



Public Service Commission

State of North Dakota

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July 3, 2013

Wade C. Mann
Crowley Fleck
400 East Broadway, Suite 600
P.O. Box 2798
Bismarck, ND 58502-2798

Re: Telrite Corporation d/b/a Life Wireless
Case No. PU-13-51
Your File No. 90-559-001

Dear Mr. Mann

The North Dakota Public Service Commission held three work sessions, on May 9, June 5, and June 26, 2013, to discuss Telrite's application for designation as a Lifeline-only eligible telecommunications carrier (ETC). The Commission concluded that Telrite should provide additional information and should certify to certain future action, both for the record in this case. The Commission intends to consider the information before a making decision regarding Telrite's application.

If Telrite does not agree that the information in its responses should be part of the record, or wishes to provide additional information or testimony, or cross examine a witness regarding this information, Telrite should make a written request to the commission for a formal hearing on the application. Further, if Telrite believes that there would be a benefit to discussing any of these questions, Telrite's responses, or the requested certification in an informal or formal hearing, please let us know at your earliest convenience.

Please have Telrite respond to the questions below within 10 business days of receipt of this letter.

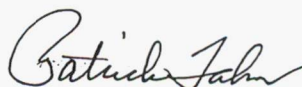
1. Provide all Lifeline audits and reviews the Federal Communications Commission (FCC), the Universal Service Administrative Company (USAC) and any other state commission, Lifeline administrator or any other government agency has conducted on Telrite's Lifeline program since the beginning of 2011. The requested documents should include formal audits and limited reviews such as in-depth data validations and Payment Quality Assurance (PQA) reviews.

2. Provide Telrite's 2013 recertification report provided to the FCC and USAC. If the Company has not yet prepared a 2013 recertification report, please provide the 2012 report and the date the Company expects to submit the 2013 report.
3. If the FCC has issued any citations to individuals receiving duplicate lifeline support from Telrite and other Lifeline providers, what processes and procedures has Telrite undertaken to prevent duplicate lifeline support going forward? If applicable, please also provide copies of these processes and procedures as well as the number of citations issued.
4. Please describe the specific procedures Telrite has in place to prevent waste, fraud and abuse in the Lifeline program. Include in this response copies of employee training manuals, processes and procedures as well as a discussion of the data bases that Telrite uses. In describing the data bases, please specifically identify what data Telrite believes specifically helps prevent waste, fraud and abuse.
5. Would Telrite be willing to request Lifeline participants waive any right to privacy in order that Telrite could periodically provide a list of customers to the Commission?
6. If Telrite's lifeline program has been the subject of any state or federal investigations, please provide information on the outcome of these investigations. Did any of the investigations result in Telrite paying fines and implementing any changes in its processes and procedures to ensure the mistakes that led to the investigation would not reoccur? If so, please specifically discuss the changes and the amount of any fines.

In addition to your responses to the questions above, please have Telrite complete and sign the enclosed Certification or let us know if Telrite has any specific objection to the Certification.

If you have any questions please call me at 701-328-4077 or e-mail to pfahn@nd.gov.

Best regards,



Patrick Fahn
Director, Compliance and Competitive Markets

Enclosure

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Telrite Corporation
Eligible Telecommunications Carrier
Application

Case No. PU-13-51

CERTIFICATION

I am _____, a representative of Telrite Corporation (Telrite) with authority to bind Telrite and I certify that:

1. Telrite understands and agrees to the conditions and criteria set forth in Chapter 49-21 of the North Dakota Century Code and Chapter 69-09-05 of the North Dakota Administrative Code that pertain to Wireless Lifeline Only Eligible Telecommunications Carriers (ETC), and that Telrite will be responsible for compliance with this Certification, the Public Service Commission's order designating Telrite as an ETC, and conditions and criteria set forth in the applicable federal and state laws and rules pertaining to Eligible Telecommunications Carriers offering Lifeline Only services.
2. Telrite agrees to comply with all statements, processes and procedures set forth in its Application for designation as an ETC in the non-rural and rural wire centers in North Dakota identified in its Application. Telrite agrees that all statements made and matters set forth in its Application are true and correct to the best of Telrite's knowledge, information, and belief.
3. Telrite will use the federal low-income universal service support it receives only for the provision of services for which the support is intended.
4. Telrite meets all of the prerequisites to be designated as an ETC throughout its proposed ETC Designated Area in the state of North Dakota.
5. Telrite provides each of the services supported by federal universal service support mechanisms, specified in Federal Communications Commission's (FCC's) rules, 47 C.F.R. § 54.101, and will offer these supported services in North Dakota upon designation as an ETC, including voice grade access, minutes of use for local service at no additional charge, access to emergency services and toll limitation services.
6. Telrite will provide the supported services on a timely basis to requesting customers within Telrite's designated service area where Telrite's underlying carriers' network exists.

7. Telrite will provide service within a reasonable period of time, if the potential customer is within the applicant's proposed designated service area but outside its existing network coverage, if service can be provided at reasonable cost by:
 - (a) Modifying or replacing the requesting customer's equipment;
 - (d) Adjusting network or customer facilities; or
 - (e) Reselling services from another carrier's facilities to provide service.
8. Telrite is not seeking Universal Service Fund high-cost support as part of its Application.
9. Telrite will use all available means to ensure customers are eligible for the Lifeline program at the time of sign-up and recertification in accordance with the federal default eligibility criteria in 47 C.F.R. § 54.409(2) and the relevant proof documentation specified in 47 C. F. R. § 54.410. Telrite will check all available data bases including the FCC's National Accountability Database and the National Lifeline Eligibility Database when fully functional to prevent duplication and determine eligibility.
10. Telrite has taken, and will continue to take, steps to work with its underlying carriers to remain functional in emergency situations by: (1) maintaining a reasonable amount of backup power to ensure functionality without an external power source; (2) maintaining the ability to re-route traffic around damaged facilities and to manage traffic spikes resulting from emergency situations; and (3) establishing procedures for employees to follow in an emergency to prevent or minimize interruption or impairment of telecommunications services.
11. Telrite will meet or exceed applicable consumer protection and quality standards and will comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.
12. Telrite will advertise the availability of the supported services detailed in its Application, and the corresponding rates and charges, in a manner designed to inform the general public within North Dakota. This advertising will occur through a combination of media channels, such as television and radio, newspaper, magazine and other print advertisements, outdoor advertising, direct marketing, and the Internet.
13. Telrite will offer the services described in its Application.
14. Telrite understands and agrees that if Telrite has not advertised its Lifeline services or signed up any North Dakota customers within 12 months of the effective date of Telrite's designation as a Lifeline-only ETC, the Public Service Commission may revoke Telrite's ETC designation and Telrite may reapply to be designated as a Lifeline-only ETC in North Dakota.

15. Telrite understands and agrees that it may be required by the FCC to provide equal access to long distance carriers in the event that no other ETC provides equal access within Telrite's designated ETC service area.
16. Telrite will comply with all applicable annual reporting requirements associated with being an ETC in North Dakota including filing with the Public Service Commission a copy of each report filed with the FCC, within 30 days of filing with the FCC.
17. Telrite will file at least annually or more often if requested by the Public Service Commission, a complete list of its customers and waivers, including North Dakota Department of Human Services' Form SFN 1059, Authorization for Release of Information 449-55-05, for each customer on the list.
18. Telrite understands and agrees that its ability to offer service is subject to suspension or revocation for failure to comply with the Public Service Commission's orders, or applicable statutes, rules, regulations, standards, and other authorizations.
19. Telrite agrees to maintain the records to demonstrate that Telrite has complied with the requirements of the Public Service Commission's order(s) and that Telrite will preserve records demonstrating compliance for Public Service Commission inspection at any reasonable time upon reasonable notice.
20. Telrite understands and agrees that, to the extent there are any conflicts or inconsistencies between Telrite's Application and the provisions in this Certification, the Certification provisions control.

Dated this ____ day of _____, 201.

TELRITE CORPORATION

By _____

Its _____