.
SPLSMNST	STAPLES	STAPLES	MN	QWEST CORPORATION
SPVYMNXA	SPRING VLY	SPRING VALLEY	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
SQLKMNXS	SQUAW LAKE	SQUAW LAKE	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
STBNMNXS	TWINCITIES	ST BONIFACIUS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
STCDMNTD	ST CLOUD	ST CLOUD	MN	QWEST CORPORATION
STCHMNCS	ST CHARLES	ST CHARLES	MN	QWEST CORPORATION
STCLMNXS	ST CLAIR	ST CLAIR	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
STENMNXS	SO STEEN	STEEN	MN	ALLIANCE COMMUNICATIONS COOPERATIVE, INC. - IA
STHRMNXS	ST HILAIRE	ST HILAIRE	MN	GARDEN VALLEY TELEPHONE CO.
STJMMNXS	ST JAMES	ST JAMES	MN	EMBARQ MINNESOTA DBA CENTURYLINK
STJSMNSJ	ST JOSEPH	ST JOSEPH	MN	QWEST CORPORATION
STMCMNXS	OSSEO	ST MICHAEL	MN	EMBARQ MINNESOTA DBA CENTURYLINK
STMNMNXS	ST MARTIN	ST MARTIN	MN	MELROSE TELEPHONE CO.
STPLMNBE	TWINCITIES	ST PAUL	MN	QWEST CORPORATION
STPLMNEM	TWINCITIES	ST PAUL	MN	QWEST CORPORATION
STPLMNH	TWINCITIES	ST PAUL	MN	QWEST CORPORATION
STPLMNMI	TWINCITIES	ST PAUL	MN	QWEST CORPORATION
STPLMNMK	TWINCITIES	ST PAUL	MN	QWEST CORPORATION
STPRMNSP	NEW SWEDEN	ST PETER	MN	QWEST CORPORATION
STRBMNXS	STARBUCK	STARBUCK	MN	STARBUCK TELEPHONE CO.
STVLMNST	STEWARTVL	STEWARTVILLE	MN	QWEST CORPORATION
STWRMNST	STILLWATER	STILLWATER	MN	QWEST CORPORATION
STWTMNXS	STEWART	STEWART	MN	EMBARQ MINNESOTA DBA CENTURYLINK
SVEAMNXS	SVEA	SVEA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

OLLI	RC ABBRE	CITY	STATE	OCN_NAME
SVLKMNXS	SULLIVANLK	SULLIVAN LAKE	MN	CONSOLIDATED TELEPHONE CO.
SWVLMNSV	SWANVILLE	SWANVILLE	MN	QWEST CORPORATION
TOFTMNTB	TOFTE	TOFTE	MN	QWEST CORPORATION
TRACMNTR	TRACY	TRACY	MN	QWEST CORPORATION
TRFLMNTH	THIFRIVFLS	THIEF RIVER FALLS	MN	QWEST CORPORATION
TRMNMNXT	TRUMAN	TRUMAN	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
TRMTMNXT	TRIMONT	TRIMONT	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
TRRCMNXT	TERRACE	TERRACE	MN	MID-STATE TELEPHONE CO.
TRRVMNXT	TURTLE RIV	TURTLE RIVER	MN	PAUL BUNYAN RURAL TELEPHONE COOPERATIVE
TWHRMNXA	TWOHARBORS	TWO HARBORS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
TWLKMNXT	TWIN LAKES	TWIN LAKES	MN	WINNEBAGO COOP. TELEPHONE ASSN. - MINNESOTA
TYFLMNXT	TAYLORSFLS	TAYLORS FALLS	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
TYLRMNXT	TYLER	TYLER	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
ULENMNXU	ULEN	ULEN	MN	TWIN VALLEY - ULEN TELEPHONE CO., INC.
UNWDMNXU	UNDERWOOD	UNDERWOOD	MN	PARK REGION MUTUAL TELEPHONE CO.
UPSLMN XU	UPSALA	UPSALA	MN	UPSALA COOPERATIVE TELEPHONE ASSOCIATION
URBNMN XU	URBANK	URBANK	MN	MIDWEST TELEPHONE CO.
VCTAMNXV	CHASKA	VICTORIA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
VESTMN XV	VESTA	VESTA	MN	REDWOOD COUNTY TELEPHONE CO.
VKNGMN XV	VIKING	VIKING	MN	WIKSTROM TELEPHONE CO., INC.
VLRDMNXV	VILLARD	VILLARD	MN	EMBARQ MINNESOTA DBA CENTURYLINK
VNNGMN XV	VINING	VINING	MN	PARK REGION MUTUAL TELEPHONE CO.
VRCTMN XV	VERNON CTR	VERNON CENTER	MN	MID-COMMUNICATIONS, INC. DBA HICKORYTECH
VRDLMNXV	VERNDALE	VERNDALE	MN	WEST CENTRAL TELEPHONE ASSOCIATION
VRGNMNVI	VIRGINIA	VIRGINIA	MN	QWEST CORPORATION
VRGSMNXV	VERGAS	VERGAS	MN	EAST OTTER TAIL TELEPHONE CO.
WABNMNXA	WAUBUN	WAUBUN	MN	TWIN VALLEY - ULEN TELEPHONE CO., INC.
WACNMNXW	CHASKA	WACONIA	MN	EMBARQ MINNESOTA DBA CENTURYLINK
WADNMNWA	WADENA	WADENA	MN	QWEST CORPORATION
WARBMNXA	WARBA	WARBA	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WASCMNWA	WASECA	WASECA	MN	QWEST CORPORATION
WBLKMNWB	TWINCITIES	WHITE BEAR LAKE	MN	QWEST CORPORATION
WBSHMNWA	WABASHA	WABASHA	MN	QWEST CORPORATION

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

CLLI	RC ABBRE	CITY	STATE	OCN NAME
WBSSMNWX	WABASSO	WABASSO	MN	REDWOOD COUNTY TELEPHONE CO.
WBSTMNXW	WEBSTER	WEBSTER	MN	SCOTT RICE TEL CO. DBA INTEGRA TELECOM
WCNCMNXW	W CONCORD	WEST CONCORD	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WDLKMNXW	WOOD LAKE	WOOD LAKE	MN	REDWOOD COUNTY TELEPHONE CO.
WDRFMNXW	WALDORF	WALDORF	MN	EMBARQ MINNESOTA DBA CENTURYLINK
WDSTMNXW	WOODSTOCK	WOODSTOCK	MN	WOODSTOCK TELEPHONE CO.
WHERMNXW	WHITEEARTH	WHITE EARTH	MN	TWIN VALLEY - ULEN TELEPHONE CO., INC.
WHKNMNXW	WAHKON	WAHKON	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WHPHMNXW	WHIPHOLT	WHIPHOLT	MN	EAST OTTER TAIL TELEPHONE CO.
WHTNNDDB	BRECKENRDG	WAHPETON	MN	QWEST CORPORATION
WINOMNWI	WINONA	WINONA	MN	QWEST CORPORATION
WLCMMNXW	WELCOME	WELCOME	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
WLGVMNXW	WALNUT GRV	WALNUT GROVE	MN	REDWOOD COUNTY TELEPHONE CO.
WLKRMNXW	WALKER	WALKER	MN	EAST OTTER TAIL TELEPHONE CO.
WLLKMNXW	WOLF LAKE	WOLF LAKE	MN	WEST CENTRAL TELEPHONE ASSOCIATION
WLMRMNWI	WILLMAR	WILLMAR	MN	QWEST CORPORATION
WLMTMNXA	WILMONT	WILMONT	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
WMLKMNA	WOMAN LAKE	WOMAN LAKE	MN	ARVIG TELEPHONE CO.
WNDLMNXW	WENDELL	WENDELL	MN	RUNESTONE TELEPHONE ASSOCIATION
WNDMMNWI	WINDOM	WINDOM	MN	QWEST CORPORATION
WNGRMNXW	WINGER	WINGER	MN	GARDEN VALLEY TELEPHONE CO.
WNMNMNXW	WANAMINGO	WANAMINGO	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WNSTMNXW	WINSTED	WINSTED	MN	WINSTED TELEPHONE CO.
WNTHMNXW	WINTHROP	WINTHROP	MN	WINTHROP TELEPHONE CO.
WOTNMNXW	WORTHINGTN	WORTHINGTON	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
WRGHMNXW	WRIGHT	WRIGHT	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WSBKMNXA	STORDEN	WESTBROOK	MN	CENTURYTEL OF MINNESOTA INC DBA CENTURYLINK
WSPLMNWS	TWINCITIES	WEST ST PAUL	MN	QWEST CORPORATION
WTKNMNXW	WATKINS	WATKINS	MN	MELROSE TELEPHONE CO.
WTTWMNXW	TWINCITIES	WATERTOWN	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WTVLMNXW	WATERVILLE	WATERVILLE	MN	FRONTIER COMMUNICATIONS OF MINNESOTA, INC.
WVTNMNXW	WOLVERTON	WOLVERTON	MN	WOLVERTON TELEPHONE CO. - MN
WYKFMNXW	WYKOFF	WYKOFF	MN	HOME TELEPHONE CO.

Tempo's designated service area in Minnesota is Sprint's wireless coverage area or Sprint's licensed service area, which comprises a portion of or the entirety of the following exchanges:

CELL	RC ABBRE	CITY	STATE	OCN_NAME
WYNGMNXA	TWINCITIES	WYOMING	MN	CITIZENS TELECOM CO MN-FRONTIER CITIZENS COM-MN
WYZTMNWA	TWINCITIES	WAYZATA	MN	QWEST CORPORATION
ZMBRMNXZ	ZUMBROTA	ZUMBROTA	MN	ZUMBROTA TELEPHONE CO.
ZMFLMNXZ	ZUMBRO FLS	ZUMBRO FALLS	MN	EMBARQ MINNESOTA DBA CENTURYLINK
ZMMNMNXA	ZIMMERMAN	ZIMMERMAN	MN	SHERBURNE COUNTY RURAL TELEPHONE CO.

EXHIBIT 7

FREE
FREE

Cell Phone

250 Mins Every Month!

1-8XX-XXX-XXXX

You may qualify if you participate in programs such as Food Stamps or Medicaid.

**No contract. No credit check.
No hidden fees.**

Tempo is a Lifeline supported service, a government assistance program. Only eligible customers may enroll in the program. See if you qualify for a free phone with free monthly service! Service is limited to one discount per household, consisting of either wireline or wireless service. Rules and forms of documentation necessary for enrollment are listed on reverse. Service is non-transferable.

connect
pics
friends
family



learn
talk smile
communicate
explore
text

tempo
Communications
at your pace.

FREE Cell Phone & Free Minute Plan

Choose your FREE monthly plan!

250 minutes/750 Texts
-or-
150 minutes/450 Texts
with Rollover

Included Features

Nationwide Calling
Text Messaging
Caller ID
Voicemail
Additional Minute Plans
911 Service

Call to Qualify!

Tempo is a Lifeline supported service, a government assistance program. Only eligible customers may enroll in the program. Lifeline benefits are limited to a single line of service per household. You may not receive multiple Lifeline benefits. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both. You must present Photo ID and Proof of Benefit to obtain service. You may qualify if you have Food Stamps, Medicaid, or are enrolled in other governmental assistance programs.

To sign up or ask us a question,
we're ready to help!

1-8XX-XXX-XXXX



tempo



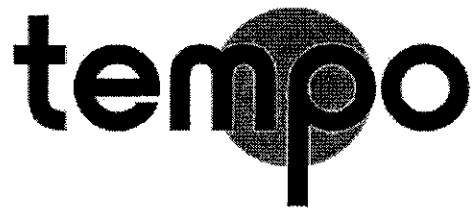
Forms of documentation necessary for enrollment: All subscribers will be required to demonstrate eligibility based at least on (1) Household income at or below 135% of Fed Poverty guidelines for a household of that size; OR (2) the household's participation in a qualifying state, federal or Tribal program, (a) current or prior year's statement of benefits from a qualifying state, federal or Tribal program. (b) a notice letter of participation in a qualifying state, federal or Tribal program. (c) program participation documents (eg: consumers SNAP card, Medicaid card, or copy thereof). (d) other official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.

Income eligibility: prior year's state, federal or Tribal tax return, current income statement from an employer or paycheck. Social Security statement of benefits. Veterans Administration statement of benefits. Retirement/pension statement of benefits. Unemployment / Workmen's comp statement of benefits. Federal or Tribal notice letter of participation in General Assistance. Divorce decree, child support award, or other official document containing income information for at least three (3) months time. Tempo will NOT retain a copy of this documentation.

IMPORTANT: consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

Tempo Telecom, LLC is an Eligible Telecommunications Carrier (ETC), doing business as Tempo.

EXHIBIT 8



Lifeline Subscriber Name

Address 1

Address 2

City, State, ZIP

Month, Day, Year

Time to Recertify!

In order to keep your lifeline discounts on your phone service, you must complete the recertification form and provide your benefit documentation by *April 22, 2013*.

We value your business! The Federal Government requires Tempo to recertify your eligibility once a year in order for you to continue receiving your lifeline discount. In order to continue receiving your discount you must recertify by **April 22, 2013**.

To recertify please complete the attached recertification form, and provide your documentation of income or government program eligibility. You can provide your documentation to Tempo in many ways:

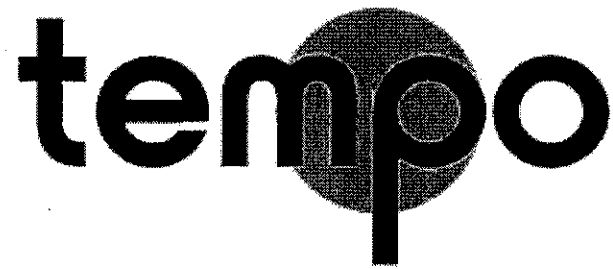
- Fax the completed form to (877) 465-0545.
- Scan and e-mail the completed form to lifeline@mytempo.com.
- Take a picture of the completed form with your mobile phone and text the photo to (816) 446-3388.

We very much value your business. If you have any questions, or there is anything we can do for you, please call us at (866) 580-8411.

Thank you,

A handwritten signature in black ink that reads "Darrell Freelon". The signature is stylized with a large initial "D" and a long, sweeping underline.

Darrell Freelon
Tempo Telesales Manager



Lifeline Enrollment And Recertification Form

Three Easy Steps to Complete:

Step #1 – Complete Lifeline Enrollment Form on page 3

Step #2 – Locate your Lifeline Benefit Documentation
(More info on your required documentation on pages 4 and 5)

**Step #3 – Send completed Lifeline Enrollment Form and Lifeline
Benefit Documentation to Tempo**
(There are many convenient ways to send them, check Page 4)



Lifeline Enrollment/Recertification Form

Account #: _____

This signed application is required to enroll you in the Lifeline program in your state. This application is only for the purpose of verifying your participation in these programs and will not be used for any other purpose.

Things to know about the Lifeline Program:

- Lifeline is a Federal benefit that is not transferrable to any other person;
- Lifeline service is available for only one line per household. A household cannot receive benefits from multiple providers. Not all Lifeline services are marketed under the name Lifeline, and may be offered under other names;
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals living at the same address that share income and expenses; and,
- Violation of the one-per household rule is not permitted under federal rules and will result in the subscriber's de-enrollment from the program and possible criminal prosecution by the U.S. Government.

First Name: _____ MI: _____ Last Name: _____ Date of Birth: _____

Last Four Digits of Social Security Number: _____ Contact Telephone Number: _____

Residential Address: _____ Must be a street address (not a P.O. Box) and your principal residence.
Billing Address: _____ * Check here if the billing address is the same as the residential address.
May contain a P.O. Box.

Address Line 1: _____ Address Line 1: _____

Address Line 2: _____ Address Line 2: _____

City, State and Zip: _____ City, State and Zip: _____

This Address Is: * Permanent * Temporary (if temporary, your address must be certified or updated every 90 days.)
* A shared, multi-household residence (Complete Household Worksheet) → If shared, multi-household residence, I hereby certify that other household adults do not contribute income and/or share expenses in my household. Complete Household Worksheet.
(Initial) _____

_____ I hereby certify that I qualify to participate in at least one of the following programs (check all that apply):
(Initial) Please see the related documentation requirements on the reverse side.

- Supplemental Nutrition Assistance Program (SNAP) formerly known as Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA) or Section 8
- Low Income Home Energy Assistance Program (LIHEAP)
- National School Lunch Program's free lunch program
- Temporary Assistance for Needy Families (TANF)
- Medicaid

_____ I hereby certify that my household income is at or below 135% of the Federal Poverty Guidelines; there are _____ members in my household.
(initial) Please see the Federal Poverty Guidelines and the related documentation requirements on the reverse side.

I certify, under penalty of perjury: (Initial by Each Certification)

The information provided in this application is true and correct to the best of my knowledge; I acknowledge that willfully providing false or fraudulent information in order to receive Lifeline service is punishable by fine or imprisonment, termination of all Lifeline benefits, and being barred from participating in the Lifeline program.

_____ I acknowledge that non-usage over a consecutive 60-day period will result in my de-enrollment from this Lifeline service.

_____ I am eligible for Lifeline service through participation in the qualifying program(s) or meeting the income requirements as identified above.

_____ I have provided documentation of eligibility for Lifeline service, unless otherwise specifically exempted from providing such documentation.

I will inform Tempo within 30 days of any potential change in eligibility, including, but not limited to: (i) a move or change of address; (ii) any change in participation in the programs identified above or change in income or household members; (iii) receiving Lifeline service from another provider; or (iv) any other change that would affect my eligibility for Lifeline service. If I fail to inform Tempo of any of these changes, I understand under penalty of perjury, I may be subject to penalties.

_____ I have provided the address where I currently reside and, if a temporary address has been provided, then I acknowledge that Tempo will attempt to verify my address every 90 days, and, if I do not respond to verification attempts within 30 days, then I may be de-enrolled from my Lifeline benefits.

_____ My household will receive only one Lifeline benefit and, to the best of my knowledge, no one in my household is currently receiving Lifeline service from any other provider.

_____ I acknowledge that I will be required to annually re-certify eligibility and may be required to re-certify continued eligibility for Lifeline at any time and failure to re-certify will result in the termination of Lifeline benefits or other penalties.

_____ I authorize Tempo and its agents to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Lifeline service. I authorize government agencies and their authorized representatives to discuss with and/or provide information to Tempo and its agents verifying my participation in public assistance programs that qualify me for Lifeline service.

_____ I acknowledge and consent to my name, telephone number, and address being divulged to the Universal Service Administrative Company (USAC) (the administrator of the program) and/or its agents for the purpose of maintaining the information in a database and verifying that I, as a subscriber, do not receive more than one Lifeline benefit. In the event that USAC identifies that I am receiving more than one Lifeline subsidy for my household, all carriers involved may be notified so that I may select one service and be de-enrolled from the other.

APPLICANT SIGNATURE/TPV ID: _____ DATE: _____

FOR TEMPO OFFICE USE ONLY

Account #: _____ **TPV ID:** _____

Company Representative Name: _____ • Database Queried? Date: ___/___/___ Database Name: _____

• ETC Eligibility Review Confirmation Type: Written, attached • Screenshot, attached • ETC employee

Type of Documentation: • Benefits Card • Award Letter • Voucher • State Agency Queried? Date: ___/___/___ Agency Name: _____

• Income Statement • Other _____ Agency contact: _____ Confirmation Type: • Notice, attached

How received: • In person • Fax • Email • Text Photo • Mail

Date/Expiration Date of Documentation: ___/___/___

Describe Documentation: _____ Name on Documentation: _____

Date reviewed: ___/___/___

• Applicant name different than name on documentation (Note relationship to applicant: _____)

Applicant Name: _____

_____ Certification that individual is part of applicant's household (MUST certify with applicant in-person or verbally)

_____ Certification that individual is does not already receive Lifeline (MUST certify with applicant in-person or verbally)

Representative Signature: _____ Date: _____

NOTES : _____

HOW TO SUBMIT YOUR ENROLLMENT APPLICATION:

FAX: (877) 465-0545 **EMAIL:** lifeline@mytempo.com **POSTAL MAIL :** Tempo, 2300 Main St., Suite 340, Kansas City, MO 64108.

HOW TO SUBMIT YOUR DOCUMENTATION:

TEXT A DOCUMENT: (816) 446-3388 **FAX:** (877) 465-0545 **EMAIL:** lifeline@mytempo.com **POSTAL MAIL:** Tempo, 2300 Main St., Suite 340, Kansas City, MO 64108.

DOCUMENTATION REQUIREMENTS

You are required to provide proof of your participation in the programs you identified OR proof of your qualifying income.

PROGRAM ELIGIBILITY

If, on page 3 of this form, you indicated you were in a qualifying program, you must provide documentation to prove receipt of benefits under these programs to Tempo. Upon examination by Tempo, any copies, photos or faxes of your documentation will be destroyed or returned to you at your request. Acceptable forms of documentation are described below:

Public Housing Assistance (FPHA) or Section 8

There are two types of documentation that can prove receipt of benefits under the Public Housing Assistance (FPHA), or Section 8, Program.

First, an applicant can provide an award letter. A recipient of Public Housing Assistance (FPHA), or Section 8, receives an award letter from his or her local Public Housing Agency (PHA). The award letter should include the following information: name of program, date of award, name of beneficiary and award amount.

Second, an applicant can provide either a Public Housing Assistance Lease Agreement or a Section 8 Voucher. These items should clearly reflect the type of Public Housing Assistance credit issued.

If the beneficiary does not have an award letter, lease agreement, or voucher, the applicant can contact the agency that approved the application and request formal documentation of his or her award. To find contact information for a local Public Housing Agency, please visit the U.S. Department of Housing and Urban Development's state contact and agency listing.

The beneficiary named on the FPHA documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, Tempo must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Low Income Home Energy Assistance Program (LIHEAP)

Because the Low Income Home Energy Assistance Program (LIHEAP) is administered by a wide range of local agencies, the program's name may vary by state (note that most include the words "energy assistance program" in the name).

There are two types of documentation applicants can provide to demonstrate receipt of LIHEAP benefits.

First, a LIHEAP participant might have an award letter from a state agency. The award letter will include the following: name of program, date of award, name of beneficiary and award amount. In some instances, if the beneficiary received notification of his or her approval in-person, the awardee might not have a formal award letter and will need to contact the state agency that approved the application to request a formal award letter.

Second, a LIHEAP participant can provide a utility bill that reflects the Housing Assistance credit. The utility bill should clearly reflect inclusion of an Energy Assistance credit.

The beneficiary named on the LIHEAP documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline. To find contact information for a local LIHEAP agency, please visit the Low Income Home Energy Assistance Program's [state contact and agency listing](#).

National School Lunch Program's Free Lunch Program (NSLP)

Although the National School Lunch Program's Free Lunch Program (NSLFP) is a federally assisted program, award letters are provided by state agencies and, thus, will vary by locality. All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary and date of award. The beneficiary named on the NSLP documentation may be a dependent of the Lifeline applicant, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Supplemental Security Income (SSI)

Participation in the federal portion of SSI is an eligibility criterion for Lifeline. Some states offer state supplements to the federal SSI program, but receipt of benefits from the state supplement, but not federal SSI, does not qualify an individual for Lifeline. All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary, date of award and award amount. A benefit check stub from the Social Security Administration may also be submitted as proof of participation, if the check stub clearly states the date and name of the beneficiary.

The beneficiary named on the SSI documentation may be a dependent of the Lifeline applicant, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Temporary Assistance for Needy Families (TANF)

All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary and date of award.

The beneficiary named on the TANF documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

In some states, TANF might be more commonly referred to by a different name. Look for your state on this list of [TANF program names by state](#).

Supplemental Nutrition Assistance Program (SNAP)

The Supplemental Nutrition Assistance Program (SNAP) was previously known as Food Stamps. Beneficiary cards and award letters may vary because SNAP is administered on a state level. Because not all beneficiary cards include the recipient's name, it is recommended that an award letter from the local state agency be used for Lifeline verification purposes. All award letters should contain the following basic information: name of program, name of beneficiary, address of beneficiary and date of award.

The beneficiary named on the SNAP documentation may be a member of the Lifeline applicant's household, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

In some states, SNAP might be more commonly referred to by a different name. Look for your state on this list of [SNAP program names by state](#).

Medicaid

Each state provides its own unique Medicaid card to beneficiaries. However, most cards should clearly state the following: name of program, name of beneficiary, state of residence, issued or effective date and the name of the state agency that provided the card.

The beneficiary named on the Medicaid documentation may be a dependent of the Lifeline applicant, rather than the applicant. If the name of the beneficiary on the documentation provided does not match the name of the Lifeline applicant, the ETC must record the name of the beneficiary and confirm by receiving certification from the applicant that the named beneficiary is a member of his or her household, and that this individual does not receive Lifeline.

Some states have different names for their Medicaid programs. Look for your state on this list of [Medicaid program names by state](#).

PROGRAM ELIGIBILITY

An applicant may be eligible for Lifeline if he or she has a household income at or below 135% of the Federal Poverty Guidelines. Below are the acceptable types of documentation:

- The prior year's state, federal, or Tribal tax return
- A current income statement from an employer or paycheck stub
- A Social Security statement of benefits
- A Veterans Administration statement of benefits
- A retirement or pension statement of benefits
- An Unemployment or Workers' Compensation statement of benefits
- A federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support award, or other official document containing income information
- If the documentation relied on does not cover a full year, such as a current pay stub, the subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.

135% FEDERAL POVERTY GUIDELINES - 2013	
Members of Household	Household Income must be at or below
1	\$ 15,512
2	\$ 20,939
3	\$ 26,366
4	\$ 31,793
5	\$ 37,220
6	\$ 42,647
7	\$ 48,074
8	\$ 53,501
For every additional member of your household, add \$5,427.	

Upon examination by Tempo, any copies, photos or faxes of your documentation will be destroyed or returned to you at your request.