

ASSURANCE WIRELESS LIFELINE PROGRAM

April 12, 2024





LIFELINE PROGRAM

Overview | Industry leader in closing the Digital Divide, offering Lifeline services and devices to qualifying low-income households through different points of distribution

OUR CUSTOMERS



- T-Mobile helps connect underserved, vulnerable populations to their world
- Customers must qualify to get service through the Lifeline program
 - One per eligible household
- The Lifeline Program is an FCC benefit program that helps ensure that households can afford the wireless service they need for work, school, healthcare and more.
- Eligible low-income households, or those on public assistance/benefits (SNAP, WIC, Medicaid, SSI, etc)

BRAND POWER



- Serving the community since 2009
- Industry Leader
- Nationwide T-Mobile Network (owned)
- Free or paid service - LL program
- We have (2) channels for distribution
 - Feet on the Street
 - AW Website (Digital)
- Free Plan:
 - 1,000 Voice Minutes
 - Unlimited Text
 - 4.5G Data
- Paid Plan: Coming Soon

ACP WINDOW



- Full benefit thru EOM May
- Bundled Customers Fall Back will be their Lifeline program
- ACP Paid Service will continue thru end on annual term
- ACP Only Customers – Apply of Lifeline Program
 - <https://www.assurancewireless.com/>
- June – August: Continue to provide ACP benefits

LIFELINE PROGRAM

How to qualify:

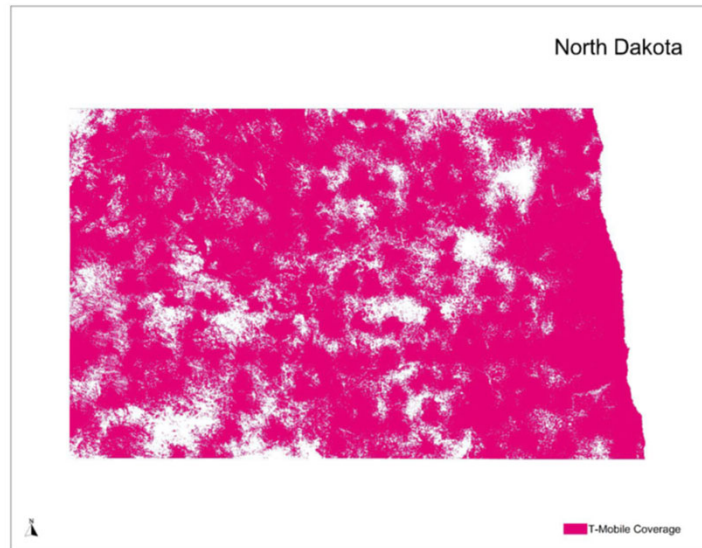
A household is eligible if a member of the household meets at least **one** of the criteria below:

- ✓ Has an income that qualifies:
 - ✓ Lifeline - 135% of the Federal Poverty Guidelines
- ✓ Participates in any Lifeline through any of the following assistance programs: SNAP (Food Stamps), Medicaid, Federal Public Housing Assistance, Veterans Pension and Survivors Benefit, and Supplemental Security Income (SSI);
- ✓ Participates in Tribal specific programs, such as Bureau of Indian Affairs General Assistance, Tribal TANF, or Food Distribution Program on Indian Reservations;
- ✓ Qualify through your Child or Dependent

T[®] LIFELINE PROGRAM

Assurance Wireless customers will have access to a robust 5G network

- Assurance Wireless is facilities-based provider for ETC purposes as a member of the T-Mobile corporate family
- Assurance Wireless' proposed designated service area is set forth in Exhibit 3; the ILEC wire center list is set forth in Exhibit 4



- Assurance Lifeline offers eligible customers various devices for free.



LIFELINE PROGRAM

Proposed Changes to North Dakota Certification

Standard: 1. Assurance is seeking designation as a Lifeline-Only Eligible Telecommunications Carrier (Lifeline-Only ETC) for all non-rural telephone company wire centers within the state of North Dakota, all rural telephone company study areas within the state of North Dakota, and all Tribal areas within the non-rural and rural telephone company areas within the state of North Dakota. Which is the entire state of North Dakota.

Proposed: 1. Assurance is seeking designation as a Lifeline-Only Eligible Telecommunications Carrier (Lifeline-Only ETC) for the coverage area designated in Exhibit 3, which may or may not exactly coincide with some or all rural incumbent telephone company wire centers within the state of North Dakota, exclusive of Tribal areas.

Why: Assurance Wireless is proposing to be designated as a Lifeline provider where it has wireless coverage in North Dakota, exclusive of Tribal areas. The FCC has forborne from applying the “service area” requirement for wireless Lifeline providers. See In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform, WC Docket Nos. 09-197 and 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013), ¶ 11

** Conforming changes also proposed for paragraphs 2 and 3 (*i.e.*, eliminate reference to enumerated telephone exchanges and replace with “proposed designated coverage area”)



LIFELINE PROGRAM

Proposed Changes to North Dakota Certification

Designating Assurance Wireless as an ETC by matching its wireless coverage area rather than by naming wire centers has been done in other states, including the most recent designations in Vermont and Wyoming:

- In the Matter of the Application of Assurance Wireless USA, L.P. for Designation as an Eligible Telecommunications Carrier, Docket No. 62077-1-RA-24 (Record No. 17484), Order Granting Designation (rel. March 11, 2024), ¶ 5 (“Assurance requests designation as an ETC within the wireless coverage service area identified in Exhibit 3 of its Application, excluding Tribal lands.”);
- Petition of Assurance Wireless USA, L.P. for designation as an Eligible Telecommunications Carrier in the State of Vermont, Case No. 24-0147-PET, Final Order Approving Designation as an Eligible Telecommunications Carrier (rel. March 21, 2024), p. 8 (“The Commission designates Assurance Wireless ...[as a Lifeline-only ETC] with a service area in all areas of Vermont that are coextensive with its underlying carrier’s service areas as identified in Exhibit 3.”).



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Standard: 6. *** including voice grade access, minutes of use for local service at no additional charge, access to emergency services and toll limitation services.

Proposed: 6. ***including voice grade access, minutes of use for no additional charge, access to emergency services and toll limitation services.

Why: Assurance minutes can be used for any domestic call.

Standard: 7. Assurance will provide service on a timely basis to requesting customers within the applicant's proposed designated service area where the applicant's network already passes by the potential customer's premises.

Proposed: 7. Assurance will provide service on a timely basis to requesting customers within the applicant's proposed designated service area.

Why: Wireless networks don't "pass by" a premise. The "standard" rep, as written, is relevant to a wireline high-cost provider that has facilities in place to serve a premise that it "passes."



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Standard: 8. Assurance will provide service within a reasonable period of time, if the potential customer is within Assurance’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.

Proposed: 8. Assurance will provide service within a reasonable period of time if the potential customer is within Assurance’s proposed designated service area.

Why: Assurance is proposing that its designated Lifeline service area match its existing wireless coverage area.

- Other than the wireless handset, there is no customer equipment to change out, and changing handsets won’t affect whether customer can use Assurance’s Lifeline service;
- There are no customer facilities to “adjust.” Adjusting network facilities could negatively impact coverage for other wireless customers served by the T-Mobile network;
- Assurance does not resell wireless services provided by other wireless network providers.



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Proposed Changes to North Dakota Certification

Standard: 10. *** Assurance will check **all available databases including** the National Lifeline Accountability Database to prevent duplication and determine eligibility.

Proposed: 10. *** Assurance will check the National Lifeline Accountability Database to prevent duplication and determine eligibility.

Why: If a state does not have its own Lifeline database, the NLAD is the only database required to verify eligibility.

Standard: 11. Assurance has taken, and will continue to take, steps to **work with its underlying carriers to** remain functional in emergency situations by...

Proposed: 11. Assurance has taken, and will continue to take, steps to remain functional in emergency situations by...

Why: Assurance does not use “underlying carriers.” As a member of the T-Mobile family, Assurance Wireless is deemed a facilities-based carrier.



LIFELINE PROGRAM

Proposed Changes to North Dakota Certification

Standard: 16. ***including filing with the Public Service Commission a copy of each report filed with the FCC, within 30 days of filing with the FCC.

Proposed: 16. ***including filing with the Public Service Commission a copy of the Form 555 and 481 for North Dakota filed with the FCC, within 30 days of filing with the FCC.

Why: Assurance files reports with the FCC for over 40 jurisdictions. Presumably, the commission is only interested in Lifeline reports filed at the FCC for North Dakota.

Standard: 18. Assurance agrees to maintain the records to demonstrate that Assurance has complied with the requirements of the Public Service Commission's order(s) and that Assurance will preserve records demonstrating compliance for Public Service Commission inspection at any reasonable time upon reasonable notice.

Proposed: 18. Assurance agrees to maintain the records to demonstrate that Assurance has complied with the requirements of the Public Service Commission's order(s) and that Assurance will preserve records for three years demonstrating compliance for Public Service Commission inspection at any reasonable time upon reasonable notice.

Why: The federal Lifeline recordkeeping requirement is three years. 47 CFR § 54.417. Assurance Wireless proposes the same record retention period to maintain consistency in record keeping obligations.

