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July 2, 2024

VIA OVERNIGHT DELIVERY

Executive Secretary
Public Service Commission
State Capitol
600 E. Boulevard Ave., Suite 408
Bismarck, ND 58505-0480
(701) 328-2400

Re: Global Connection Inc. of America d/b/a StandUp Wireless

Dear Sir/Madam:

Enclosed please find one original and seven (7) copies of Global Connection Inc. of America d/b/a StandUp Wireless' Application for Designation as an Eligible Telecommunications Carrier in the State of North Dakota.

I have enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed preaddressed-postage-prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,



Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
*Attorneys for Global Connection Inc. of America d/b/a
StandUp Wireless*

Enclosures

**BEFORE THE
STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

In the Matter of)	
)	Case No. PU 24 _____
Application of)	
GLOBAL CONNECTION INC. OF)	
AMERICA D/B/A STANDUP WIRELESS)	
)	
for Designation as an Eligible)	
Telecommunications Carrier)	
)	

APPLICATION

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STANDUP seeks ETC designation solely to provide Lifeline service to qualifying North Dakota consumers; it will not (and is not eligible to) seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of participating in the Link-Up program or high cost program.⁴ As demonstrated herein, and as certified in Exhibit 1 attached hereto, STANDUP meets all the statutory and regulatory requirements for designation as an ETC in the State of North Dakota, including the requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*,⁵ *Lifeline Modernization Order*,⁶ and *Fifth Report and Order*.⁷ Furthermore, STANDUP is positioned to reach unserved and underserved Lifeline-eligible consumers. Rapid grant of STANDUP’s request, therefore, would advance the public interest because it would enable the Company to commence much needed Lifeline services to a wide array of low-income North Dakota residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve this Application.

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

⁵ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline and Link Up Reform Order*”).

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, “*Third Report and Order*” or “*Lifeline Modernization Order*”).

⁷ *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 17-287, WC Docket No. 11-42, WC Docket No. 09-197, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (rel. Nov. 14, 2019) (hereinafter, “*Fifth Report and Order*”).

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

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II. COMPANY OVERVIEW

Global Connection Inc. of America d/b/a StandUp Wireless is a Georgia Corporation,⁸ with its principal office located at 390 NE 191st Street, Ste. 8334, Miami, Florida 33179. STANDUP is owned twenty-five per cent (25%) by Global Connection Holdings Corporation (“Global Holdings”) and seventy-five per cent (75%) by Odin Mobile, LLC (“Odin Mobile”). Global Holdings and Odin Mobile both operate as holding companies and do not provide telecommunications services.

STANDUP is a provider of commercial mobile radio service (“CMRS”) and provides prepaid wireless telecommunications services to consumers by using the underlying wireless network of T-Mobile USA, Inc. (“T-Mobile” or its “Underlying Carrier”) on a wholesale basis. STANDUP is currently designated as an ETC in the following jurisdictions: Alabama, Arkansas, Arizona, California, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, New York, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Tennessee,

⁸ Global Connection Inc. of America was incorporated in the State of Georgia on June 1, 1998.

Texas, Utah, Virginia, Washington, Wisconsin and West Virginia. STANDUP also provided prepaid wireless telecommunications services throughout the United States through the FCC's Affordable Connectivity Program ("ACP").

STANDUP will provide affordable prepaid mobile phone service and high quality customer service. STANDUP's service offering will include: (1) local and long distance calling; (2) access to the following custom calling features at no charge: (a) Caller ID; (b) Call Waiting; (c) Call Forwarding; (d) 3-Way Calling; and (e) Voicemail; (3) text messaging; (4) broadband access; and (5) the option for a consumer to "bring their own device". STANDUP may provide user-friendly handsets or hotspot devices. STANDUP's products and plans will be specially geared toward serving lower income communities. The Company will not require service contracts from its customers and it will always ensure competitively low pricing for its services and products. STANDUP will manage all aspects of the customer experience, including setting service pricing, handset selection, marketing materials, and customer service. The Company's prepaid, budget-friendly pricing will give many low-income consumers the option of having mobile phone service and broadband access without the burden of hidden costs, varying monthly charges, or contractual commitments. Customers will be able to customize their STANDUP service to suit their needs with STANDUP's available bundles of minutes, broadband data, and text packages to supplement their monthly plan.

STANDUP's Lifeline customers will be low-income consumer households that will depend on, and benefit greatly from, STANDUP's inexpensive and flexible pricing plans. STANDUP will not impose credit checks, nor will it require any deposits or contractual commitments. Many of STANDUP's customers likely will turn to STANDUP because they cannot afford the postpaid services provided by traditional wireless carriers. STANDUP will affirmatively reach out to the

low-income sector of the consumer base to offer attractive and affordable communications options. As such, STANDUP will contribute to the expansion of mobile wireless and broadband services for low-income consumers in North Dakota.

III. THE COMMISSION HAS JURISDICTION OVER DESIGNATION OF WIRELESS ETCs

Section 214(e)(2) of the Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.⁹ Although Section 332(c)(3)(A) of the Act prohibits states from regulating the entry of or the rates charged by any provider of commercial mobile service or any private mobile service, this prohibition does not allow states to deny wireless carriers ETC status.¹⁰ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). STANDUP therefore requests that the Commission expeditiously process the instant Application so that STANDUP can quickly begin expanding the availability of affordable Lifeline-supported wireless services to qualifying low-income customers in North Dakota.

STANDUP recognizes that Section 214(e)(1)(A) of the Act states that ETCs shall offer services, at least in part, over their own facilities and that Section 54.201(i) of the FCC’s Rules (47 C.F.R. § 54.201(i)) prohibits state commissions from designating as an ETC a telecommunications carrier that offers services exclusively through the resale of another carrier’s services. However, the FCC has granted forbearance from enforcement of this facilities requirement to carriers seeking Lifeline-only ETC designation.¹¹ Section 10(e) of the Act (47 U.S.C. § 160(e)) provides: “[a]

⁹ 47 U.S.C. § 214(e)(2).

¹⁰ *USF Order*, at 8858–59, ¶ 145.

¹¹ *See Lifeline and Link Up Reform Order* at ¶ 368.

State commission may not continue to apply or enforce any provision of this chapter that the [Federal Communications] Commission has determined to forbear from applying under subsection (a) of this section.” As such, the Commission is required by Section 10(e) to act in accordance with the FCC’s grant of forbearance, and therefore, may not apply the facilities-based requirement to STANDUP. Therefore, the Commission has the authority under Section 214(e)(2) of the Act to grant STANDUP’s request for designation as an ETC throughout the State of North Dakota.

IV. STANDUP SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC UNDER 47 C.F.R. § 54.201

Section 254(e) of the Act provides that, “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireless ETCs.¹² Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that shall, throughout the designated service area, offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services, except where the FCC has forborne from the “own facilities” requirement. Applicants also must commit to advertise the availability and rates of such services.¹³ As detailed below, STANDUP satisfies each of the above-listed requirements.

¹² See *Federal-State Joint Board on Universal Service, First Report and Order*, 12 FCC Rcd 8776, 8858-59, ¶ 145 (1997) (“USF Order”).

¹³ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

A. STANDUP Will Provide Service Consistent with the FCC’s Grant of Forbearance from Section 214’s Facilities Requirements

Although Section 214 requires ETCs to provide services using their facilities, at least in part, the FCC has forbore from that requirement with respect to carriers such as STANDUP. In the *Lifeline and Link Up Reform Order*, the FCC granted forbearance from the “own-facilities” requirement contained in Section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions:¹⁴

(1) the carrier must comply with certain 911 requirements [(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services; and (c) complying with conditions (a) and (b) starting on the effective date of this Order]; and

(2) the carrier must file, and the Bureau must approve, 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 this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.

In accordance with the *Lifeline and Link Up Reform Order*, STANDUP filed a Compliance Plan with the FCC, which the FCC approved on May 25, 2012.¹⁵ A copy of STANDUP’s FCC-approved revised Compliance Plan is attached hereto as Exhibit 2.¹⁶ STANDUP commits to providing Lifeline service in North Dakota in accordance with its FCC-approved Compliance Plan, as amended, and in compliance with applicable state and federal regulations, to the extent amendments thereto may supersede commitments made in the Compliance Plan.

¹⁴ See *Lifeline and Link Up Reform Order* at ¶¶ 368, 373, and 379.

¹⁵ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

¹⁶ See Public Notice DA 18-854 (rel. August 15, 2018).

B. STANDUP Is a Common Carrier

CMRS providers like STANDUP are treated as common carriers.¹⁷

C. STANDUP Will Provide All Supported Services

Through its Underlying Carrier, STANDUP is able to provide all of the supported services required by Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) as follows:

1. Voice Telephony Service

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

Voice Grade Access to the Public Switched Telephone Network. STANDUP provides voice grade access to the public switched telephone network ("PSTN") through the purchase of wholesale CMRS services from its Underlying Carrier.

Local Usage At No Additional Charge. STANDUP offers rate plans that provide its customers with minutes of use for local service at no additional charge.

Access to Emergency Services. STANDUP provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or E911 systems. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. STANDUP also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

¹⁷ *Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, Second Report and Order, 9 FCC Rcd 1411, 1425 ¶ 37, 1454-55 ¶ 102 (1994) (wireless resellers are included in the statutory "mobile services" category, and providers of cellular service are common carriers and CMRS providers); 47 U.S.C. § 332(c)(1)(A) ("mobile services" providers are common carriers); *see also PCIA Petition for Forbearance for Broadband PCS*, WT Docket No. 98-100, (Memorandum Opinion and Order and Notice of Proposed Rulemaking, 13 FCC Rcd 16857, 16911 ¶ 111 (1998) ("We concluded [in the *Second Report and Order*] that CMRS also includes the following common carrier services: cellular service, ... all mobile telephone services *and resellers of such services.*") (emphasis added).

Toll Limitation. In its *Lifeline and Link Up Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service.¹⁸ “ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.”¹⁹ Nonetheless, STANDUP’s offerings inherently allow Lifeline subscribers to control their usage, as its wireless service is offered on a prepaid, or pay-as-you-go, basis. STANDUP’s service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.

2. Broadband Internet Access Services

STANDUP provides Broadband Internet access service (“BIAS”) to ensure its Lifeline customers receive full Lifeline support. The FCC has stated that BIAS consists of the ability for a user to receive “the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service.”²⁰ STANDUP provides BIAS to low-income consumers via resale of its Underlying Carrier’s services.

D. STANDUP Requests Designation Throughout Its Service Area

STANDUP is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, STANDUP is required to describe the geographic area(s) within which it requests designation as an ETC. STANDUP requests ETC designation that is statewide in scope to allow the Company to provide Lifeline service wherever its underlying, facilities-based providers have wireless coverage, including federally recognized tribal lands and subject to the existence of its Underlying Carriers’ facilities and corresponding coverage, including as it may

¹⁸ See *Lifeline and Link Up Reform Order* at ¶ 367.

¹⁹ See *id.* at ¶ 49.

²⁰ See 47 C.F.R. § 8.2(a).

change going forward. The current coverage is attached hereto as Exhibit 3. STANDUP understands that its service area overlaps with rural carriers in North Dakota, but maintains that the public interest factors described below justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. STANDUP is not eligible for and does not seek Link-Up or high-cost support.

Therefore, designation of STANDUP as an ETC will cause no growth in the high-cost portions of the USF and will not erode high-cost support from any rural telephone company. In fact, the FCC has determined that “[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”²¹ While federal rules (47 U.S.C. §§ 160, 214(e)(5) and 47 C.F.R. § 54.207(b)) require that the service area of an ETC conform to the service area of any rural telephone company serving the same area (the “service area conformance” requirement), the FCC’s *Lifeline and Link Up Reform Memorandum Opinion and Order* (FCC 13-44 released April 15, 2013) authorized forbearance from the service area conformance requirements with respect to carriers seeking to provide Lifeline-only service.²² In light of this forbearance, the Commission has the authority to designate ETCs such as STANDUP in rural areas without concern for the service area conformance requirement.²³

²¹ See *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, Memorandum Opinion and Order*, 16 FCC Rcd 48, 55 (2000).

²² See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket No. 09-197, WC Docket No. 11-42, Memorandum Opinion and Order, FCC 13-44 (rel. April 15, 2013).

²³ See 47 C.F.R. § 54.207(c).

E. STANDUP Will Advertise the Availability of Supported Services

STANDUP will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. § 54.201(d)(2). STANDUP will comply with the FCC's rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, STANDUP's marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) STANDUP is the provider of the services. Moreover, the Lifeline application/certification form will state that Lifeline is a federal benefit and that 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. Additionally, STANDUP will disclose the company name under which it does business and the details of its Lifeline service offerings in any Lifeline-related marketing and advertising.

STANDUP will advertise its services in a manner reasonably designed to reach those likely to qualify for Lifeline service, using mediums for outreach such as the Internet, mass media, outreach events, and community and charitable involvement. STANDUP may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

V. STANDUP SATISFIES THE ADDITIONAL REQUIREMENTS FOR ETC DESIGNATION UNDER 47 C.F.R. § 54.202(a)

STANDUP hereby provides the additional information and certifications required for carriers seeking ETC designation as set forth in 47 C.F.R. § 54.202(a).

A. Service Commitment Throughout the Proposed Designated Service Area

STANDUP will provide service in North Dakota by reselling service which it obtains from its Underlying Carrier. T-Mobile's network is operational and largely built out. Thus, STANDUP will be able to commence offering its Lifeline service to all locations served by T-Mobile very soon after receiving approval from the Commission.

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the certification attached in Exhibit 1, STANDUP commits to comply with the service requirements applicable to the low-income support that it receives, including the rules set forth in the FCC's *Fifth Report and Order*. Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a common carrier seeking designation as a Lifeline-only ETC is not required to submit a five-year network improvement plan as part of its application for designation as an ETC.

B. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. § 54.202(a)(2), STANDUP has the ability to remain functional in emergency situations. As discussed, STANDUP will utilize the extensive and well-established Tier I T-Mobile network and facilities to provide its Lifeline services. The Company understands that T-Mobile's network has access to 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. As a reseller of T-Mobile's services, STANDUP and its customers benefit from this functionality.

C. Commitment to Consumer Protection and Service Quality

In accordance with 47 C.F.R. § 54.202(a)(3), an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards, and wireless applicants may satisfy this requirement with a commitment to comply with the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Service. STANDUP hereby commits to comply with the CTIA Consumer Code for Wireless Service.

STANDUP's customer service is available Monday through Saturday from 8:00AM to 10:00PM EST via phone (611 or toll-free 800-544-4441) and Monday through Saturday from 8:00AM to 9:30PM EST via online chat. Subscribers can also initiate support tickets 24 hours a day 7 days a week via an online chat and customer service representatives respond during the above-mentioned support hours. STANDUP will cooperate fully with the Commission to resolve all consumer complaints.

D. STANDUP is Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), STANDUP is financially and technically capable of providing Lifeline-supported services. STANDUP offered non-Lifeline and Lifeline wireline service from 1998 until 2019, and has been providing non-Lifeline and Lifeline-supported wireless service since April 2011, now offering Lifeline service in thirty-four (34) jurisdictions. The Company generates revenues from non-Lifeline services; consequently, STANDUP has not relied (and does not intend to rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In the event USAC ceases disbursements for a period of time, the Company will still be able to provide service to its customers. In addition, STANDUP's financial and technical capabilities to provide service are demonstrated by its performance of approximately 12 years in the Lifeline industry, with consistently strong service, growth, and robust protections to ensure its

Lifeline customers meet eligibility requirements. STANDUP's financial capability is further bolstered by its access to the considerable financial resources of its affiliates.

Furthermore, the senior management of STANDUP has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to STANDUP.²⁴ STANDUP will be providing resold wireless service, and therefore will also rely upon the managerial and technical expertise of its Underlying Carrier.

E. Terms and Conditions of Proposed Lifeline Offering

STANDUP has the ability to provide all services supported by the universal service program, as detailed in 47 C.F.R. § 54.101(a), throughout North Dakota. STANDUP commits that its Lifeline-supported voice services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated going forward. STANDUP'S Lifeline-supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated going forward. To the extent STANDUP provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and STANDUP will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

Attached hereto as Exhibit 5 is a summary table of the Company's proposed Lifeline service offerings, showing that Lifeline customers will receive 1,000 voice minutes, unlimited text messages, and 4.5 gigabytes (GB) of data per month (unlimited talk and text with 6.5 GB data for Tribal residents) with full access to T-Mobile's 4G LTE network at a net cost of \$0.00 after

²⁴ See Exhibit 4 for key management bios.

application of Lifeline support.²⁵ Customers will be able to purchase additional minutes or data as needed. All plans will include nationwide domestic long-distance at no extra per-minute charge, and STANDUP will not assess any usage for access to its free customer services (611). Emergency (911) calls will be free, regardless of service activation or availability of minutes, and will not count against the customer's airtime. The Company's Lifeline offering will provide feature-rich mobile connectivity for qualifying subscribers without the burden of credit checks or service contracts. STANDUP's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

F. STANDUP Will Comply with the Lifeline Certification and Verification Requirements

Customers interested in obtaining information on the Lifeline program will be directed to a toll-free telephone number and to the Company's website, which will contain information regarding the Company's Lifeline service plans, including a description of the Lifeline program and eligibility criteria. Customers must then apply directly through the National Lifeline Eligibility Verifier ("National Verifier"), which they may do online or by submitting all required documentation to the National Verifier by mail. Customers may download a copy of the application form from the Internet (either from the National Verifier's or Company's website) or request that a copy be mailed to them. STANDUP utilizes the standard Lifeline application forms as required by FCC rules, and thus complies with the disclosure and information collection requirements in 47 C.F.R. § 54.410(d).²⁶ STANDUP will certify and verify initial and continued

²⁵ The current rate plan is based upon the current FCC minimum service standards ("MSS") and may change based on the future MSS.

²⁶ *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline

consumer eligibility in accordance with 47 C.F.R. § 54.410, and will notify the applicant that the prepaid service must be personally activated by the subscriber and the subscriber must use their service every thirty (30) days. STANDUP further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income household pursuant to 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410, 54.404-54.405. Processing of consumers' applications and determination of eligibility will be performed by the National Verifier.

G. Prevention of Waste, Fraud and Abuse

The FCC has taken steps to further curb abuse in the Lifeline program by establishing the National Verifier, which transfers the responsibility of eligibility determination away from Lifeline providers. STANDUP will rely on the National Verifier to determine initial and ongoing eligibility of North Dakota Lifeline subscribers. The National Verifier queries the National Lifeline Accountability Database ("NLAD") for every enrollment to determine whether a prospective subscriber is currently receiving a Lifeline service from STANDUP or any other ETC, and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service. STANDUP thus complies with the requirements of section 54.404 of the FCC's rules. In addition, Company personnel emphasize the "one Lifeline service per household" restriction in their direct sales contacts with potential customers.

Consistent with federal regulations, the Company will not seek USF reimbursement for new subscribers until they have personally activated the service, either by initiation and/or actual

Program," DA 18-161 (rel. Feb. 20, 2018). The standard application/certification forms are available on USAC's website (See USAC, Lifeline Forms, <http://www.usac.org/li/tools/forms/default.aspx>).

use of the service, and will de-enroll any subscriber that has not used the Company's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), STANDUP will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Customers that have been deactivated may participate in the Company's Lifeline service in the future by reapplying and re-establishing eligibility.

To further protect the integrity of the USF, STANDUP contracts with a third party Lifeline service bureau, currently CGM, LLC, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, STANDUP ensures that it does not over-request from support funds.

H. STANDUP Will Comply With Reporting Requirements

STANDUP will provide the Commission a copy of its annual certifications and Lifeline recertification results pursuant to 47 C.F.R. § 54.416 (i.e., FCC Form 555), as well as a copy of its annual report filed pursuant to 47 C.F.R. § 54.422 (i.e., FCC Form 481), and will comply with applicable Commission reporting requirements for Lifeline ETCs i.e. NDAC §69-09-05-12.1.

I. STANDUP Will Comply With Regulations Imposed By The Commission

By this Application, STANDUP hereby asserts its willingness and ability to comply with the rules and regulations that the Commission may lawfully impose upon the Company's provision of service contemplated by this Application. Upon Commission request, STANDUP is prepared to answer questions or present additional testimony or other evidence about its services within the state. STANDUP commits that 100% of federal universal service funds will flow through directly to Lifeline customers.

J. Waiver Request

NDAC §69-09-05-12(6)(a) requires a full description of available services in the ETC's official telephone directory. Since STANDUP is a CMRS provider, it does not have an official telephone directory in North Dakota and hereby respectfully requests a waiver from this requirement pursuant to NDAC §69-09-05-12(2)(c) and (d).

VI. DESIGNATION OF STANDUP AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is "to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies" to all citizens, regardless of geographic location or income.²⁷ Designation of STANDUP as an ETC in North Dakota will further that public interest. Whether because of financial constraints, poor credit history, or intermittent employment, many low-income consumers often lack the countless choices available to most consumers and thus have yet to reap the full benefits of the intensely competitive wireless market.

²⁷ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

The instant request for ETC designation must be examined in light of the Act’s goal of providing low-income consumers with access to telecommunications services. The primary purpose of universal service is to ensure that consumers—particularly low-income consumers—receive affordable and comparable telecommunications services. The FCC has in recent years expanded the Lifeline program to cover broadband services, noting that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”²⁸ Given this context, designating STANDUP as an ETC would significantly benefit low-income consumers eligible for Lifeline services in North Dakota—the intended beneficiaries of universal service.

A. Advantages of STANDUP’s Service Offering

STANDUP offers a unique, easy to use, competitive, and highly affordable wireless telecommunications service, which benefits qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional service. The public interest benefits of STANDUP’s wireless service include larger calling areas (as compared to traditional wireline carriers), the convenience and security afforded by mobile service, and a generous amount of voice and broadband access included without cost (after application of the Lifeline support), as well as free access to caller ID, call waiting, and Voicemail features, and access to 911 services regardless of the number of voice minutes remaining on the Lifeline consumer’s plan. These no cost to consumer services and low-cost minutes are an invaluable

²⁸ See *Lifeline Modernization Order* ¶ 2.

resource for cash-strapped consumers, and the prepaid nature of the service also provides an alternative for “unbanked” consumers.

STANDUP’s Lifeline offerings compare favorably with those of other competitive ETCs, and provide Lifeline customers with voice minutes, unlimited text messages, and a data allotment (meeting the voice and broadband minimum service standards), at no net cost to the customer after application of Lifeline support. STANDUP’s Lifeline offering will be provided over T-Mobile’s 4G LTE network. STANDUP’s prepaid wireless service is likely to be an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues.

In today’s market, consumers, including qualified Lifeline customers, view the portability and convenience of wireless service not as a luxury, but as a necessity. Mobile service allows children to reach their parents wherever they may be, allows a person seeking employment greater ability to be contacted by potential employers, and provides end users with the ability to contact emergency service providers regardless of location. Mobile service often also serves as a key bridge in closing the homework gap for students who live in rural areas with limited access to broadband.

Without question, prepaid wireless services have become essential for low-income customers, providing them with value for their money, access to emergency services on wireless devices, and a reliable means of contact for prospective employers, social service agencies or dependents. Providing STANDUP with the authority necessary to offer discounted Lifeline service to those without wireless service—or most in danger of losing service altogether—undoubtedly promotes the public interest.

B. The Benefits of Competitive Choice

The FCC has acknowledged the benefits to consumers of being able to choose from among a variety of telecommunications service providers for more than three decades.²⁹ Increasing customer choice promotes competition and innovation, thus spurring other carriers to target low-income consumers with service offerings tailored to their needs, ultimately resulting in improved services to consumers. Designation of STANDUP as an ETC will help ensure that quality services are available at “just, reasonable, and affordable rates” as envisioned in the Act.³⁰ Introducing STANDUP into the market as an additional wireless ETC provider will afford low-income North Dakota residents a wider choice of providers and available services while creating a competitive marketplace as ETCs compete for a finite number of Lifeline-eligible customers. Increasing the competitive marketplace of providers has the potential to effectively increase the penetration rate and reduce the number of individuals not connected to the PSTN.

C. Impact on the Universal Service Fund

With Lifeline, ETCs only receive support for customers they obtain. The amount of support available to an eligible subscriber is exactly the same whether the support is given through a company such as STANDUP or the Incumbent LEC operating in the same service area. The number of persons eligible for Lifeline support is the same regardless of the number of ETCs; thus, STANDUP will only increase the amount of USF Lifeline funding in situations where it obtains Lifeline customers not already enrolled in another ETC’s Lifeline program. By implementing the safeguards set forth in the *Lifeline and Link Up Reform Order* and utilizing the NLAD and National Verifier, the likelihood that STANDUP’s customers are not eligible or are receiving duplicative

²⁹ See, e.g., *Specialized Common Carrier Services*, 29 FCC Rcd 870 (1971).

³⁰ See 47 U.S.C. § 254(b)(1).

support either individually or within their household is greatly minimized. STANDUP's ability to increase the Lifeline participation rate of qualified low-income individuals will further the goal of Congress to provide all individuals with affordable access to telecommunications service, and thus any incremental increases in Lifeline expenditures are far outweighed by the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

VII. CONCLUSION

Based on the foregoing, designation of STANDUP as an ETC in the State of North Dakota satisfies the requirements of Section 214(e)(2) of the Act and is in the public interest.

WHEREFORE, STANDUP respectfully requests that the Commission promptly designate STANDUP as an ETC in the State of North Dakota for the purpose of participating in the Lifeline program.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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*Attorneys for Global Connection Inc. of America
d/b/a StandUp Wireless*

July 2, 2024

**BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION**

Application of Global Connection Inc. of America)
d/b/a STANDUP WIRELESS for Designation as an)
Eligible Telecommunications Carrier)

Case No. _____

Certification Relating to Order Provisions

I, Jennifer Carter, the Chief Operating Officer (COO) and Chief Compliance Officer (CCO) of Global Connection Inc. of America d/b/a STANDUP WIRELESS (“STANDUP”), have the authority to bind STANDUP and hereby certify that STANDUP will comply with the service requirements applicable to the low-income support it receives, and further certify as follows:

1. STANDUP 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.
2. For the telephone exchanges enumerated, STANDUP 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 (Lifeline-Only ETC), and STANDUP will be responsible for compliance with this Certification, the Public Service Commission's order in this proceeding, and conditions and criteria set forth in the applicable federal and state laws and rules pertaining to Lifeline-Only ETCs.

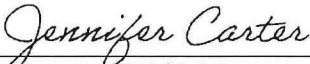
The provision in Chapter 69-09-05 of the North Dakota Administrative Code requiring the ETC to describe services in the “carrier’s official telephone directory” is not applicable because STANDUP has no such directory.

3. STANDUP agrees to comply with all statements, processes and procedures set forth in its Application for designation as a Lifeline-Only ETC in the enumerated telephone exchanges. STANDUP agrees that all statements made and matters set forth in its Application are true and correct to the best of STANDUP’s knowledge, information, and belief.
4. STANDUP will use the federal low-income universal service support it receives only for the provision of services for which the support is intended.
5. STANDUP meets all of the prerequisites to be designated as a Lifeline-Only ETC throughout the proposed ETC Designated Area in this proceeding.

6. STANDUP 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 a Lifeline-Only ETC, including voice grade access, minutes of use for local service at no additional charge, access to emergency services and toll limitation services.
7. STANDUP will provide service on a timely basis to requesting customers within STANDUP's proposed designated service area where STANDUP's network already passes the customer's premises.
8. STANDUP will provide service within a reasonable period of time, if the potential customer is within STANDUP'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.
9. STANDUP will not seek Universal Service Fund high-cost support for any telephone exchanges in its designated service area in North Dakota.
10. STANDUP 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 eligibility criteria in 47 C.F.R. § 54.409 and the relevant proof documentation specified in 47 C.F.R. § 54.410. STANDUP will reply upon the FCC's National Lifeline Eligibility Verifier and National Lifeline Accountability Database to prevent duplication and determine eligibility.
11. STANDUP 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.
12. STANDUP 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.
13. STANDUP 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.
14. STANDUP will offer the services described in its Application.

15. STANDUP understands and agrees that if STANDUP has not advertised its Lifeline services or signed up any North Dakota customers within 12 months of the effective date of STANDUP's designation as a Lifeline-only ETC, the Public Service Commission may revoke STANDUP's Lifeline-only ETC designation and STANDUP may reapply to be designated as a Lifeline-only ETC in North Dakota.
16. STANDUP 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 annual ETC report filed with the FCC, within 30 days of filing with the FCC.
17. STANDUP 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.
18. STANDUP agrees to maintain the records to demonstrate that STANDUP has complied with the requirements of the Public Service Commission's order(s) and that STANDUP will preserve records demonstrating compliance for Public Service Commission inspection at any reasonable time upon reasonable notice.
19. STANDUP understands and agrees that, to the extent there are any conflicts or inconsistencies between STANDUP's Application and the provisions in this Certification, the Certification provisions control.

Dated: 6/21/24



Jennifer Carter, COO/CCO
Global Connection Inc. of America
d/b/a STANDUP WIRELESS

EXHIBIT 2

FCC-Approved Compliance Plan



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 18-854

Released: August 15, 2018

WIRELINE COMPETITION BUREAU APPROVES THE WIRELINE AND WIRELESS COMPLIANCE PLAN OF GLOBAL CONNECTION

WC Docket Nos. 09-197, 11-42

The Wireline Competition Bureau (Bureau) hereby approves the joint wireline and wireless compliance plan¹ of Global Connection, Inc. of America, (Global Connection) filed pursuant to the requirements for the continued provision of Lifeline service.²

The Act provides that a carrier be designated as an eligible telecommunications carrier (ETC) to receive universal service support.³ The Commission has required that all telecommunications carriers seeking Lifeline-only ETC designation must meet the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement its obligations.⁴

The Bureau has clarified that any transfer of ownership or control of an ETC with an approved Lifeline compliance plan requires Commission approval in advance of the transaction.⁵ This includes renewing compliance plan approval for changes in the corporate ownership and control of the ETC.⁶

In accordance with this requirement, Global Connection submitted an amended compliance plan for both its wireline and wireless Lifeline services for Bureau approval.⁷ Global Connection has previously-approved wireline and wireless compliance plans⁸ and currently provides resold wireline

¹ See Global Connection Inc. of America Revised Wireline and Wireless Compliance Plan, WC Docket No. 09-197, 11-42 (filed Apr. 16, 2018) (*Global Connection Compliance Plan*).

² See *Lifeline and Link Up Reform and Modernization et al*, 27 FCC Rcd 6656, 6816, paras. 379-380 (2012) (*2012 Lifeline Reform Order*); *In the Matter of Lifeline & Link Up Reform & Modernization*, 30 FCC Rcd 7818 (2015) (*2015 Lifeline Order*).

³ 47 U.S.C. § 214(e)(1)(A).

⁴ See *2012 Lifeline Reform Order*, 27 FCC Rcd at 6814, 6819, paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *2012 Lifeline Reform Order*. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, 27 FCC Rcd 2186 (WCB 2012).

⁵ *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Universal Service Support*, Public Notice, 29 FCC Rcd 9144, 9145 (WCB 2014) (*2014 ETC Public Notice*).

⁶ *Id.*

⁷ See *Global Connection Compliance Plan*.

⁸ See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom, and Total Call*, Public Notice, 27 FCC Rcd 5776 (WCB 2012); *Wireline Competition Bureau Approves the Wireline Compliance Plans of*

Lifeline service in twenty-six states and wireless Lifeline service in twenty-six states and territories.⁹ Global Connection is a wholly-owned subsidiary of Global Connection Holdings Corporation (Global Holdings).¹⁰ Odin Mobile LLC has entered into a purchase agreement to acquire a majority ownership interest in Global Holdings.¹¹ Pursuant to the terms of the agreement, Odin Mobile will acquire 75 percent of Global Holdings' stock.¹² Global Holdings will retain the remaining minority ownership interest.¹³

The Bureau has reviewed Global Connection's combined wireline and wireless compliance plan for conformance with the relevant requirements, and now approves the compliance plan. We note that with respect to this matter, Global Connection will remain the only entity with an approved compliance plan. Additionally, Global Connection must continue to comply with any future additions to or amendments of the Lifeline program rules unless it has relinquished its relevant designation(s) pursuant to section 214(e)(4) of the Act.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Christian Hoefly, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-3607.

- FCC -

(Continued from previous page) _____

Global Connection and Phone Club Corporation, Public Notice, 31 FCC Rcd 8860 (WCB 2016).

⁹ *Global Connection Compliance Plan*, at 3. The twenty-six wireline states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. The twenty-six wireless states and territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia.

¹⁰ *Global Connection Compliance Plan*, at 3.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

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AFFILIATE OFFICE
MUMBAI, INDIA

April 16, 2018

VIA ECFS

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

Re: Global Connection Inc. of America Revised Wireless and Wireline
Compliance Plan; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On February 22, 2017, Global Connection Inc. of America (Global Connection or Company) submitted for approval from the Wireline Competition Bureau (Bureau) an Amended Compliance Plan for both its wireline¹ and wireless² Lifeline services. Pursuant to discussions with Bureau staff, Global Connection hereby submits a revised version of its pending Amended Compliance Plan, updating the information provided therein to reflect the passage of time.

Current Wireless and Wireline Operations

As discussed in the Amended Compliance Plan, Global Connection currently provides

¹ The Company has an approved wireline Compliance plan, originally filed on June 26, 2012 and most recently revised on July 14, 2016. The Bureau approved Global Connection's wireline Compliance Plan on August 10, 2016. See *Wireline Competition Bureau Approves the Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Docket Nos. 09-197 and 11-42, Public Notice, DA 16-905 (rel. Aug. 10, 2016).

² The Company has an approved wireless Compliance Plan, originally filed on March 8, 2012 and most recently revised on April 30, 2012. The Bureau approved Global Connection's wireless Compliance Plan on May 25, 2012. See *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Docket. Nos. 09-197 and 11-42, Public Notice, DA 12-828 (rel. May 25, 2012).

Marlene H. Dortch, Secretary
April 16, 2018
Page Two

wireless service in twenty-six (26) territories and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states. The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states, and on a wireless basis in all twenty-six (26) of its wireless service state territories.

Compliance Plan Updates Due to the Passage of Time

The proposed Amended Compliance Plan has been revised to update the details of Global Connection's wireline and wireless operations and Lifeline ETC designations (*see* pp. 3-4), customer service contact information (*see* p. 13) and financial and technical capability (*see* pp. 26-31). It also incorporates revisions to Company procedures and commitments throughout to reflect recent changes to Lifeline program rules. Global Connection provides updates regarding its handset policies (*see* pp. 6-7), its enrollment process, including changes to reflect enrollments using the National Verifier where available (*see* pp. 7, 9, 10, 17), explains its rolling annual recertification process (*see* pp. 17-18) and provides updates regarding means to ensure compliance with the one-per-household requirement (*see* pp. 20-21). In addition, the Amended Compliance Plan provides the Company's current wireline and wireless Lifeline service plan options (*see* pp. 24-26). Current exhibit materials for the Company's wireless and wireline Lifeline operations (sample enrollment forms, income eligibility worksheets, one-per-household worksheets, and marketing materials) are included.

Global Connection hereby submits its proposed Amended Compliance Plan with the above-described revisions. The Company respectfully reiterates its request for expeditious approval of its Amended Compliance Plan in order to ensure continued provision of wireline and wireless Lifeline services as discussed herein.

This letter and revised Amended Compliance Plan are being filed electronically for inclusion in the public record of the above-referenced proceedings.

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary
April 16, 2018
Page Three

Please feel free to contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John J. Heitmann". The signature is fluid and cursive, with a large initial "J" and "H".

John J. Heitmann
Joshua T. Guyan

Counsel to Global Connection Inc. of America

cc: Ryan Palmer
Jodie Griffin

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Global Connection Inc. of America	

GLOBAL CONNECTION INC. OF AMERICA COMPLIANCE PLAN

Global Connection Inc. of America (“Global Connection” or the “Company”),¹ through its undersigned counsel, hereby respectfully submits and requests expeditious approval of these revisions to its approved Compliance Plan outlining the measures it will take to comply with the Federal Communications Commission’s (“Commission’s” or “FCC’s”) Lifeline rules and implement the conditions imposed by the Commission in its Lifeline program rules and implementing orders and guidance.² On March 8, 2012, Global Connection filed a Compliance Plan

¹ Global Connection hereby reports its corporate and trade names, and identifiers, for its wireless service as Stand Up Wireless (dba) and for its wireline service as Real Home Phone (trade name). The Company reports its holding company as Global Connection Holdings Corporation (“Global Holdings”). Global Connection has no separate operating companies and no affiliates. Following the change in Global Connection’s majority ownership proposed herein, the Company’s corporate and trade names, and identifiers will remain unchanged and it will continue to have no separate operating companies. Following the change in majority ownership, Global Connection will be affiliated with Prepaid Wireless Group, LLC, Prepaid Wireless Wholesale, LLC and X Wireless discussed in detail in Section III herein and Cintex Wireless, LLC, a Maryland limited liability company providing Lifeline and non-Lifeline prepaid wireless services in Arkansas, Maryland, Maine, Rhode Island and West Virginia, and wholesale wireless communications services.

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012) (“2012

for its wireless service. Global Connection's wireless Compliance Plan was approved by the Wireline Competition Bureau (Bureau) on May 25, 2012.³ On June 26, 2012, Global Connection filed a Compliance Plan for its wireline service, which was most recently revised and re-filed on July 14, 2016. Global Connection's wireline Compliance Plan was approved by the Wireline Competition Bureau ("Bureau") on August 10, 2016.⁴ On February 22, 2017, Global Connection filed a revised wireless Compliance Plan to reflect a proposed change in ownership of the Company, include Global Connection's wireline Lifeline services, and otherwise update the information provided therein. Global Connection files this revised Compliance Plan to further update the information provided herein due to the passage of time.⁵

Lifeline Reform Order"). The Company herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012) ("*Compliance Plan Public Notice*"). See also *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, ¶ 249 (rel. June 22, 2015) ("*2015 Lifeline Order*"); *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (hereinafter, "*2016 Lifeline Modernization Order*"); *Bridging the Digital Divide for Low-Income Consumers Lifeline and Link Up Reform and Modernization Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (2017) ("*2017 Lifeline Digital Divide Order*").

³ *Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, Terracom and Total Call*, WC Dckt. Nos. 09-197 and 11-42, DA 12-828 (rel. May 25, 2012).

⁴ *Wireline Competition Bureau Approves The Wireline Compliance Plans of Global Connection and Phone Club Corporation*, WC Dckt. Nos. 09-197 and 11-42, (rel. August 10, 2016).

⁵ Global Connection also has a Petition for Eligible Telecommunications Carrier ("ETC") Designation in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia ("ETC Petition") pending at the Commission. See *Petition of Global Connection Inc. of America. For Designation as an Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia* ("ETC Petition") WC Docket No. 09-197, filed April 4, 2012. This ETC Petition was subsequently amended on February 26, 2013 to update it in light of the Commission's rule changes affecting Lifeline-only ETCs. Global

Global Connection provides wireless service in twenty-six (26) territories⁶ and prepaid wireline local exchange and long distance services to residential customers in twenty-six (26) states.⁷ The Company is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in twelve (12) states,⁸ and on a wireless basis in all twenty-six (26) of its wireless service territories.

Change in Ownership of Global Connection

As noted above, Global Connection is currently wholly-owned by Global Holdings. As described in Section III below, Global Holdings, Global Connection and Odin Mobile, LLC (“Odin Mobile”) have entered into an agreement pursuant to which Odin Mobile will acquire seventy five percent (75%) of the direct stock interest in Global Connection. Ultimate (indirect) control of Global Connection will be transferred to the majority interest holder in Odin Mobile, Paul Greene, a United States citizen. Global Holdings will retain minority direct interest in Global Connection (twenty five percent (25%)). The transaction will not result in any loss or impairment of service for any customer.

Connection still seeks Lifeline-only designation for which the Commission is the proper designating authority, because the states lack the authority to perform such designation for wireless telecommunications service providers seeking designation.

⁶ Those twenty-six territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Nevada, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

⁷ Those twenty-six states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Mississippi, Nebraska, New Mexico, North Carolina, Ohio, Oklahoma, Oregon, South Carolina, Tennessee, Texas, and Washington, West Virginia, and Wisconsin. Global Connection also holds domestic interstate and international section 214 authority from the FCC. The Company is properly registered with the FCC to provide telecommunications services pursuant to 47 C.F.R. § 64.1195.

⁸ Those twelve states are: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

The Company commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers. Global Connection complies with 911 requirements as described below and qualifies for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act to participate as an ETC in the Lifeline program.⁹

Global Connection complies fully with all conditions set forth in the 2012 Lifeline Reform Order and 2016 Lifeline Modernization Order, as well as with the Commission's Lifeline rules and policies more generally.¹⁰ This Compliance Plan describes the specific measures that the Company has implemented to achieve these objectives. Specifically, this Compliance Plan: (1) describes in detail the measures that Global Connection takes to implement the obligations contained in the Lifeline program rules and orders, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Low Income Fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provides a detailed description of how Global Connection offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

⁹ See 2012 Lifeline Reform Order ¶ 368. Although Global Connection qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of section 214(e)(1)(A) for purposes of the federal Lifeline program, the Company reserves the right to demonstrate to a state public utilities commission that it provides service using its own facilities in a state for purposes of state universal service funding under state program rules and requirements. Global Connection will follow the requirements of the Commission's Lifeline rules and this Compliance Plan in all states in which it provides Lifeline service and receives reimbursements from the federal Low-Income fund, including in any state where the public utilities commission determines that Global Connection provides service using its own facilities for purposes of a state universal service program.

¹⁰ Global Connection will update its associated Lifeline program forms and advertising, whenever necessary, to reflect Commission changes to the applicable Lifeline program rules.

ACCESS TO 911 AND E911 SERVICES¹¹

Pursuant to the 2012 Lifeline Reform Order, forbearance is conditioned upon the Company: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its wireless Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of wireless Lifeline-eligible subscribers who obtain Lifeline-supported services.¹² The Company also complies with the Commission's 911 and E911 requirements for its wireline services; however, the handset requirement is not applicable to Global Connection's wireline services. The Company will provide its wireless Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all of the Company's wireless customers will have available access to emergency calling services at the time that Lifeline voice telephony service is initiated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining. All of the Company's wireline customers will have available access to emergency calling services at the time that Lifeline service is initiated. This 911 and E911 access will be available to those using the Company's services at all times until service is disconnected.

Global Connection's existing practices currently provide access to 911 and E911 services for all customers. The Company uses Sprint, Verizon Wireless, AT&T and T-Mobile as its underlying network providers/carriers for its wireless services and AT&T, CenturyLink, Windstream, Verizon and Frontier West as its underlying network providers/carriers for its wireline services. For both its wireless and wireline Lifeline services, Global Connection's underlying network providers/carriers

¹¹ See Compliance Plan Public Notice at 3.

¹² See 2012 Lifeline Reform Order ¶ 373.

route 911 calls from the Company's customers in the same manner as 911 calls from their own retail customers.

For the Company's wireless service, to the extent that Global Connection's underlying providers/carriers are certified in a given PSAP territory, this 911 capability will function the same for the Company. Global Connection also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active or suspended. For the Company's wireless voice telephony service, Global Connection transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. Global Connection's handsets provided in connection with the wireless Lifeline service offering have always been and will continue to be 911 and E911-compliant. The Company's phones have passed a stringent certification process, which ensures that the handset models provided meet all 911 and E911 requirements. As a result, any existing wireless customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in Global Connection's Lifeline voice telephony service can choose to use their own device or receive one from Global Connection, which will be 911/E911-compliant. As discussed above, this requirement does not apply to Global Connection's wireline services.

To further obtain the benefits of a modernized Lifeline program, the 2016 Lifeline Modernization Order also set forth the requirement that Lifeline providers providing both mobile broadband services and devices to their consumers provide handset devices that are Wi-Fi enabled.¹³ The Commission further requires such providers to offer the choice to Lifeline customers of devices

¹³ See 2016 Lifeline Modernization Order ¶ 366.

that are equipped with hotspot functionality.¹⁴ Pursuant to the Lifeline rules, Global Connection will provide handset devices that are Wi-Fi enabled as well as the choice to consumers to acquire devices that are equipped with hotspot functionality as outlined in the 2016 Lifeline Modernization Order.¹⁵

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE¹⁶

A. Policy

Global Connection will comply with the uniform eligibility criteria established in section 54.409 of the Commission's rules, as amended by and through the 2016 Lifeline Modernization Order, as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC. Applicants in states where the National Verifier is available will be enrolled after their eligibility has been determined by the National Verifier.

Therefore, all subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below one hundred-thirty five percent (135%) of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in sections 54.409 of the Commission's rules. In addition, through the certification requirements described below and the use of the National Lifeline Accountability Database ("NLAD"), the Company confirms that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

¹⁴ *See id.* The 2016 Lifeline Modernization Order clarifies that the requirement to provide Wi-Fi-enabled handsets does not apply to Global Connection devices provided prior to the effective date of the rule (December 2, 2016).

¹⁵ *See* 2016 Lifeline Modernization Order ¶ 378. *See also* 47 C.F.R. § 54.408(f).

¹⁶ *See* Compliance Plan Public Notice at 3.

B. Eligibility Determination

For both wireless and wireline Lifeline services, customers can enroll in person by calling Global Connection's customer service center or online. For the Company's wireless service, more than ninety percent (90%) of customer enrollment is done in-person at events hosted by the Company, as opposed to over the phone or the Internet.

Global Connection currently uses the CGM, LLC Lifeline enrollment application – which is used by dozens of ETCs – for its in-person wireless Lifeline customer enrollments. The CGM Lifeline enrollment application works on a tablet or computer and provides the required disclosures, and collects applicant information, identity documentation (where requested by the ETC or necessary for NLAD third-party identity verification (“TPIV”) dispute resolutions), and proof of eligibility. It also requires applicants to make the required certifications for Lifeline service. The application will then check any available state or federal eligibility databases, Global Connection's designated service territory in the state, underlying carrier coverage area and conduct the NLAD duplicate check.

Approximately forty percent (40%) of the Company's wireline customer enrollment is done in-person at store locations that sell Global Connection services, as opposed to over the phone or the Internet. Global Connection currently has nearly five hundred (500) active agent locations, generally at retail locations such as convenience and check cashing stores.¹⁷

At such enrollment events and store locations, Global Connection requires all prospective customers to show a valid government-issued photo identification¹⁸ and the address is checked

¹⁷ Global Connection does not enroll wireline Lifeline applicants at mobile enrollment events at this time, but may do so in the future.

¹⁸ Any identification documentation collected, including documentation used in NLAD processes to verify identity are now retained pursuant to the 2015 Lifeline Order. *See* 2015 Lifeline Order ¶ 224, *supra* n. 2.

against the E911 database to clear service from Global Connection's underlying providers. Each prospective customer is checked against the NLAD to ensure that the applicant does not already receive Lifeline service before the customer is enrolled.¹⁹

All agents enrolling Lifeline customers for Global Connection have a portal login, which tracks the agent's activities²⁰ and allows them to enroll customers and provide the required disclosures, collect the required information and receive the required certifications as set forth in the Company's Lifeline application/certification form. The applicant populates the application form with the assistance of the agent as necessary or requested, which is then printed for the applicant's review, signature and date. The enrolling agent is then required to fax or email the application and proof of eligibility to Global Connection for review as discussed in further detail below.

Wireless and wireline customers that enroll by calling Global Connection's customer service number are sent an application/certification form to complete, sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility. Customers may also complete the Certification form through our Lifeline Interactive Voice Response Line and following the prompts. Customers will either fax, email or mail a copy of their eligibility proof and copy of government-issued identification.

Finally, customers can also enroll online by completing and printing an application to sign and return by electronic mail, fax, or U.S. mail along with a copy of the prospective customer's proof of eligibility and government-issued identification.

As discussed in further detail in Section I.F. below, all employees or agents (Company personnel) that conduct in-person enrollments are trained regarding the eligibility and certification

¹⁹ See *infra* Section I.F. regarding use of the NLAD.

²⁰ Global Connection fully supports USAC's efforts to register agents for tracking in the NLAD and the National Verifier.

requirements in the Commission's rules and this Compliance Plan, including the one-per-household requirement, and told to inform potential customers of those requirements. New Company personnel undergo an initial mandatory training session where they are given training materials, as well as shown visual examples of documents acceptable to demonstrate eligibility for the Lifeline program.

If Global Connection cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases (including the National Verifier, once in place), Company personnel, who are non-commissioned employees, will collect documentation establishing eligibility pursuant to the Lifeline rules.²¹ All personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal income-based and/or program-based criteria set forth in 47 C.F.R. § 54.409. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the Commission's rules. A Global Connection employee will be responsible for overseeing and approving every Lifeline application prior to enrolling the applicant for Lifeline service and including that customer on a request for reimbursement.

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.²² In the absence of the National Verifier or a state eligibility database, acceptable documentation of program eligibility as defined by the Lifeline rules is reviewed by a Global Connection employee during the electronic order process. Acceptable documentation of program eligibility includes: (1) the current or prior year's

²¹ See 2012 Lifeline Reform Order ¶ 100; 2016 Lifeline Modernization Order ¶ 416. 47 C.F.R § 54.410(b)(1)(i)(B), 47 C.F.R § 54.410(c)(1)(i)(B).

²² See 2012 Lifeline Reform Order ¶ 101. See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/>.

statement of benefits from a qualifying assistance program; (2) a notice or letter of participation in a qualifying assistance program; (3) program participation documents (e.g., the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.²³

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three months' time.²⁴ If the prospective subscriber presents the Company with documentation of income that does not cover a full year, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.²⁵

Company personnel will examine this documentation for each Lifeline applicant, and comply with the requirement to retain and protect proof of eligibility.²⁶ Where Company personnel conclude that proffered documentation is insufficient to establish such eligibility, Global Connection will deny the associated application and inform the applicant of the reason for such rejection. In the event that

²³ See 47 C.F.R. § 54.410(c)(1)(i)(B). See also USAC Guidance available at <http://www.usac.org/li/program-requirements/verify-eligibility/program-eligibility.aspx>

²⁴ See 47 C.F.R. § 54.410(b)(1)(i)(B).

²⁵ See *id.*

²⁶ See 2015 Lifeline Order ¶ 224 *supra* n. 2; 47 C.F.R. §§ 54.404(b)(11), 54.410(b)(1)(ii), 54.410(c)(1)(ii).

Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.

Further, Global Connection will not enroll customers at retail locations where Global Connection does not have an agency agreement with the retailer. Global Connection will require an agent retailer to have any employees involved in the enrollment process go through the standard Global Connection training process, just as it would for any other Company personnel. By establishing agency relationships with all of its Company personnel, including future retail outlets, Global Connection meets the "deal directly" requirement adopted in the TracFone Forbearance Order.²⁷

The Commission determined in the 2012 Lifeline Reform Order that ETCs may permit agents or representatives to review documentation of consumer program eligibility for Lifeline because "the Commission has consistently found that '[I]icensees and other Commission regulatees are responsible for the acts and omissions of their employees and independent contractors.'"²⁸ Global Connection is responsible for the actions of all of its employees and agents, including those enrolling customers in any Global Connection owned or affiliated retail locations, and a non-commissioned Global Connection employee will be responsible for overseeing and finalizing every Lifeline application prior to approving the application and including that customer on a request for reimbursement. The Company will therefore always "deal directly" with its customers to certify and verify the customer's Lifeline eligibility.

De-Enrollment for Ineligibility. If Global Connection has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the

²⁷ See Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, FCC 05-165, ¶ 19 (2005).

²⁸ 2012 Lifeline Reform Order ¶ 110.

subscriber of impending termination in writing, will comply with any state dispute resolution procedures applicable to Lifeline termination, and will give the subscriber thirty (30) days to demonstrate continued eligibility.²⁹ A demonstration of eligibility must comply with the annual verification procedures below and found in rule section 54.410(f), including the submission of a certification form.

As required by the Commission's rules, if a customer contacts the Company and states that he or she is not eligible for Lifeline or wishes to de-enroll for any reason, the Company will de-enroll the customer within two (2) business days.³⁰ Customers can make this request by calling the Company's customer service number and will not be required to submit any documents. Wireline customers can call customer service by dialing 1-877-331-1059 and wireless customers can call customer service by dialing 1-800-544-4441. Live customer service and bilingual operators can currently be reached for wireline Lifeline service support from 8:30 AM to 6:00 PM Eastern, Monday through Friday, excluding holidays, and for wireless Lifeline service support, from 8:30 AM to 7 PM Eastern, Monday through Friday, and 10 AM to 2 PM Eastern on Saturday, excluding holidays.

C. Subscriber Certifications for Enrollment

Global Connection has implemented certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the Commission's Lifeline rules, together with any additional state certification requirements.³¹ The Company shares the Commission's concern about abuse of the Lifeline program and is thus

²⁹ See 2012 Lifeline Reform Order ¶ 143; 47 C.F.R. § 54.405(e)(1).

³⁰ See 47 C.F.R. § 54.405(e)(5).

³¹ 2012 Lifeline Reform Order ¶ 61; 47 C.F.R. § 54.410(a).

committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally. Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below.³² Applicants that seek to enroll based on income eligibility can do so through the electronic enrollment application or will be referred to a worksheet showing the Federal Poverty Guidelines by household size.³³ Applicants that do not complete the form in person will be required to return the signed application/certification to the Company by mail, facsimile, electronic mail or other electronic transmission. In addition, Company personnel will orally explain the certifications to consumers when they are enrolling in person or over the phone.³⁴

Disclosures. The Company's application and certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) 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; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the

³² See Model Application/Certification Forms, included as **Exhibit A**. Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form by July 1, 2018. See *FCC Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program*, WC Docket No. 11-42, Public Notice, "Wireline Competition Bureau Provides Guidance on Universal Forms for the Lifeline Program," DA 18-161 (rel. Feb. 20, 2018) ("*Lifeline Form Public Notice*"). See also Compliance Plan Public Notice at 3.

³³ See Income Eligibility Worksheets, included as **Exhibit B**. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. See *Lifeline Form Public Notice*.)

³⁴ See 2012 Lifeline Reform Order ¶ 123.

Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.³⁵

Applications and certification forms will also state that: (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, and (5) the program is limited to one discount per household.³⁶

Information Collection. The Company also will collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient³⁷); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.³⁸

Applicant Certification. Consistent with rule section 54.410(d)(3), the Company will require the applicant to initial his or her acknowledgement, individually and under penalty of perjury, in

³⁵ See *id.* ¶ 121; 47 C.F.R. § 54.410(d)(1).

³⁶ See 47 C.F.R. § 54.405(c).

³⁷ See 2012 Lifeline Reform Order ¶ 87.

³⁸ See 47 C.F.R. § 54.410(d)(2).

writing or by electronic signature or interactive voice response recording,³⁹ the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify the Company within thirty (30) days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, he or she lives on Tribal lands; (4) if the applicant moves to a new address, he or she will provide that new address to the Company within thirty (30) days; (5) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (6) the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge; (7) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (8) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize Global Connection to access any records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Company Lifeline credit.⁴⁰ The applicant must also

³⁹ See 2012 Lifeline Reform Order ¶¶ 168-69; 47 C.F.R. § 54.419.

⁴⁰ See 2012 Lifeline Reform Order ¶¶ 168-196; 47 C.F.R. § 54.419.

authorize the Company to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in a Lifeline program database.⁴¹

D. Annual Verification Procedures

Global Connection re-certifies all subscribers within 12 months after the subscriber's service initiation date and within every 12 months thereafter, except for subscribers in states where the National Verifier, state Lifeline administrator, or other state agency is responsible for the annual re-certification of subscribers' Lifeline eligibility in accordance with section 54.410(f). If the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases containing information regarding enrollment in qualifying assistance programs, then the Company obtains a signed certification from the subscriber on a form that meets the certification requirements in section 54.410(d) of the Commission's rules. This certification includes a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.⁴² Further, the verification materials inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.⁴³ By July 1, 2018, Global Connection will use the standardized form to re-certify a qualifying low-income consumer.⁴⁴

⁴¹ See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. See 47 C.F.R. § 54.404(b)(9).

⁴² See 2012 Lifeline Reform Order ¶ 120.

⁴³ See 2012 Lifeline Reform Order ¶ 145.

⁴⁴ See Lifeline Form Public Notice.

Verification De-Enrollment. Global Connection de-enrolls subscribers that do not respond to the annual verification or fail to provide the required certification.⁴⁵ The Company sends a single written notice explaining that failure to respond to the re-certification request within sixty (60) days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within the sixty (60) days, the Company de-enrolls the subscriber within five business days after the expiration of the subscriber's time to respond to the re-certification efforts.⁴⁶

E. Activation and Non-Usage

For the Company's wireless Lifeline service, Global Connection will not consider a wireless prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates the Company's prepaid service by dialing a specified dedicated number from their Global Connection-issued handset.⁴⁷ For enrollments at in-person events, the Lifeline application and certifications are tied to a phone number for the handset that is provided to the new Lifeline customer. The customer activates the phone in-person with the Company personnel on site. For enrollments that are over the phone or through the Internet, the phones are shipped directly to the eligible customer. The customer must sign for the phone and then use it to call the dedicated Global Connection number provided to activate the phone.

⁴⁵ See revised 47 C.F.R. § 54.54.405(e)(4).

⁴⁶ Global Connection also sends messages to its customers to educate them regarding the annual recertification process and requirement, as contemplated by the 2012 Lifeline Reform Order. This type of educational recertification message is consistent with the 2012 Lifeline Reform Order, which states that "ETCs and states may also choose to notify subscribers about the re-certification requirements in their Lifeline outreach materials. By taking these actions, ETCs and states will ensure that consumers are aware of the importance of responding to re-certification efforts, and that they are not inadvertently disconnected due to a lack of understanding of program rules." 2012 Lifeline Reform Order ¶ 145.

⁴⁷ See 2012 Lifeline Reform Order ¶ 257; 47 C.F.R. § 54.407(c)(1).

In addition, after service activation, Global Connection will not seek reimbursement from the USF for and will de-enroll any subscriber that has not used Global Connection's Lifeline service as set forth in 47 C.F.R. § 54.407(c)(2). An account will be considered active if the authorized subscriber establishes usage, as "usage" is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days or during the notice period set forth in 47 C.F.R. 54.405(e)(3), currently a period of 15 days. In accordance with 47 C.F.R. § 54.405(e)(3), Global Connection will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber's failure to use the Lifeline service within the notice period will result in service termination for non-usage. Global Connection will update the NLAD within one (1) business day of de-enrolling a subscriber for non-use and will submit a non-usage de-enrollment report annually to USAC.⁴⁸

Global Connection's wireline service offerings are prepaid and the Company assesses and collects a monthly fee from each wireline subscriber. Customers often make payments in person at Global Connection store locations. Therefore, Global Connection's wireline customers have a regular billing relationship with the Company and the activation and non-usage requirements do not apply.⁴⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Global Connection has implemented measures and procedures to prevent duplicate Lifeline benefits being awarded to

⁴⁸ See 2012 Lifeline Reform Order at ¶ 257; see also 47 C.F.R. §§ 54.404(b)(10) and 54.405(e)(3), respectively.

⁴⁹ See 2012 Lifeline Reform Order ¶¶ 257, 263; 47 C.F.R. § 54.407(c).

the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

National Lifeline Accountability Database (NLAD). The Company complies with the requirements of the NLAD and section 54.404 of the Commission's rules. As such, the Company queries the NLAD for every enrollment⁵⁰ to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber's residential address is currently receiving Lifeline service.⁵¹

In addition to checking the NLAD, Company personnel emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training materials include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All customer-facing employees and agents must demonstrate understanding of the Commission's and Global Connection's rules and policies by completing the Company's Lifeline training and passing a Company issued exam. The training will be updated as needed, and will be reviewed no less frequently than every ninety (90) days. Further, Global Connection employs a dedicated compliance officer to oversee training and compliance matters for its wireless and wireline Lifeline service offerings.

One-Per-Household Certification. Global Connection has implemented the requirements of the 2012 Lifeline Reform Order to ensure that it provides only one Lifeline benefit per household⁵²

⁵⁰ With the limited exception of states that have opted out of the NLAD. In those states, Global Connection will query the state duplicates database.

⁵¹ See 2012 Lifeline Reform Order ¶ 203. The Company transmits to the NLAD the information required for each new Lifeline subscriber. See *id.*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, the Company updates each subscriber's information in the NLAD within ten (10) business days of any change, except for de-enrollment, which will be transmitted within one business day. See 47 C.F.R. § 54.404(b)(8),(10). These statements are not applicable in states that have opted out of the NLAD.

⁵² A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An

through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for the Company's Lifeline service, the Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁵³ If so, and the applicant lives at an address with multiple households, the Company will require the applicant to complete and submit a written document based on a USAC form containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁵⁴

Marketing Materials. The Company includes the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household; (6) that

"economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. *See* 2012 Lifeline Reform Order ¶ 74; section 54.400(h).

⁵³ *See* 2012 Lifeline Reform Order ¶ 78.

⁵⁴ *Id.* Samples of Global Connection's one-per-household worksheet are attached as **Exhibit C**. The USAC Household Worksheet is available at http://www.usac.org/res/documents/li/pdf/forms/LI_Worksheet_nonNVstates.pdf. (Global Connection understands and will comply with the requirement to utilize the USAC standard application/certification form, which includes income eligibility information, by July 1, 2018. *See* Lifeline Form Public Notice.)

documentation is necessary for enrollment; and (7) Global Connection's name (the ETC).⁵⁵ These statements are included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application/certification forms.⁵⁶ This specifically includes the Company's website for its wireless service (www.StandUpWireless.com) or wireline service (www.ConnectWithGlobal.com) as well as outdoor signage.⁵⁷ Samples of the Company's marketing materials are included as **Exhibit D**. In addition, the Company's application/certification forms will state that 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.

G. Company Reimbursements from the Fund

To ensure that Global Connection does not seek reimbursement from the Fund without a subscriber's consent, the Company certifies, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁸ Further, the Company will comply with the Commission's requirement to use a first day of the month uniform snapshot date to request reimbursement from USAC for the provision

⁵⁵ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁶ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁷ See 2012 Lifeline Reform Order ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁸ See 2012 Lifeline Reform Order ¶ 128; 47 C.F.R. § 54.407(d).

of Lifeline support.⁵⁹ In addition, the Company will keep accurate records as directed by USAC⁶⁰ and as required by section 54.417 of the Commission's rules.

H. Annual Company Certifications

The Company submits an annual FCC Form 481 filing to the Commission by July 1st of each year, providing the Company's business and affiliate information, terms and conditions of any voice telephony plans offered to Lifeline subscribers, and all other required information and certifications.⁶¹ The Company also submits an annual Form 555 filing to the Commission certifying, under penalty of perjury, that the Company: (1) has policies and procedures in place to ensure that its Lifeline subscribers are eligible to receive Lifeline services; (2) that the Company is in compliance with all federal Lifeline certification procedures; and (3) that the Company is in compliance with the minimum service levels set forth in 47 C.F.R. §54.408.⁶² The Company provides the results of its re-certification efforts, performed pursuant to section 54.410(f) of the Commission's rules, as amended, annually by January 31st, for its re-certification efforts of the previous year.⁶³

⁵⁹ See 47 C.F.R. § 54.407(a). Global Connection notes, however, that a number of ETCs filed a Petition for Reconsideration regarding the snapshot, which remains pending with the Commission. See *Wireless ETC Petitioners' Petition for Reconsideration and Clarification*, WC Docket Nos. 11-42, 09-197, 10-90 (filed Aug. 13, 2015).

⁶⁰ See 47 C.F.R. § 54.407(e).

⁶¹ See 47 C.F.R. § 54.422.

⁶² See 47 C.F.R. § 54.416(a).

⁶³ See 47 C.F.R. § 54.416(b).

II. Description of Lifeline Service Offerings⁶⁴

Global Connection will offer its prepaid wireless and wireline Lifeline service in the study areas in the states where it is designated as an ETC⁶⁵ and throughout the coverage area of its respective, underlying provider(s). Global Connection’s Lifeline-supported services will meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408.

Global Connection has revised its Lifeline plans as of December 1, 2017 to comply with the applicable minimum standards set by the Commission. The Company’s current wireless Lifeline offering consists of the following plan options:

Plan Name¹	Voice Minutes Included in Plan	SMS Messages Included in Plan	Data MB Included in Plan	Voicemail Caller ID Call Waiting	Nationwide Long Distance Included	Cost Per Month
StandUP 1 GB Data	500	Unlimited ²	1 GB	YES	YES	Free
StandUP Basic	750	Unlimited ²	100 MB	YES	YES	Free

* 1 Text = 1 Minute

¹ Plan availability based on subscriber’s state of residence; not available in CA or NE. Visit www.StandUPwireless.com or call 1-800-544-4441 for more information.

² Stated pricing for service options do not include applicable state, federal and local taxes and surcharges.

In addition to allotments of voice, text and broadband services, Global Connection’s current wireless Lifeline offering includes a free handset and access to custom calling features at no charge, including Caller ID, Call Waiting, and Voicemail. All wireless Lifeline plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. Lifeline customers can purchase additional bundles of minutes, currently in the following increments:

⁶⁴ See Compliance Plan Public Notice at 3.

⁶⁵ Global Connection is currently designated as a wireline ETC in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas.

Direct Payment Retail Price	Total Credits Provided	Credits per Nationwide Call Minute	Credits per SMS Text Message
\$5	200	1	1
\$10	450	1	1
\$20	1000	1	1
\$30	1500	1	1
\$50	2500	1	1

Additional Data Plans	Total MB Credits Provided
\$3.95	250 MB
\$7.95	500 MB
\$15.95	1 GB

Airtime “top-up” minutes are available for purchase through customer service and on its website. Additional information regarding the Company’s wireless Lifeline plans, rates and services can be found on its website www.StandUpWireless.com.

The Company’s wireline Lifeline offerings vary based on the Company’s underlying provider. Global Connection resells AT&T service in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and offers a Lifeline-discounted Basic Package⁶⁶ for \$20.70,⁶⁷ an Advantage Package⁶⁸ for \$25.70 and a Premium Package⁶⁹ for \$30.70 to eligible Lifeline customers. Global Connection resells CenturyLink and Level 3 service in Alabama, Arkansas, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁰ for \$32.95 and an Advantage Package⁷¹ for \$49.95 to eligible Lifeline customers. The Company resells Windstream service in Florida, Georgia and North

⁶⁶ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁶⁷ That rate, and all rates provided in this section, reflect the Lifeline discount.

⁶⁸ The Advantage Package adds the following to the Basic Package: Caller ID, Call Waiting and 100 minutes of domestic long distance.

⁶⁹ The Premium Package adds the following to the Advantage Package: Three-Way Calling, Call forwarding, Repeat Dial, Call Selector, Call Block and Call Return.

⁷⁰ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷¹ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

Carolina, and offers a Lifeline-discounted Basic Package⁷² for \$36.70 and an Advantage Package⁷³ for \$46.70 to eligible Lifeline customers. Finally, Global Connection resells Verizon and Frontier West services in Alabama, Florida, Michigan and North Carolina, and offers a Lifeline-discounted Basic Package⁷⁴ for \$36.70 and an Advantage Package⁷⁵ for \$46.70 to eligible Lifeline customers. Global Connection has resale agreements with each of these underlying providers for local exchange services. For example, Global Connection purchases Local Wholesale Complete services (UNE) from AT&T.

Customers of any wireline service package can purchase 250 domestic long-distance minutes for \$5.00 or unlimited domestic long-distance for \$10.00. Additional information regarding the Company's plans, rates and services can be found on its website www.ConnectWithGlobal.com.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷⁶

Financial and Technical Capabilities. Section 54.202(a)(4), 47 C.F.R. § 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷⁷ Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

⁷² The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷³ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁴ The Basic Package includes unlimited local calling, 911 and a published phone number.

⁷⁵ The Advantage Package adds the following to the Basic Package: Caller ID and Call Waiting.

⁷⁶ See Compliance Plan Public Notice at 3.

⁷⁷ See 2012 Lifeline Reform Order ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

Global Connection has been offering non-Lifeline and Lifeline wireline service since 1998 and began providing non-Lifeline and Lifeline-supported wireless service in April 2011. The Company generates substantial revenues from non-Lifeline services which represent the majority of its wireline customers. Consequently, to date, Global Connection has not relied (and does not rely) exclusively on Lifeline reimbursement for the Company's operating revenues. In addition, Global Connection has access to capital from its investors. Currently, through its interests in Global Holdings, the majority investor in Global Connection is Milestone Partners, a Pennsylvania private equity firm. Further, as explained below, financial support will continue to be available to Global Connection through the new majority ownership proposed for the Company.

Pursuant to the terms of a Stock Purchase Agreement ("Agreement") dated February 16, 2017, by and among Odin Mobile, Global Holdings and Global Connection, Odin Mobile will acquire seventy five percent (75%) of the stock in Global Connection, which will become its majority-owned direct subsidiary. A majority (ninety-nine percent (99%) interest in Odin Mobile (and thus, the majority indirect interest in Global Connection) will be held post-close by Paul Greene, a U.S. citizen. Global Holdings will retain twenty five percent (25%) ownership of Global Connection.⁷⁸ Global Connection customers will continue to receive their existing services at the same or better rates, terms and conditions currently in effect.

Odin Mobile (FRN: 0022135131) is a Maryland limited liability company with its principal offices located at 11565 Old Georgetown Road, Rockville, Maryland 20852. Odin Mobile provides prepaid wireless service, including to visually impaired consumers by using the T-Mobile USA ("T-Mobile") and Sprint wireless networks through the Mobile Virtual Network Enabler ("MVNE") Prepaid Wireless Wholesale, LLC ("PPWW"), which is owned by Paul Greene. Odin Mobile

⁷⁸ The transaction will not result in any change to the ownership of Global Holdings or Odin Mobile.

purchases wireless services (for voice minutes, text messages, mobile data, etc.) from PPWW, a Maryland limited liability company, on a wholesale basis, packages those services into Odin Mobile's own service plans and pricing, and bundles the wireless service with Odin Mobile's handset selection, mobile applications, marketing materials, web interface, and customer service to produce finished wireless service offerings to sell to end-user customers. Odin Mobile currently provides wireless service in 49 states and Puerto Rico.⁷⁹ Odin Mobile and its affiliates have established considerable financial resources that will be available, as needed, to support Global Connection in its operations and continuing growth. Upon approval of the transaction, Odin Mobile will own 75% of Global Connection and plans to transfer all prepaid wireless operations to Global Connection.

Paul Greene is also indirectly a majority owner (the only 10% or greater owner) of Prepaid Wireless Group, LLC ("PWG"), an MVNE that supplies airtime through the T-Mobile network. PWG, a Maryland limited liability corporation, holds the wholesale agreements with T-Mobile and the technology that connects the two networks. Mr. Greene is also indirectly a majority owner (the only 10% or greater owner) of PPWW, which is the exclusive sales and distribution partner for PWG services to the Mobile Virtual Network Operator ("MVNO") market. PWG and PPWW have no foreign ownership and, like Global Connection, are not foreign carriers and are not affiliated with foreign carriers in any market. PWG is one of the nation's longest standing aggregators of wireless services. PWG is financially strong, carrying zero debt or outside investment. PWG participates in the National Lifeline Association to lobby for favorable rules and regulations that promote longevity and stability of the program.

⁷⁹ The only state in which Odin Mobile does not offer service is Alaska.

PWG provides integrated communications solutions - including MVNO enablement, cellular carrier access aggregation, voice/text/data services, and machine-to-machine (“M2M”) and Internet of Things (“IoT”) connectivity. PWG provides services to PPWW. Through the exclusive sales and marketing relationships, PPWW helps companies deploy mobile services to their customers. These MVNOs market and sell while PPWW provides backend network connectivity, billing, rating, and other enablement services necessary to execute their business objectives.

PWG owns and operates a carrier grade voice, text, and mobile data telecommunications infrastructure. These carrier-connected network elements are the hub of PWG and PPWW’s business. When voice, text, or data events are initiated, those events are passed to PWG’s network for event approval, dynamic call routing, live event rating, billing, and reporting. PWG has a long-term contractual and network relationship with T-Mobile. Specifically, PWG network elements are inter-connected with T-Mobile and T-Mobile leverages PWG as an MVNO, M2M, and IoT aggregator. Specifically, PWG’s network infrastructure and T-Mobile relationship enables PWG to leverage equipment, connectivity, software, and expertise from each partner to deliver a complete telecommunication solution.

PWG and PPWW have completed the strategic planning, development, and deployment of all hardware, software, and programming integration necessary to deliver carrier-grade telecommunication enablement services to the U.S. MVNO market. The systems represent a bidirectional hub between the carrier and each wholesale partner. PWG published and manages a robust API architecture enabling real-time activations, customer management functions, and billing record delivery. This architecture allows PPWW to fully integrate into the carrier’s ordering API platform. All wholesale partners integrate directly with PPWW.

PWG's network is fully-redundant. This includes power, circuits, hardware, and network connections, and the network delivers 99.999% uptime and reliability. PWG has deployed disaster recovery mechanisms that ensure talk, text, and data services remain available. PPWW systems are built for rapid deployment and support of wholesale clients. Operational support includes API integration, customer activations, rate plan management, customer life-cycle messaging, equipment warehouse and fulfillment, 24/7 call center services and Tier 2 technical support. In addition, PPWW maintains subject matter, development, and innovation experts to engage and retain wholesale partners and subscribers.

In addition to PWG and PPWW, Mr. Greene also owns X Wireless, which manufactures and distributes wireless devices, and Consumer Network Services, a commercial property holding company.⁸⁰ Mr. Greene holds 90% or more ownership interest in these companies. Both companies are based in Maryland.

With respect to technical expertise, Global Connection has demonstrated its capabilities over eighteen years of operations, now providing service pursuant to wireline and wireless ETC designations in a combined twenty-nine (29) jurisdictions. The Company has considerable experience complying with the requirements of the federal Lifeline program. Global Connection has hired Eric Schimpf as its Chief Operating Officer and Jennifer Carter as its Compliance Officer. Mr. Schimpf was the Vice President and General Manager of Lifeline operations for FreedomPop. He was instrumental in the Lifeline growth for i-wireless working to secure 34 state ETC designations. In addition, Mr. Schimpf spent 20 years at Cincinnati Bell working in wireline and wireless operations. He served the company as the General Manager of Cincinnati Bell Wireless, where he managed prepaid and postpaid wireless services for the regional carrier. Ms. Carter has

⁸⁰ Mr. Greene also owns interest in several other non-communications-related businesses.

held compliance roles for two wireless Lifeline ETCs and most recently was the Director of Compliance at FreedomPop. Ms. Carter performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company. As a result, the transaction will bring together the full strength of Global Connection's history and management team capabilities, and Paul Greene and additional team members' business expertise. The resulting synergy will enable Global Connection to achieve measurable growth at the same time as it develops improved operating efficiencies, both necessary components for the Company to thrive.

Finally, the Company has not been subject to enforcement sanctions related to the Low Income Fund or ETC revocation proceedings in any state. The Company did enter into a Consent Order with the Georgia Public Service Commission on December 13, 2010 during the course of Global Connection's application for wireline ETC status in Georgia, relating to the inclusion of a surcharge on bills to collect from customers contributions to the Georgia Universal Access Fund, and charging customers a late fee and a processing fee for switching carriers or terminating service, in a manner inconsistent with its tariff.⁸¹ Global Connection agreed to pay a civil penalty in the amount of \$55,000 and its ETC application was ultimately granted by the Georgia Public Service Commission on February 22, 2011.

Service Requirements Applicable to the Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁸² Global Connection certifies that it will comply with the service requirements applicable to the support the Company receives.⁸³ Global Connection's Lifeline

⁸¹ See *Order Adopting Consent Order*, Docket No. 9322, Document No. 133041 (Dec. 22, 2010), included as **Exhibit E**.

⁸² Compliance Plan Public Notice at 3.

⁸³ See 47 C.F.R. § 54.202(a)(1).

supported voice services will meet the minimum service standards set forth in 47 C.F.R. § 54.408, including as such standards are updated on an annual basis. Global Connection's Lifeline supported broadband services will also meet the minimum service standards set forth in 47 C.F.R. § 54.408 for mobile broadband internet access services, including for service speed and data usage allowance, as such standards are updated on an annual basis. To the extent Global Connection provides devices for use with Lifeline-supported broadband service, such devices will meet the equipment requirements set forth in 47 C.F.R. § 54.408(f), and Global Connection will not impose an additional or separate tethering charge for mobile data usage below the minimum standard.

The Company provides all of the communications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. The Company's services include broadband Internet access service ("BIAS"), a supported service as of December 2, 2016, as well as voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, the Company's wireless service offerings included in Section II *supra* provide its customers with a set number of minutes of use at no charge to the customer, and can be used for local and domestic toll service. The Company's wireline service offerings included in Section II *supra* provide its customers with unlimited minutes for local service, and can be used for local and domestic toll service.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compliance. As discussed above, the Company will comply with the Commission's applicable forbearance grant conditions relating to the provision of 911 and E911 services and handsets (when applicable).

Finally, Global Connection will not provide toll limitation service (“TLS”) for its wireless service offering, which allows low-income consumers to avoid unexpected toll charges. The Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the 2012 Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁸⁴

The Company’s Lifeline wireline offerings include unlimited local calling and plans include prepaid long distance minutes. All wireline customers can purchase additional domestic long distance – unlimited for \$10.00, or 250 minutes for \$5.00. Wireline customers are not permitted to make long distance calls beyond the minutes prepaid. Therefore, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes because customers are not permitted to exceed their long distance minutes. Global Connection’s long distance vendor monitors and controls long-distance usage by end users and blocks long distance calling if the customer has not prepaid for such service.

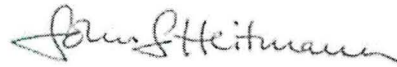
IV. Conclusion

Global Connection submits that its Compliance Plan, as revised, fully satisfies the conditions set forth in the Compliance Plan Public Notice and the Lifeline rules. Timely approval of this amended Compliance Plan is essential to allow Global Connection to consummate the ownership change as described herein, and demonstrably strengthen the Company’s operating capabilities to

⁸⁴ See 2012 Lifeline Reform Order ¶ 230.

the direct benefit of its Lifeline customers. Accordingly, the Company respectfully requests that the Commission expeditiously approve the revisions to its Compliance Plan.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan
Jennifer R. Wainwright
Kelley Drye & Warren LLP
3050 K Street, NW, Suite 400
Washington, DC 20007
(202) 342-8400

*Attorneys for Global Connection Inc. of
America*

April 16, 2018

EXHIBIT 3

Coverage Area

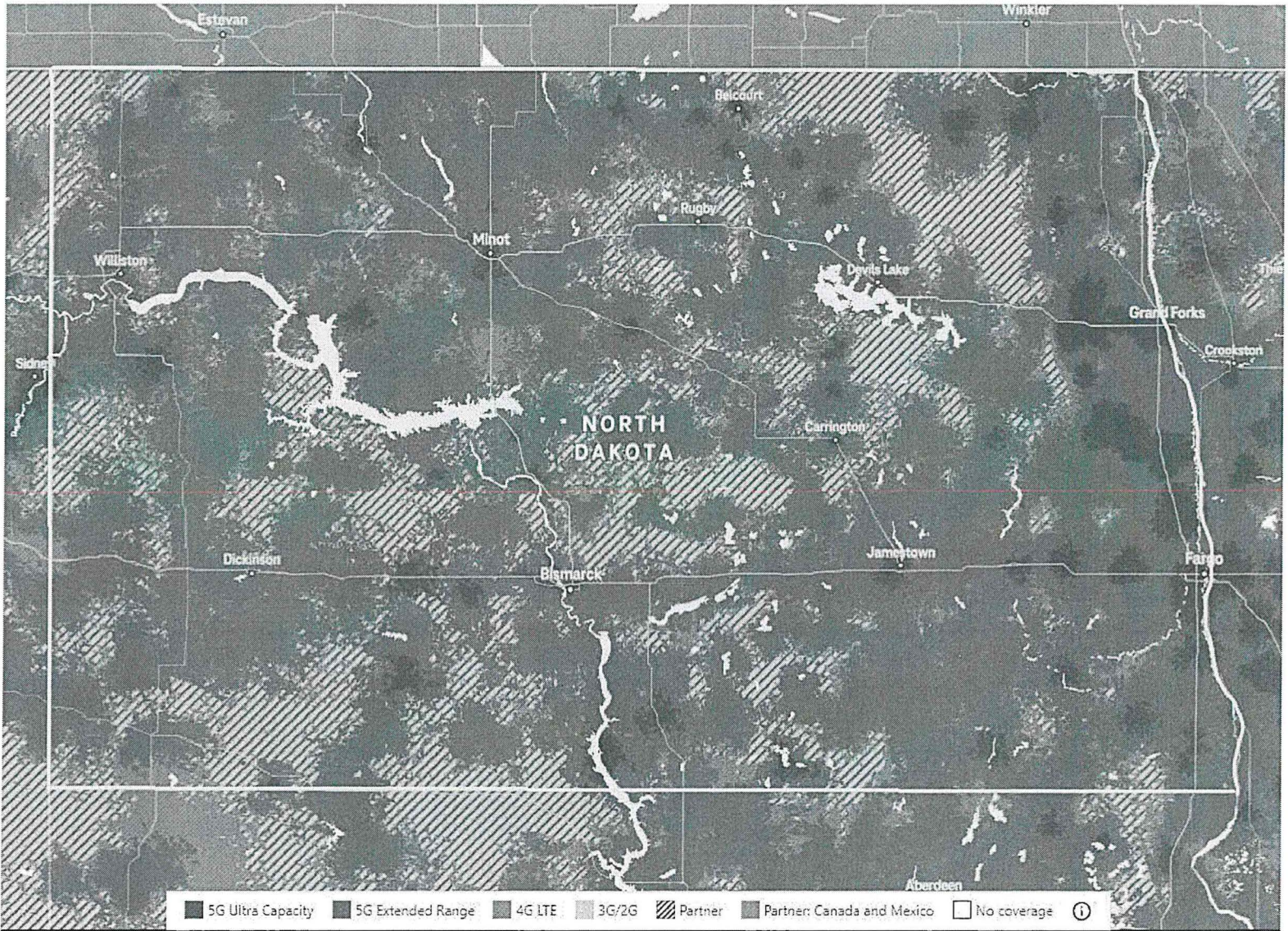


EXHIBIT 4

Key Management Bios

Jennifer Carter currently serves as STANDUPS's Chief Operating Officer and Chief Compliance Officer. Prior to this role, she served as STANDUP's Vice-President of Customer Operations and Compliance Officer. Ms. Carter has held compliance roles for two wireless Lifeline ETCs and, before moving to her role at STANDUP in 2018, was the Director of Compliance at FreedomPop where she performed the function of Chief Compliance Officer, Security Officer and Data Protection Officer for the company.

Jason VanArsdall serves as STANDUP's Vice President of Product Development and Government Relations. Mr. VanArsdall actively serves on the National Lifeline Association's Regulatory and Governmental Affairs Committee and champions the interests of Lifeline and the Affordable Connectivity Program at the Federal and State levels. Prior to STANDUP, Mr. VanArsdall held roles in product management for another wireless Lifeline ETC and at Cincinnati Bell. Mr. VanArsdall is a graduate of the University of Dayton with a Bachelor of Science in Business Administration.

EXHIBIT 5

Proposed Lifeline Offering

STANDUP WIRELESS LIFELINE OFFERING

STANDUP WIRELESS LIFELINE PLANS	VOICE	TEXT (SMS)	DATA High Speed	LIFELINE PRICE
Lifeline-Only Broadband	1,000	Unlimited	4.5 GB	\$0.00
Lifeline-Only Tribal	Unlimited	Unlimited	6.5 GB	\$0.00 (Tribal only)

ADDITIONAL AIRTIME "TOP-UPS"	VOICE	TEXT (SMS)	DATA
\$5.00	250	250	250 MB
\$10.00	None	None	1.5 GB
\$10.00	Unlimited	Unlimited	1 GB
\$20.00	Unlimited	Unlimited	3 GB
\$30.00	Unlimited	Unlimited	8 GB

Top-Ups expire after 30 days

All packages include:

- Free calls to STANDUP Customer Service
- Free calls to 611 services
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra cost
- Free SIM Card

EXHIBIT 6

Sample Advertisement



1,000 Minutes, Unlimited Texts with 4.5 GB High-Speed Data

Bring Your Own Phone Number • Runs on the strongest 5G LTE Network

Qualify by participation in one of these programs:

Medicaid • SNAP • SSI • Section 8 • Veterans Pension • Qualify by Income • Other Programs May Apply

SEE IF YOU QUALIFY, APPLY TODAY! standupwireless.com/printad

Unresolved questions or complaints may be directed to your local Public Utilities Commission or customers in the states listed below may direct

unresolved questions or complaints to the following organizations: • Colorado Public Utilities Commission: Consumer Affairs – 800-456-0858, 303-894-8070 • Georgia Public Service Commission: Consumer Affairs – 800-282-5813, 404-656-4501 • Pennsylvania Utility Commission Bureau of Consumer Services – 800-692-7380 or for FDD PA Relay Center 800-682-8706 (voice) or 800-682-8786 (TTY) • Kansas Commission's Office of Public Affairs and Consumer Protection – 800-662-0027 or 785-271-3140, TD 800-766-3777 • Massachusetts Consumer Divisions Department of Telecommunications & Cable – 800- 800- 392-6066 or 617-305-3531 • Washington: Washington State Office of Attorney General, Consumer Protection Division at 1-800-551-4636 or 206-464-6684 or <https://www.atg.wa.gov/consumer-protection>

This is a Lifeline supported service. Lifeline is a government assistance program. Only eligible consumers may enroll. Eligibility is based on income or participation in certain government benefit programs and is determined by the National Verifier (documentation may be required). You must be eligible to be enrolled in Lifeline. Lifeline benefits are non-transferable and limited to one per household (wireless or wireline). Customers who willfully make false statements in order to obtain the Lifeline benefit can be punished by fine, imprisonment, or being barred from the program. Plans include a minimum of 1,000 Minutes, Unlimited Text, and 4.5 GB of Data. Offers vary by state and service may not be available in all states or areas. Service provided by Global Connection Inc. of America d/b/a StandUp Wireless. Visit www.standupwireless.com for Lifeline eligibility criteria and applicable terms & conditions. 05/2024

EXHIBIT 7

**Articles of Incorporation along with a Certificate of Authority from the
North Dakota Secretary of State**

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

CERTIFIED COPY

I, **Brad Raffensperger**, the Secretary of State of the State of Georgia, do hereby certify under the seal of my office that the attached documents are true and correct copies of documents filed with the Corporations Division of the Office of the Secretary of State of Georgia under the name of

GLOBAL CONNECTION INC. OF AMERICA

a Domestic Profit Corporation

This certificate is issued pursuant to Title 14 of the Official Code of Georgia Annotated and is prima-facie evidence of the existence or nonexistence of the facts stated herein.

Docket Number : 27671172
Date Inc/Auth/Filed: 06/01/1998
Jurisdiction : Georgia
Print Date : 06/12/2024
Form Number : 215



Brad Raffensperger

Brad Raffensperger
Secretary of State

Secretary of State
Corporations Division
Suite 315, West Tower
2 Martin Luther King Jr., Dr.
Atlanta, Georgia 30334-1530

CONTROL NUMBER: 9821083
EFFECTIVE DATE: 06/01/1998
COUNTY : DEKALB
REFERENCE : 0047
PRINT DATE : 06/03/1998
FORM NUMBER : 311

SAM ABDALLAH
3783 PRESIDENTIAL PKWY
SUITE 117
ATLANTA GA 30340

CERTIFICATE OF INCORPORATION

I, Lewis A. Massey, the Secretary of State and the Corporation Commissioner of the State of Georgia, do hereby certify under the seal of my office that

**GLOBAL CONNECTION INC. OF AMERICA
A DOMESTIC PROFIT CORPORATION**

has been duly incorporated under the laws of the State of Georgia on the effective date stated above by the filing of articles of incorporation in the office of the Secretary of State and by the paying of fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on the date set forth above.



Lewis A. Massey
LEWIS A. MASSEY
SECRETARY OF STATE

ARTICLES OF INCORPORATION

GLOBAL CONNECTION INC. OF AMERICA

ARTICLE I - NAME

The name of this Corporation is

GLOBAL CONNECTION INC. OF AMERICA

ARTICLE II - CAPITAL SHARES AUTHORIZED

The number of shares the corporation is authorized to issue is Five Thousand (5,000) of Common stock having a par value of One Dollar (\$1.00) each.

ARTICLE III - REGISTERED OFFICE

The street address of the initial registered office of the corporation is 3783 Presidential Pkwy., Suite 117, Atlanta, Georgia 30340, DeKalb County, Georgia, and the name of the initial registered agent of the corporation at such address is SAM ABDALLAH.

ARTICLE IV - INCORPORATOR

The name and address of the incorporator is:

**SAM ABDALLAH
3783 Presidential Pkwy., Suite 117
ATLANTA, GEORGIA 30340**

ARTICLE V - PRINCIPAL OFFICE

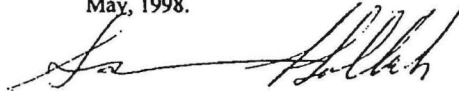
The mailing address of the initial principal office of the corporation is 3783 Presidential Pkwy., Suite 117, Atlanta, Georgia 30340

ARTICLE VI - INITIAL DIRECTORS AND OFFICERS

The names and address of the initial Directors and Officers are:

**SAM ABDALLAH, Director & President
3783 Presidential Pkwy., Suite 117, Atlanta, Georgia 30340**

IN WITNESS WHEREOF, the undersigned has executed these Articles of Incorporation this 15th day of May, 1998.



**SAM ABDALLAH
Incorporator & Registered Agent**



LEWIS A. MASSEY
Secretary of State

OFFICE OF SECRETARY OF STATE
CORPORATIONS DIVISION
Suite 315, West Tower, 2 Martin Luther King Jr., Drive
Atlanta, Georgia 30334-1530
(404) 656-2817

CATHY COX
Assistant Secretary of State -
Operations

TRANSMITTAL INFORMATION
NEW GEORGIA PROFIT OR NONPROFIT CORPORATIONS

WARREN H. RARY
Director

DO NOT WRITE IN SHADED AREA - SOS USE ONLY

DOCKET #	991530534	PENDING CONTROL #	P231440	CONTROL #	9821083
Docket Code	311	Corporation Type	DP		
Date Filed	6/1/98	Amount Received \$	60	Check/Receipt #	4346
Jurisdiction (County) Code	44 DeKalb				
Examiner	47	Date Completed			

NOTICE TO APPLICANT: PRINT PLAINLY OR TYPE REMAINDER OF THIS FORM.

1.	981341233	08/12/1998
	Corporate Name Reservation Number	Reservation Expiration Date
	GLOBAL CONNECTION INC. OF AMERICA	
	Corporate Name	
2.	SAM ABDALLAH	770-452-0066
	Applicant/Attorney	Telephone Number
	3783 PRESIDENTIAL PKWY, SUITE 117	
	Address	
	ATLANTA	30340
	City	State Zip Code
3.	NOTICE: THIS FORM DOES NOT REPLACE THE ARTICLES OF INCORPORATION. MAIL OR DELIVER DOCUMENTS AND THE SECRETARY OF STATE FILING FEE TO THE ABOVE ADDRESS. DOCUMENTS SHOULD BE SUBMITTED IN THE FOLLOWING ORDER. (A COVER LETTER IS NOT REQUIRED.)	
	1. This Transmittal Form.	
	2. The original and one copy of the Articles of Incorporation.	
	3. A filing fee of \$60.00 payable to Secretary of State. Filing fees are non-refundable.	
	NOTE: DO NOT submit this form if you are changing the name of an existing corporation.	
	I understand that the information on this form will be entered in the Secretary of State business registration database. I certify that a Notice of Incorporation or a Notice of Intent to Incorporate with a publishing fee of \$40.00 has been or will be mailed or delivered to the authorized newspaper as required by law.	
		5-15-98
	Authorized Signature	Date
	Registered agent, officer, entity status information is available on the internet. VISIT US ON THE INTERNET AT THE ADDRESS LISTED BELOW.	
	http://www.sos.state.ga.us	

9821093

06/01/1998

GLOBAL CONNECTION INC. OF AMERICA

Secretary of State

Corporations Division
Suite 315, West Tower
2 Martin Luther King Jr., Dr.
Atlanta, Georgia 30334-1530

CONTROL NUMBER: 9821083
EFFECTIVE DATE: 06/01/1998
COUNTY : DEKALB
REFERENCE : 0047
PRINT DATE : 06/03/1998
FORM NUMBER : 311

SAM ABDALLAH
3783 PRESIDENTIAL PKWY
SUITE 117
ATLANTA GA 30340

CERTIFICATE OF INCORPORATION

I, Lewis A. Massey, the Secretary of State and the Corporation Commissioner of the State of Georgia, do hereby certify under the seal of my office that

GLOBAL CONNECTION INC. OF AMERICA A DOMESTIC PROFIT CORPORATION

has been duly incorporated under the laws of the State of Georgia on the effective date stated above by the filing of articles of incorporation in the office of the Secretary of State and by the paying of fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on the date set forth above.

Lewis A. Massey
LEWIS A. MASSEY
SECRETARY OF STATE



**ARTICLES OF INCORPORATION
GLOBAL CONNECTION INC. OF AMERICA**

ARTICLE I - NAME

The name of this Corporation is

GLOBAL CONNECTION INC. OF AMERICA

ARTICLE II - CAPITAL SHARES AUTHORIZED

The number of shares the corporation is authorized to issue is Five Thousand (5,000) of Common stock having a par value of One Dollar (\$1.00) each.

ARTICLE III - REGISTERED OFFICE

The street address of the initial registered office of the corporation is 3783 Presidential Pkwy., Suite 117, Atlanta, Georgia 30340, DeKalb County, Georgia, and the name of the initial registered agent of the corporation at such address is SAM ABDALLAH.

ARTICLE IV - INCORPORATOR

The name and address of the incorporator is:

**SAM ABDALLAH
3783 Presidential Pkwy., Suite 117
ATLANTA, GEORGIA 30340**

ARTICLE V - PRINCIPAL OFFICE

The mailing address of the initial principal office of the corporation is 3783 Presidential Pkwy., Suite 117, Atlanta, Georgia 30340

ARTICLE VI - INITIAL DIRECTORS AND OFFICERS

The names and address of the initial Directors and Officers are:

**SAM ABDALLAH, Director & President
3783 Presidential Pkwy., Suite 117, Atlanta, Georgia 30340**

IN WITNESS WHEREOF, the undersigned has executed these Articles of Incorporation this 15th day of May, 1998.



**SAM ABDALLAH
Incorporator & Registered Agent**

BSP (4)
MAY 15 1998
SECRETARY OF STATE

GLOBAL CONNECTION INC. OF AMERICA

3783 Presidential Pkwy., Suite 117

Atlanta, Georgia 30340

May 13, 1998

LEWIS MASSEY
SECRETARY OF STATE
ATTENTION: WARREN H. RARY, DIRECTOR
BUSINESS SERVICES AND REGULATION
STATE OF GEORGIA
Suite 315, West Tower
2 Martin Luther King Jr. Drive
Atlanta, Georgia 30334

In Re: GLOBAL CONNECTION INC. OF AMERICA

Dear Sirs:

Enclosed are the following:

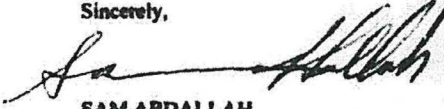
Original and one copy of the Articles of Incorporation
(FOR PROFIT under Section 14-2-101 O.C.G.A.)

BSR Form 227 Transmittal Info - GA Corporations

Check for \$60.00 payable to the Secretary of State.

Please return the certified copy to our corporate mailing address. If additional information is necessary,
you may contact me at telephone (770) 452-0066 or write me at the office address above.

Sincerely,



SAM ABDALLAH
Incorporator & Registered Agent



LEWIS A. MASSEY
Secretary of State

OFFICE OF SECRETARY OF STATE
CORPORATIONS DIVISION
Suite 318, West Tower, 2 Martin Luther King Jr., Drive
Atlanta, Georgia 30334-1530
(404) 656-2617

CATHY COX
Assistant Secretary of State -
Operations

TRANSMITTAL INFORMATION
NEW GEORGIA PROFIT OR NONPROFIT CORPORATIONS

WARREN H. RAY
Director

DO NOT WRITE IN SHADED AREA - SOS USE ONLY

DOCKET #	<u>991530534</u>	FILING CONTROL #	<u>0231440</u>	CONTROL #	<u>9821003</u>
Docket Code	<u>311</u>	Corporation Type	<u>DP</u>		
Date Filed	<u>6/1/98</u>	Amount Received \$	<u>60</u>	Check/Receipt #	<u>4346</u>
Jurisdiction (County) Code	<u>44 DeKalb</u>				
Examiner	<u>47</u>	Date Completed			

NOTICE TO APPLICANT: PRINT PLAINLY OR TYPE REMAINDER OF THIS FORM.

1.	<u>981341233</u>	<u>08/12/1998</u>
	Corporate Name Reservation Number	Reservation Expiration Date
	<u>GLOBAL CONNECTION INC. OF AMERICA</u>	
	Corporate Name	
2.	<u>SAM ABDALLAH</u>	<u>770-452-0066</u>
	Applicant/Attorney	Telephone Number
	<u>3783 PRESIDENTIAL PKWY, SUITE 007</u>	
	Address	
	<u>ATLANTA</u>	<u>30340</u>
	City	Zip Code
	<u>GEORGIA</u>	
	State	

3. NOTICE: THIS FORM DOES NOT REPLACE THE ARTICLES OF INCORPORATION. MAIL OR DELIVER DOCUMENTS AND THE SECRETARY OF STATE FILING FEE TO THE ABOVE ADDRESS. DOCUMENTS SHOULD BE SUBMITTED IN THE FOLLOWING ORDER. (A COVER LETTER IS NOT REQUIRED.)

1. This Transmittal Form.
2. The original and one copy of the Articles of Incorporation.
3. A filing fee of \$60.00 payable to Secretary of State. Filing fees are non-refundable.

NOTE: DO NOT submit this form if you are changing the name of an existing corporation.

I understand that the information on this form will be entered in the Secretary of State business registration database. I certify that a Notice of Incorporation or a Notice of Intent to Incorporate with a publishing fee of \$40.00 has been or will be mailed or delivered to the authorized newspaper as required by law.

[Signature]
Authorized Signature

5-15-98
Date

Registered agent, officer, entity status information is available on the internet.
VISIT US ON THE INTERNET AT THE ADDRESS LISTED BELOW.

<http://www.sos.state.ga.us>

CORPORATION NAME

ADDRESS

CITY

STATE

ZIP

GLOBAL CONNECTION INC. OF AMERICA	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CEO: SAM ABDALLAH	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CFO: SAM ABDALLAH	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
SEC: HUNTER J. HAMILTON	P O BOX 675313	MARIETTA	GA	30006
AGT: HUNTER J. HAMILTON	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340

IF ABOVE INFORMATION HAS CHANGED, TYPE OR PRINT CORRECTIONS BELOW:

CORPORATION ADDR:				
CEO:				
CFO:				
3957 PLEASANTDALE RD ATLANTA GA 30340				
SEC: RACHAEL (OPOLAM) 907 DAYLIGHT CIRCLE LAWRENCE GA				
P.O BOX NOT ACCEPTABLE				
AGT:				
GA				

I HEREBY CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.

AUTHORIZED SIGNATURE:  DATE: 7/03/01

TITLE: Agent PHONE # 770 419 0460

* Enter correction here ->

COUNTY OF

REGISTERED OFFICE:

DEKALB

COUNTY

CHANGE OR CORRECTION:

BR201 (12-00) 2001 CORPORATION ANNUAL REGISTRATION

FEE: \$15.00 GA 06/01/1998 DP K821083



01K821083001500GLOBALCONNECTIONINCO



STATE OF GEORGIA

2007 Corporation Annual Registration

Control No: K821083
Date Filed: 02/12/2007 01:00 PM
Karen C Handel
Secretary of State

OFFICE OF SECRETARY OF STATE

Annual Registration Filings

P.O. Box 23038

Columbus, Georgia 31902-3038

Karen C Handel
Secretary of State

Entity Control No. K821083

Information on record as of: 2/12/2007

GLOBAL CONNECTION INC. OF AMERICA
3957 PLEASANTDALE RD
ATLANTA GA, 30340-4259

Amount due from this entity is indicated below. Annual fee is \$30. If amount is more than \$30, total reflects amount(s) due from previous year(s). Renew by April 1, 2007

Renew at www.georgiacorporations.org or by submitting bottom portion with check payable to "Secretary of State".

Officer, address and agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer and Secretary of the corporation. Please PRINT LEGIBLY.

Note: Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Box may be used for principal office and officers.

Any person authorized by the entity to do so may sign and file registration (including online filing).

Please return ONLY the original form below and fee. Other filings and correspondence should be sent to our Atlanta address: Corporations Division, 315 West Tower, #2 Martin Luther King Jr. Drive, Atlanta, GA 30334.

Visit www.georgiacorporations.org to file online or for more information on annual registration. Or, call 404-656-2817.

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

Table with 5 columns: CORPORATION NAME, ADDRESS, CITY, STATE, ZIP. Rows include: GLOBAL CONNECTION INC. OF AMERICA, CEO: SAM ABDALLAH, CFO: SAM ABDALLAH, SEC: RACHELLE COPELAND, AGT: RACHELLE COPELAND. Includes a section for corrections and a signature block.

BR203 2007 Corporation Annual Registration

Amount Due: \$30.00



STATE OF GEORGIA

2008 Corporation Annual Registration

Control No: K821083
Date Filed: 02/27/2008 11:54 AM
Karen C Handel
Secretary of State

OFFICE OF SECRETARY OF STATE

Annual Registration Filings

P.O. Box 23038

Columbus, Georgia 31902-3038

Karen C Handel
Secretary of State

Entity Control No. K821083

Information on record as of: 2/27/2008

GLOBAL CONNECTION INC. OF AMERICA
3957 PLEASANTDALE RD
ATLANTA GA, 30340-4259

Amount due from this entity is indicated below. Annual fee is \$30. If amount is more than \$30, total reflects amount(s) due from previous year(s). Renew by April 1, 2008

Renew at www.georgiacorporations.org or by submitting bottom portion with check payable to "Secretary of State".

Officer, address and agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer and Secretary of the corporation. Please PRINT LEGIBLY.

Note: Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Box may be used for principal office and officers.

Any person authorized by the entity to do so may sign and file registration (including online filing).

Please return ONLY the original form below and fee. Other filings and correspondence should be sent to our Atlanta address: Corporations Division, 315 West Tower, #2 Martin Luther King Jr. Drive, Atlanta, GA 30334.

Visit www.georgiacorporations.org to file online or for more information on annual registration. Or, call 404-656-2817.

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

Table with columns: CORPORATION NAME, ADDRESS, CITY, STATE, ZIP. Rows include: GLOBAL CONNECTION INC. OF AMERICA, CEO: SAM ABDALLAH, CFO: SAM ABDALLAH, SEC: RACHELLE COPELAND, AGT: RACHELLE COPELAND. Includes a section for corrections and a signature block.

BR203 2008 Corporation Annual Registration

Amount Due: \$30.00



Karen C Handel
Secretary of State

STATE OF GEORGIA
2008 Corporation Annual Registration

Control No: K821083
Date Filed: 08/26/2008 09:45 AM
Karen C Handel
Secretary of State

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Entity Control No. K821083

Information on record as of: 8/26/2008

GLOBAL CONNECTION INC. OF AMERICA
3957 PLEASANTDALE RD
ATLANTA GA, 30340-4259

Amount due from this entity is indicated below. Annual fee is \$30. If amount is more than \$30, total reflects amount(s) due from previous year(s). **Renew by April 1, 2008**

Renew at www.georgiacorporations.org or by submitting bottom portion with check payable to "Secretary of State".

Officer, address and agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer and Secretary of the corporation. Please PRINT LEGIBLY.

Note: Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Box may be used for principal office and officers.

Any person authorized by the entity to do so may sign and file registration (including online filing).

Please return ONLY the original form below and fee. Other filings and correspondence should be sent to our Atlanta address: Corporations Division, 315 West Tower, #2 Martin Luther King Jr. Drive, Atlanta, GA 30334.

Visit www.georgiacorporations.org to file online or for more information on annual registration. Or, call 404-656-2817.

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	3957 PLEASANTDALE RD	ATLANTA	GA	30340
CEO: SAM ABDALLAH	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CFO: SAM ABDALLAH	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
SEC: RACHELLE COPELAND	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
AGT: RACHELLE COPELAND	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
IF ABOVE INFORMATION HAS CHANGED, TYPE OR PRINT CORRECTIONS BELOW:				
Corporation Addr:				
CEO:				
CFO:				
SEC:				
AGT: Dan Lonergan	3957 Pleasantdale Road	Atlanta	GA	30340
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.		COUNTY OF REGISTERED OFFICE:	COUNTY CHANGE OR CORRECTION:	
AUTHORIZED SIGNATURE: Angela Briggs		DEKALB	Appling	
TITLE: Filer		DATE: 8/26/2008		

BR203 2008 Corporation Annual Registration

Amount Due: **\$30.00**

082 K82108324 0030004 GLOBALCONNECTIONINC06



Karen C Handel
Secretary of State

STATE OF GEORGIA
2008 Corporation Annual Registration

Control No: K821083
Date Filed: 09/02/2008 07:46 PM
Karen C Handel
Secretary of State

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Entity Control No. K821083

Information on record as of: 9/2/2008

GLOBAL CONNECTION INC. OF AMERICA
3957 PLEASANTDALE RD
ATLANTA GA, 30340-4259

Amount due from this entity is indicated below. Annual fee is \$30. If amount is more than \$30, total reflects amount(s) due from previous year(s). **Renew by April 1, 2008**

Renew at www.georgiacorporations.org or by submitting bottom portion with check payable to "Secretary of State".

Officer, address and agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer and Secretary of the corporation. Please PRINT LEGIBLY.

Note: Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Box may be used for principal office and officers.

Any person authorized by the entity to do so may sign and file registration (including online filing).

Please return ONLY the original form below and fee. Other filings and correspondence should be sent to our Atlanta address: Corporations Division, 315 West Tower, #2 Martin Luther King Jr. Drive, Atlanta, GA 30334.

Visit www.georgiacorporations.org to file online or for more information on annual registration. Or, call 404-656-2817.

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	3957 PLEASANTDALE RD	ATLANTA	GA	30340
CEO: SAM ABDALLAH	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CFO: SAM ABDALLAH	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
SEC: RACHELLE COPELAND	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
AGT: Lonergan, Dan	3957 Pleasantdale Road	Atlanta	GA	30340
IF ABOVE INFORMATION HAS CHANGED, TYPE OR PRINT CORRECTIONS BELOW:				
Corporation Addr:				
CEO: Mark Gagne	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CFO: Mark Gagne	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
SEC: Dan Lonergan	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
AGT:	P.O. BOX NOT ACCEPTABLE			GA
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT. AUTHORIZED SIGNATURE: Julie Thompson TITLE: Filer		COUNTY OF REGISTERED OFFICE: Appling		COUNTY CHANGE OR CORRECTION:

BR203 2008 Corporation Annual Registration

Amount Due: **\$30.00**

082 K82108324 0030004 GLOBALCONNECTIONINC06



Karen C Handel
Secretary of State

STATE OF GEORGIA
2008 Corporation Annual Registration

Control No: K821083
Date Filed: 09/11/2008 01:32 PM
Karen C Handel
Secretary of State

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Entity Control No. K821083

Information on record as of: 9/11/2008

GLOBAL CONNECTION INC. OF AMERICA
3957 PLEASANTDALE RD
ATLANTA GA, 30340-4259

Amount due from this entity is indicated below. Annual fee is \$30. If amount is more than \$30, total reflects amount(s) due from previous year(s). **Renew by April 1, 2008**

Renew at www.georgiacorporations.org or by submitting bottom portion with check payable to "Secretary of State".

Officer, address and agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer and Secretary of the corporation. Please PRINT LEGIBLY.

Note: Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Box may be used for principal office and officers.

Any person authorized by the entity to do so may sign and file registration (including online filing).

Please return ONLY the original form below and fee. Other filings and correspondence should be sent to our Atlanta address: Corporations Division, 315 West Tower, #2 Martin Luther King Jr. Drive, Atlanta, GA 30334.

Visit www.georgiacorporations.org to file online or for more information on annual registration. Or, call 404-656-2817.

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	3957 PLEASANTDALE RD	ATLANTA	GA	30340
CEO: Mark Gagne	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CFO: Mark Gagne	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
SEC: Dan Lonergan	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
AGT: Lonergan, Dan	3957 Plesantdale Road	Atlanta	GA	30340
IF ABOVE INFORMATION HAS CHANGED, TYPE OR PRINT CORRECTIONS BELOW:				
Corporation Addr:				
CEO: HOUSSAM ABDALLAH	3957 PLEASANTDALE RD	ATLANTA	GA	30340
CFO:				
SEC:				
AGT:	P.O. BOX NOT ACCEPTABLE			GA
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.		COUNTY OF REGISTERED OFFICE:	COUNTY CHANGE OR CORRECTION:	
AUTHORIZED SIGNATURE: HOUSSAM ABDALLAH		Appling		
DATE: 9/11/2008				
TITLE: Filer				

BR203 2008 Corporation Annual Registration

Amount Due: **\$30.00**



STATE OF GEORGIA

2009 Corporation Annual Registration

Control No: K821083
Date Filed: 02/18/2009 12:38 PM
Karen C Handel
Secretary of State

Karen C Handel
Secretary of State

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Chauncey R. Newsome
Director

Entity Control No. K821083

Information on record as of: 2/18/2009

GLOBAL CONNECTION INC. OF AMERICA
3957 PLEASANTDALE RD
ATLANTA GA, 30340-4259

Amount due from this entity is indicated below. Annual fee is \$30. If amount is more than \$30, total reflects amount(s) due from previous year(s). Renew by April 1, 2009

Renew at www.georgiacorporations.org or by submitting bottom portion with check payable to "Secretary of State".

Officer, address and agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer and Secretary of the corporation. Please PRINT LEGIBLY.

Note: Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Box may be used for principal office and officers.

Any person authorized by the entity to do so may sign and file registration (including online filing).

Please return ONLY the original form below and fee. Other filings and correspondence should be sent to our Atlanta address: Corporations Division, 315 West Tower, #2 Martin Luther King Jr. Drive, Atlanta, GA 30334.

Visit www.georgiacorporations.org to file online or for more information on annual registration. Or, call 404-656-2817.

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

Table with columns: CORPORATION NAME, ADDRESS, CITY, STATE, ZIP. Rows include: GLOBAL CONNECTION INC. OF AMERICA, CEO: HOUSSAM ABDALLAH, CFO: Mark Gagne, SEC: Dan Lonergan, AGT: Lonergan, Dan. Includes a section for corrections and a signature block.

BR203 2009 Corporation Annual Registration

Amount Due: \$30.00



Brian P. Kemp
Secretary of State

STATE OF GEORGIA
2010 Corporation Annual Registration

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Control No: K821083
Date Filed: 03/02/2010 04:15 PM
Brian P. Kemp
Secretary of State

Chauncey Newsome
Director

Information on record as of: 3/2/2010

Entity Control No. K821083 Amount Due: \$30.00 Amount Due AFTER April 1, 2010: \$55.00

GLOBAL CONNECTION INC. OF AMERICA
5555 Oakbrook Parkway, Suite 620
Norcross GA, 30093

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$30. If amount is more than \$30, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). **Renew by April 1, 2010.** Your Annual Registration must be postmarked by April 1, 2010. If your registration and payment are not postmarked by April 1, 2010, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at www.georgiacorporations.org. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. **We cannot accept cash for payment.**

You may mail your registration in by submitting the bottom portion of this remittance with a check or money order payable to "Secretary of State". **All checks must be pre-printed with a complete address in order to be accepted by our offices for your filing. Absolutely, no counter or starter checks will be accepted. Failure to adhere to these guidelines will delay or possibly reject your filing.** Checks that are dishonored by your bank are subject to a \$30.00 NSF charge. Failure to honor your payment could result in a civil suit filed against you and/or your entity may be Administratively Dissolved by the Secretary of State. [See O.C.G.A. § 13-6-15 and Title 14, respectively.]

Officer, address and Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer, and Secretary of the corporation.

Note: Registered Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Boxes may be used for principal office and officers' addresses.

Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

Please return **ONLY** the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit www.georgiacorporations.org. Or, call 404-656-2817. **PLEASE PRINT LEGIBLY.**

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	3957 PLEASANTDALE RD	ATLANTA	GA	30340
CEO: Mark Gagne	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
CFO: Mark Gagne	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
SEC Dan Lonergan	3957 PLEASANTDALE ROAD	ATLANTA	GA	30340
AGT Lonergan, Dan	3957 Plesantdale Road	Atlanta	GA	30340
IF ABOVE INFORMATION HAS CHANGES, TYPE OR PRINT CORRECTIONS BELOW:				
CORPORATION ADDRESS:	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CEO: Mark R. Ellis	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CFO: Mark R. Ellis	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
SEC: Dan Lonergan	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
AGT: Angela Briggs	5555 Oakbrook Parkway Suite 620	Norcross	GA	30093
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	<i>P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS</i>	COUNTY OF REGISTERED OFFICE: Appling	COUNTY CHANGE OR CORRECTION: Gwinnett	
AUTHORIZED SIGNATURE: Angela Briggs	DATE: 3/2/2010 4		Total Due:	
TITLE: Filer	EMAIL:			\$30.00



Brian P. Kemp
Secretary of State

STATE OF GEORGIA
2011 Corporation Annual Registration

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Control No: K821083
Date Filed: 02/28/2011 11:23 AM
Brian P. Kemp
Secretary of State

Chauncey Newsome
Director

Information on record as of: 2/28/2011

Entity Control No. K821083 Amount Due: \$50.00 Amount Due AFTER April 1, 2011: \$75.00

GLOBAL CONNECTION INC. OF AMERICA
5555 Oakbrook Parkway, Suite 620
Norcross, GA 30093

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$50. If amount is more than \$50, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). **Renew by April 1, 2011.** Your Annual Registration must be postmarked by April 1, 2011. If your registration and payment are not postmarked by April 1, 2011, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at www.georgiacorporations.org. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. **We cannot accept cash for payment.**

You may mail your registration in by submitting the bottom portion of this remittance with a check or money order payable to "Secretary of State". **All checks must be pre-printed with a complete address in order to be accepted by our offices for your filing. Absolutely, no counter or starter checks will be accepted. Failure to adhere to these guidelines will delay or possibly reject your filing.** Checks that are dishonored by your bank are subject to a \$30.00 NSF charge. Failure to honor your payment could result in a civil suit filed against you and/or your entity may be Administratively Dissolved by the Secretary of State. [See O.C.G.A. § 13-6-15 and Title 14, respectively.]

Officer, address and Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer, and Secretary of the corporation.

Note: Registered Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Boxes may be used for principal office and officers' addresses.

Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

Please return ONLY the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit www.georgiacorporations.org. Or, call 404-656-2817. **PLEASE PRINT LEGIBLY.**

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CEO: Mark R. Ellis	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CFO: Mark R. Ellis	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
SEC: Dan Lonergan	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
AGT: Briggs, Angela	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
IF ABOVE INFORMATION HAS CHANGES, TYPE OR PRINT CORRECTIONS BELOW:				
CORPORATION ADDRESS:				
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
AGT:			GA	
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	<i>P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS</i>		COUNTY OF REGISTERED OFFICE: Gwinnett	COUNTY CHANGE OR CORRECTION:
AUTHORIZED SIGNATURE: Angela Briggs	DATE: 2/28/2011		Total Due:	
TITLE: Filer	EMAIL: abriggs@globalconnectioninc.com		\$50.00	

BR201 2011 Corporation Annual Registration

117 K8210834 0050009 GLOBALCONNECTIONINC06 201104018 0050009



Brian P. Kemp
Secretary of State

STATE OF GEORGIA
2012 Corporation Annual Registration

OFFICE OF SECRETARY OF STATE
Annual Registration Filings
P.O. Box 23038
Columbus, Georgia 31902-3038

Control No: K821083
Date Filed: 03/26/2012 11:26 AM
Brian P. Kemp
Secretary of State

Information on record as of: 3/26/2012

Entity Control No. K821083 **Amount Due: \$50.00** **Amount Due AFTER April 1, 2012: \$75.00**

GLOBAL CONNECTION INC. OF AMERICA
5555 Oakbrook Parkway, Suite 620
Norcross, GA 30093

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$50. If amount is more than \$50, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). **Renew by April 1, 2012.** Your Annual Registration must be postmarked by April 1, 2012. If your registration and payment are not postmarked by April 1, 2012, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at www.georgiacorporations.org. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. **We cannot accept cash for payment.**

You may mail your registration in by submitting the bottom portion of this remittance with a check or money order payable to "Secretary of State". **All checks must be pre-printed with a complete address in order to be accepted by our offices for your filing. Absolutely, no counter or starter checks will be accepted. Failure to adhere to these guidelines will delay or possibly reject your filing.** Checks that are dishonored by your bank are subject to a \$30.00 NSF charge. Failure to honor your payment could result in a civil suit filed against you and/or your entity may be Administratively Dissolved by the Secretary of State. [See O.C.G.A. § 13-6-15 and Title 14, respectively.]

Officer, address and Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer, and Secretary of the corporation.

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Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

Please return **ONLY** the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit www.georgiacorporations.org. Or, call 404-656-2817. **PLEASE PRINT LEGIBLY.**

Current information printed below. Review and update as needed. Detach original coupon and return with payment.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
AGT: Briggs, Angela	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
IF ABOVE INFORMATION HAS CHANGES, TYPE OR PRINT CORRECTIONS BELOW:				
CORPORATION ADDRESS:				
CEO:				
CFO:				
SEC:				
AGT:			GA	
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	<i>P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS</i>	COUNTY OF REGISTERED OFFICE: Gwinnett	COUNTY CHANGE OR CORRECTION:	
AUTHORIZED SIGNATURE: Angela Briggs		DATE: 3/26/2012	Total Due:	
TITLE: Filer	EMAIL: abriggs@globalconnectioninc.com		\$50.00	

BR201 2012 Corporation Annual Registration

126 K82108324 0050009 GLOBALCONNECTIONINC06 201204017 0050009



Brian P. Kemp
Secretary of State

STATE OF GEORGIA
2013 Corporation Annual Registration

OFFICE OF THE SECRETARY OF STATE
Annual Registration Filing
P.O. Box 23038
Columbus, Georgia 31902-3038

Information on record as of: 11:03:45 AM

Entity Control No. K821083

Amount Due: \$50.00

Amount Due AFTER April 1, 2013: \$75.00

GLOBALCONNECTIONINCOFAMERICA INC.
5555 Oakbrook Parkway, Suite 620
Norcross, Georgia 30093

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$50. If amount is more than \$50, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). **Renew by April 1, 2013** Your Annual Registration must be postmarked by April 1, 2013. If your registration and payment are not postmarked by April 1, 2013, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at <http://www.sos.ga.gov/corporations/>. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. **We cannot accept cash for payment.**

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Officer, address and Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer, and Secretary of the corporation.

Note: Registered Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Boxes may be used for principal office and officers' addresses.

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Please return **ONLY** the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit <http://www.sos.ga.gov/corporations/>. Or, call 404-656-2817.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093

THE ABOVE INFORMATION HAS BEEN UPDATED TO:

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBALCONNECTIONINCOFAMERICA INC.	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093

AGT: Briggs, Angela	5555 Oakbrook Parkway, Suite 620 Norcross, GA 30093	Norcross	Georgia	30093
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS	COUNTY OF REGISTERED OFFICE:	Gwinnett County	
AUTHORIZED SIGNATURE: Angela Briggs	Date: 3/13/2013 11:03:24 AM		Total Due:	
Title: Other	Email: abriggs@gcioa.com	\$50.00		

BR201 2013 Corporation Annual Registration

135 K821083Z4 0050009 GLOBALCONNECTIONINCOE 201304016 0075000



Brian P. Kemp
Secretary of State

STATE OF GEORGIA
2014 Corporation Annual Registration

Secretary of State
Control No.: K821083
Date Filed:4/1/2014 11:50:29 AM

OFFICE OF THE SECRETARY OF STATE
Annual Registration Filing
P.O. Box 23038
Columbus, Georgia 31902-3038

Information on record as of: 11:50:31 AM

Entity Control No. K821083

Amount Due: \$50.00

Amount Due AFTER June 1, 2014: \$75.00

GLOBAL CONNECTION INC. OF AMERICA
5555 Oakbrook Parkway, Suite 620
Norcross, Georgia 30096

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$50. If amount is more than \$50, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). Renew by April 1, 2013 Your Annual Registration must be postmarked by June 1, 2014. If your registration and payment are not postmarked by June 1, 2014, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at <http://www.sos.ga.gov/corporations/>. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. We cannot accept cash for payment.

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Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

Please return ONLY the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit <http://www.sos.ga.gov/corporations/> Or, call 404-656-2817.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBALCONNECTIONINCOFAMERICA	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30093
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30093

THE ABOVE INFORMATION HAS BEEN UPDATED TO:

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096

AGT: Briggs, Angela	5555 Oakbrook Parkway, Suite 620 Norcross, GA 30093	Norcross	Georgia	30096
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS	COUNTY OF REGISTERED OFFICE:	Gwinnett County	
AUTHORIZED SIGNATURE: ED SMITH	Date:4/1/2014 11:50:29 AM		Total Due:	
Title:Secretary	Email: JRILEY@TELECOMPLIANCE.NET		\$50.00	

BR201 2013 Corporation Annual Registration

144 K8210834 0050009 GLOBALCONNECTIONINCO6 201406013 0075000



Brian P. Kemp
Secretary of State

STATE OF GEORGIA
2015 Corporation Annual Registration

Secretary of State
Control No.: K821083
Date Filed: 4/3/2015 1:09:20 PM

OFFICE OF THE SECRETARY OF STATE
Annual Registration Filing
P.O. Box 23038
Columbus, Georgia 31902-3038

Information on record as of: 1:09:22 PM

Entity Control No.: K821083

Amount Due: \$75.00

Amount Due AFTER April 1, 2015: \$75.00

GLOBAL CONNECTION INC. OF AMERICA
5555 Oakbrook Parkway, Suite 620
Norcross, Georgia 30096

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$50. If amount is more than \$50, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). **Renew by April 1, 2015** Your Annual Registration must be postmarked by April 1, 2015. If your registration and payment are not postmarked by April 1, 2015, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at <http://www.sos.ga.gov/corporations/>. The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. **We cannot accept cash for payment.**

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Officer, address and Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer, and Secretary of the corporation.

Note: Registered Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Boxes may be used for principal office and officers' addresses.

Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

Please return **ONLY** the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit <http://www.sos.ga.gov/corporations/>. Or, call 404-656-2817.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	5555 Oakbrook Parkway, Suite 620	Norcross	GA	30096
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096

THE ABOVE INFORMATION HAS BEEN UPDATED TO:

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
GLOBAL CONNECTION INC. OF AMERICA	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
CEO: David Skogen	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
CFO: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096
SEC: Ed Smith	5555 Oakbrook Parkway, Suite 620	Norcross	Georgia	30096

AGT: Briggs, Angela	5555 Oakbrook Parkway, Suite 620 Norcross, GA 30093	Norcross	Georgia	30096
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS	COUNTY OF REGISTERED OFFICE:	Gwinnett County	

153 K82108324 0050009 GLOBALCONNECTIONINC06 201504014 0075000

153 K82108324 0050009 GLOBALCONNECTIONINC06 201504014 0075000

AUTHORIZED SIGNATURE: ED SMITH	Date:4/3/2015 1:09:20 PM	Total Due:
Title:Secretary	Email: JRILEY@TELECOMPLIANCE.NET	\$75.00

BR201 2015 Corporation Annual Registration

153 K82108324 0050009 GLOBALCONNECTIONINC06 201504014 0075000

153 K82108374 0050009 GLOBALCONNECTIONINC06 201504014 0075000

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

ANNUAL REGISTRATION

Electronically Filed

Secretary of State

Filing Date: 4/13/2016 9:47:54 AM

BUSINESS INFORMATION

CONTROL NUMBER	K821083
BUSINESS NAME	GLOBAL CONNECTION INC. OF AMERICA
BUSINESS TYPE	Domestic Profit Corporation
EFFECTIVE DATE	04/13/2016

PRINCIPAL OFFICE ADDRESS

ADDRESS 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

REGISTERED AGENT'S NAME AND ADDRESS

NAME	ADDRESS
Briggs, Angela	5555 Oakbrook Parkway, Suite 620 Norcross, GA 30093, Gwinnett, Norcross, GA, 30096, USA

OFFICERS INFORMATION

NAME	TITLE	ADDRESS
David Skogen	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	SECRETARY	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE	DAVID SGOGEN
AUTHORIZER TITLE	Officer



A handwritten signature in black ink, appearing to read 'B. P. Kemp'.

Brian P. Kemp
Secretary of State



Brian P. Kemp
Secretary of State

OFFICE OF SECRETARY OF STATE
CORPORATIONS DIVISION
2 Martin Luther King Jr. Dr. SE
Suite 313 West Tower
Atlanta, Georgia 30334
(404) 656-2817

RECEIVED
SECRETARY OF STATE
INTAKE DIVISION

2016 SEP -1 PM 1:17

**AMENDED ANNUAL REGISTRATION
FOR CORPORATION**

Note: In order to use this amended annual registration form, an annual registration must have already been filed for the corporation in this calendar year. Amended annual registration filing fee is \$20.00.

1. Entity Information:

Entity Name: GLOBAL CONNECTION INC. OF AMERICA

Entity Control Number: K821083

Entity Type (check one only):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Domestic Profit Corporation | <input type="checkbox"/> Foreign Profit Corporation |
| <input type="checkbox"/> Domestic Nonprofit Corporation | <input type="checkbox"/> Foreign Nonprofit Corporation |
| <input type="checkbox"/> Domestic Professional Corporation | <input type="checkbox"/> Foreign Professional Corporation |

2. Current street address and county of registered office:

Address: 5555 OAKBROOK PARKWAY

City: NORCROSS County: USA State: GA Zip Code: 30093

3. Name of current registered agent: Angela Briggs

4. If applicable, new street address and county of registered office:

Address: _____

City: _____ County: _____ State: GA Zip Code: _____

5. If applicable, name of new registered agent: Dee DiCicco

Email address of new registered agent: ddicicco@gcioa.com

6. If applicable, new mailing address of entity's principal office:

Address: _____

City: _____ State: _____ Zip Code: _____

7. If applicable, the names and respective addresses of its officers are updated as follows:

	NAME	ADDRESS	STATE	ZIP CODE
CEO				
CFO				
SEC				

8. After the above change(s) are made, the address of the entity's registered office and the business address of the registered agent will be identical.

9. I hereby certify, under penalty of law, that the above information is true and correct.

[Signature]
Signature of Authorized Person

8/23/16
Date

David Skogen
Print Name

CEO
Title

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/31/2017 12:15:03

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : DEE DICICCO
REGISTERED OFFICE ADDRESS : 5555 OAKBROOK PARKWAY, Gwinnett, NORCROSS, GA, 30093, USA

OFFICER	TITLE	ADDRESS
David Skogen	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : DEE DICICCO
REGISTERED OFFICE ADDRESS : 5555 OAKBROOK PARKWAY, Gwinnett, NORCROSS, GA, 30093, USA

OFFICER	TITLE	ADDRESS
David Skogen	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : SUSAN COCKERHAM
AUTHORIZER TITLE : Attorney In Fact

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/19/2018 00:08:54

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : DEE DICICCO
REGISTERED OFFICE ADDRESS : 5555 OAKBROOK PARKWAY, Gwinnett, NORCROSS, GA, 30093, USA

OFFICER	TITLE	ADDRESS
Ed Smith	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
David Skogen	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Ed Smith	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, , Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : Jennifer Carter
REGISTERED OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Gwinnett, Norcross, GA, 30093, USA

OFFICER	TITLE	ADDRESS
Eric Schimpf, COO	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
John Walden	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Eric Schimpf	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : Susan Cockerham
AUTHORIZER TITLE : Attorney In Fact

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

ANNUAL REGISTRATION

Electronically Filed

Secretary of State

Filing Date: 1/28/2019 2:22:28 PM

BUSINESS INFORMATION

CONTROL NUMBER	K821083
BUSINESS NAME	GLOBAL CONNECTION INC. OF AMERICA
BUSINESS TYPE	Domestic Profit Corporation
EFFECTIVE DATE	01/28/2019

PRINCIPAL OFFICE ADDRESS

ADDRESS 5555 Oakbrook Parkway, , Suite 620, Norcross, GA, 30093, USA

REGISTERED AGENT

NAME	ADDRESS	COUNTY
Jennifer Carter	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA	Gwinnett

OFFICERS INFORMATION

NAME	TITLE	ADDRESS
Eric Schimpf	SECRETARY	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Eric Schimpf, COO	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
John Walden	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE	Douglas McDaniel
AUTHORIZER TITLE	Director

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/18/2020 13:08:19

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation
ANNUAL REGISTRATION PERIOD : 2020

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, , Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : Jennifer Carter
REGISTERED OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
Eric Schimpf	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Eric Schimpf, COO	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
John Walden	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : Jennifer Carter
REGISTERED OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
Eric Schimpf	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Eric Schimpf, COO	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
John Walden	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : JENNIFER RABIG
AUTHORIZER TITLE : Authorized Person

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/25/2021 18:37:30

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation
ANNUAL REGISTRATION PERIOD : 2021

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED AGENT NAME : Jennifer Carter
REGISTERED OFFICE ADDRESS : 5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
Eric Schimpf	Secretary	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
Eric Schimpf, COO	CEO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA
John Walden	CFO	5555 Oakbrook Parkway, Suite 620, Norcross, GA, 30093, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : CORPORATION SERVICE COMPANY
REGISTERED OFFICE ADDRESS : 40 TECHNOLOGY PARKWAY SOUTH, SUITE #300, NORCROSS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	Secretary	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	CEO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : JENNIFER RABIG
AUTHORIZER TITLE : Authorized Person

**STATEMENT OF CHANGE OF ADDRESS
OF REGISTERED OFFICE**

Electronically Filed
Secretary of State
Filing Date: 06/16/2021 17:19:45 PM

REGISTERED AGENT INFORMATION

NAME OF REGISTERED AGENT Corporation Service Company

ENTITY INFORMATION

Multiple entities are involved with this change of address.

NEW STREET ADDRESS AND COUNTY OF REGISTERED OFFICE

REGISTERED OFFICE ADDRESS 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA

REGISTERED OFFICE COUNTY Gwinnett

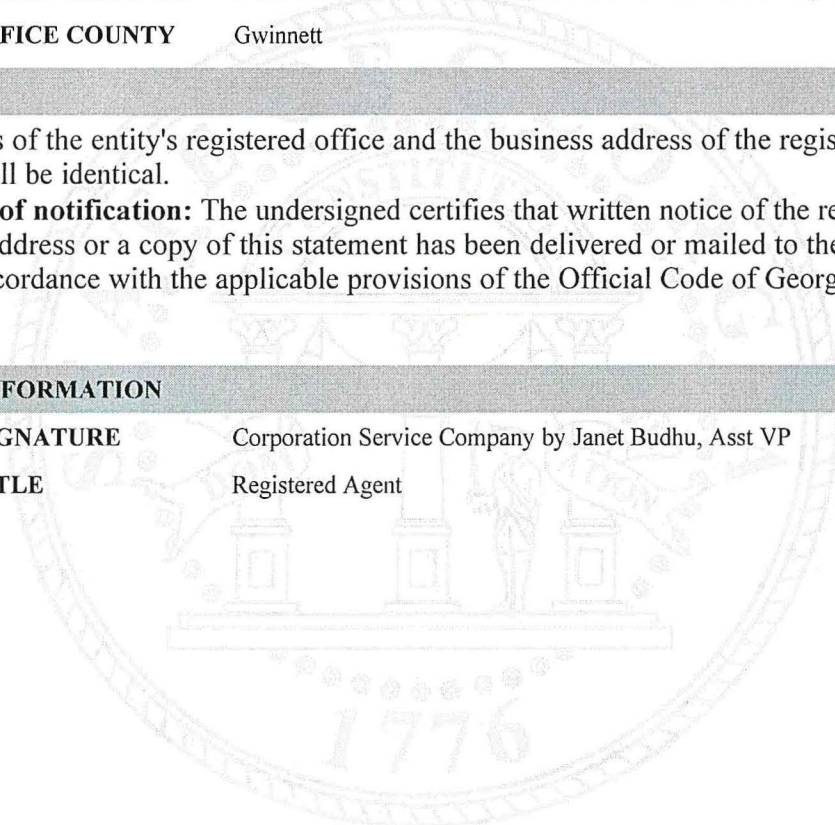
STATEMENTS

- The address of the entity's registered office and the business address of the registered agent, as changed, will be identical.
- **Statement of notification:** The undersigned certifies that written notice of the registered agent's change of address or a copy of this statement has been delivered or mailed to the above-named entity in accordance with the applicable provisions of the Official Code of Georgia Annotated.

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE Corporation Service Company by Janet Budhu, Asst VP

AUTHORIZER TITLE Registered Agent



STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/24/2022 14:40:30

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation
ANNUAL REGISTRATION PERIOD : 2022

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : Eric Schimpf
AUTHORIZER TITLE : Officer

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/30/2023 15:51:51

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation
ANNUAL REGISTRATION PERIOD : 2023

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : Eric Schimpf
AUTHORIZER TITLE : Officer

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Annual Registration

Electronically Filed

Secretary of State

Filing Date: 03/13/2024 16:47:10

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation
ANNUAL REGISTRATION PERIOD : 2024

BUSINESS INFORMATION CURRENTLY ON FILE

PRINCIPAL OFFICE ADDRESS : 842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	842 MONMOUTH STREET, NEWPORT, KY, 41071, USA

UPDATES TO ABOVE BUSINESS INFORMATION

PRINCIPAL OFFICE ADDRESS : 847 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	847 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	847 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	847 MONMOUTH STREET, NEWPORT, KY, 41071, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : Eric Schimpf
AUTHORIZER TITLE : Officer

STATE OF GEORGIA

Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

Amended Annual Registration

Electronically Filed

Secretary of State

Filing Date: 5/8/2024 6:36:15 PM

BUSINESS INFORMATION

BUSINESS NAME : GLOBAL CONNECTION INC. OF AMERICA
CONTROL NUMBER : K821083
BUSINESS TYPE : Domestic Profit Corporation
FILING TYPE : Amended Annual Registration

CURRENT INFORMATION ON FILE FOR PRINCIPAL ADDRESS, REGISTERED AGENT, AND OFFICERS

PRINCIPAL OFFICE ADDRESS : 847 MONMOUTH STREET, NEWPORT, KY, 41071, USA
REGISTERED AGENT NAME : Corporation Service Company
REGISTERED OFFICE ADDRESS : 2 SUN COURT, SUITE 400, PEACHTREE CORNERS, GA, 30092, USA
REGISTERED OFFICE COUNTY : Gwinnett

OFFICER	TITLE	ADDRESS
ERIC SCHIMPF	CEO	847 MONMOUTH STREET, NEWPORT, KY, 41071, USA
ERIC SCHIMPF	Secretary	847 MONMOUTH STREET, NEWPORT, KY, 41071, USA
John Walden	CFO	847 MONMOUTH STREET, NEWPORT, KY, 41071, USA

CHANGES TO THE ABOVE CURRENT INFORMATION ARE INDICATED BELOW

PRINCIPAL OFFICE ADDRESS : 390 NE 191st St STE 8334, Miami, FL, 33179, USA
REGISTERED AGENT NAME : Registered Agents Inc
REGISTERED OFFICE ADDRESS : 8735 DUNWOODY PLACE, STE R, ATLANTA, GA, 30350, USA
REGISTERED OFFICE COUNTY : Fulton

OFFICER	TITLE	ADDRESS
Paul Green	CEO	390 NE 191st St STE 8334, Miami, FL, 33179, USA
Paul Green	Secretary	390 NE 191st St STE 8334, Miami, FL, 33179, USA
John Walden	CFO	390 NE 191st St STE 8334, Miami, FL, 33179, USA

After the above change(s) are made, the address of the entity's registered office and the business address of the

registered agent will be identical.

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE : Robin Jones

AUTHORIZER TITLE : Authorized Person

State of North Dakota

SECRETARY OF STATE



CERTIFICATE OF AUTHORITY OF

GLOBAL CONNECTION INC. OF AMERICA
Secretary of State ID#: 43,378,700

The undersigned, as Secretary of State of the State of North Dakota, hereby certifies that an application of

GLOBAL CONNECTION INC. OF AMERICA

for a Certificate of Authority to transact business in this State, duly signed and verified pursuant to the provisions of the North Dakota Century Code, have been received in this office and are found to conform to law.

ACCORDINGLY the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Authority to

GLOBAL CONNECTION INC. OF AMERICA

to transact business in this State under the name of

GLOBAL CONNECTION INC. OF AMERICA

Issued: June 19, 2017

A handwritten signature in cursive script, reading "Alvin A. Jaeger".

Alvin A. Jaeger
Secretary of State



CERTIFICATE OF AUTHORITY APPLICATION
FOREIGN CORPORATION
 SECRETARY OF STATE
 SFN 13100 (01-2016)

RECEIVED
JUN 05 2017

For Office Use Only

ID Number:	43,378,700
WO Number:	1535630
Filed:	6-19-17
By:	NIS

SEC. OF STATE

1A. The application **MUST** be accompanied by **ALL** of the following:

Filing fee of \$145 if a **Foreign Business or Professional Corporation** Filing fee of \$50 if a **Foreign Nonprofit Corporation** Current **CERTIFICATE OF GOOD STANDING** or **CERTIFICATE OF EXISTENCE** verifying corporate existence certified by the incorporating officer of the state or country of incorporation

1B. The following **MAY** be required:

Certificate of Professional License from the North Dakota licensing board for the profession Signed Consent to Use Business Name and fee of \$10 Trade Name Registration and fee of \$25

SEE INSTRUCTIONS FOR FEES, FILING, AND MAILING INFORMATION

TYPE OR PRINT LEGIBLY

For reference, see North Dakota Century Code, Section 10-19.1-135 or 10-33-125.

2. Type of corporation applying for certificate of authority (check one)		3B. Federal ID Number	
<input checked="" type="checkbox"/> Foreign Business	<input type="checkbox"/> Foreign Professional	<input type="checkbox"/> Foreign Nonprofit	
3A. Name of corporation EXACTLY as it appears on Certificate of Good Standing or Certificate of Existence from state or country of origin Global Connection Inc. of America		58-2393640	
3C. If applicable, provide the trade name and complete the Trade Name Registration form if. The corporate name in number 3A is not in the form as required of corporations in North Dakota. The Secretary of State has notified the corporation that its corporate name is the same or deceptively similar to a name already registered, and the corporation is unable to obtain consent to use of name from the previous filer or a certified copy of a final decree of a court of competent jurisdiction establishing prior right of this corporation to use of the name in North Dakota. The corporation does not wish to use or protect its corporate name in North Dakota and chooses to use a name other than its corporate name.			
4. Complete mailing address of principal executive office (Street/RR, PO Box, City, State, ZIP+4) Street address MUST be provided; may not be only a post office box. 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093			
5A. State or country where incorporated Georgia	5B. EXACT date incorporated (M/D/Y) June 1, 1998	5C. Duration of corporation (check one) <input checked="" type="checkbox"/> Perpetual <input type="checkbox"/> Other - Specify date: _____	
5D. Telephone Number (678) 741-6200		5E. Toll-Free Telephone Number (877) 511-3009	
6A. Name of commercial registered agent in North Dakota Incorp Services, Inc.		OR	
6B. Name of noncommercial registered agent in North Dakota			
6C. Address of noncommercial registered agent in North Dakota (Street/RR, PO Box, City, State, ZIP+4) Street address MUST be provided; may not be only a post office box.			
7. Nature of business or activities the corporation conducts or intends to conduct in North Dakota Telecommunications services.			
8. OFFICERS AND DIRECTORS OF THE CORPORATION			
	Officer also serves as director	NAME	COMPLETE MAILING ADDRESS Street/RR PO Box City State ZIP+4
PRESIDENT	<input checked="" type="checkbox"/>	David Skogen	5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093
VICE PRESIDENT	<input checked="" type="checkbox"/>	Ed Smith	5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093
SECRETARY	<input type="checkbox"/>	Dee DiCicco	5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093
TREASURER	<input type="checkbox"/>		
DIRECTOR			
DIRECTOR			
9. "I, the undersigned, am a person authorized by the corporation to sign this application, know the contents, and believe the statements to be true. I further authorize the Secretary of State to correct numbers 3A, 5A, 5B, 6A, 6B and 6C if not correctly reflected. I understand that if I make a false statement in this document, I may be subject to criminal penalties."			
Signature 		Date 3-7-17	
10. Name of person to contact about this document Kali Reeves		Email Address info@telecomcounsel.com	Daytime Telephone Number (770) 232-9200

State of North Dakota

SECRETARY OF STATE



Certificate of Registration of StandUp Wireless

SOS Control ID#: 0006708717

The undersigned, as Secretary of State of the state of North Dakota, hereby certifies that a Trade Name Registration for

StandUp Wireless

duly signed pursuant to the provisions of the North Dakota statutes governing a trade name, has been received in this office and is found to conform to law.

ACCORDINGLY, the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Registration of

StandUp Wireless

which is owned by GLOBAL CONNECTION INC. OF AMERICA.

Filed date: June 12, 2024

Expiration date: June 12, 2029

A handwritten signature in cursive script that reads "Michael Howe".

Michael Howe
Secretary of State