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November 27, 2019

**VIA ELECTRONIC DELIVERY**

Public Utility Commission of Oregon  
550 Capitol Street, NE  
Salem, Oregon 97310-1380

Re: i-wireless, LLC (UM 1509) Proposed Changes to Lifeline Offering

To Whom It May Concern:

Due to changes in the Federal Communications Commission's ("FCC") minimum service standards that will take effect December 1, 2019, and pursuant to paragraph 21 of the Stipulation adopted by the Commission in Order No. 15-300, i-wireless, LLC d/b/a Access Wireless ("i-wireless" or the "Company") hereby submits proposed changes to its Lifeline offering as described in the attached Exhibit D, which replaces Exhibit D of the Stipulation and any previous revisions thereto.

Existing Access Wireless customers that do not currently have a Smartphone will remain on their current Voice & OTAP plan with no change in benefits or net cost. Existing Access Wireless customers that *do* have a Smartphone will be moved to the updated Oregon LEGACY Lifeline & OTAP Plan. New customers will receive the Oregon Broadband & OTAP Plan.

The changes to Access Wireless' Lifeline plans described in Exhibit D do not reflect a reduction in benefits or increase in price and are therefore able to take effect ten (10) days from the date of this filing. However, given that the changes result in either no change or increased benefits to the consumer, the Company respectfully requests an effective date of December 1, 2019.

If you have any questions regarding this filing, please do not hesitate to contact me at 770-232-7805 or hkirby@telecomcounsel.com.

Respectfully submitted,

*s/ Heather Kirby*

Heather Kirby  
Regulatory Specialist  
Lance J.M. Steinhart, P.C.  
*Attorneys for i-wireless, LLC*

Attachments

i-wireless, LLC (UM 1509)  
November 27, 2019

**EXHIBIT D**  
**PROPOSED REVISIONS**

Exhibit D - Rate Plans

(Effective December 1, 2019)

	Access Wireless		
	Oregon Voice & OTAP Plan <i>grandfathered *</i>	Oregon LEGACY Lifeline & OTAP Plan**	Oregon Broadband & OTAP Plan
<b>National Plan Voice Minutes</b> (non-rollover)	1,000	1,000	0
<b>OTAP Voice Minutes</b> (non-rollover)	250	250	500
<b>Text</b>	Unlimited	Unlimited	Unlimited
<b>Data</b>	50MB - 500MB	3 GB	3 GB
<b>Additional Airtime</b>	Available with purchase of Top Up Card		

Free Handset	X	X	X
Local Calls	X	X	X
Nationwide Long Distance	X	X	X
Voicemail, Caller ID, Call Waiting	X	X	X
Free 911	X	X	X
Free 611	X	X	X
Balance Inquiries	X	X	X
Text Included	X	X	X
Data Allowance	X	X	X
Participation in Kroger Wireless Rewards Program	X	X	X

<b>Retail Price</b>	n/a	n/a	n/a
<b>Federal Subsidy</b>	\$ 7.25	\$ 9.25	\$ 9.25
<b>OTAP Subsidy</b>	\$ 3.50	\$ 3.50	\$ 3.50
<b>Company Credit</b>	\$ -	\$ -	\$ -
<b>Lifeline Consumer Price</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

\*Grandfathered for existing customers without a smartphone prior to 12/1/19

\*\*Available to existing customers with a smartphone prior to 12/1/19

ACCESS WIRELESS TOP UP CARDS\*\*\*

	\$5 Card	\$10 Card	\$25 Card	\$35 Card	\$50 Card
<b>Purchased Minutes</b>	250	500	Unlimited	Unlimited	Unlimited
<b>Text</b>	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
<b>Data</b>	250 MB	500 MB	2 GB	3 GB	10 GB
<b>Picture Mail</b>	Included	Included	Included	Included	Included

\*\*\* Unlimited minutes and texts expire after 30 days from the date the funds were applied to the account; limited minute and data allotments do not expire.

Exhibit D - Rate Plans

(Effective December 1, 2019)

	Access Wireless		
	Oregon <b>Voice</b> <del>LEGACY Lifeline</del> & OTAP Plan <i>grandfathered</i> *	Oregon <b>LEGACY</b> Lifeline & OTAP Plan**	Oregon Broadband & OTAP Plan
<b>National Plan Voice Minutes</b> (non-rollover)	1,000	1,000	0
<b>OTAP Voice Minutes</b> (non-rollover)	250	250	500
<b>Text</b>	Unlimited	Unlimited	Unlimited
<b>Data</b>	50MB - 500MB	3 GB <del>50 MB</del>	3 <del>2</del> GB
<b>Additional Airtime</b>	Available with purchase of Top Up Card		

Free Handset	X	X	X
Local Calls	X	X	X
Nationwide Long Distance	X	X	X
Voicemail, Caller ID, Call Waiting	X	X	X
Free 911	X	X	X
Free 611	X	X	X
Balance Inquiries	X	X	X
Text Included	X	X	X
Data Allowance	X	X	X
Participation in Kroger Wireless Rewards Program	X	X	X

<b>Retail Price</b>	n/a	n/a	n/a
<b>Federal Subsidy</b>	<del>7.25</del> 9.25	\$ 9.25	\$ 9.25
<b>OTAP Subsidy</b>	\$ 3.50	\$ 3.50	\$ 3.50
<b>Company Credit</b>	\$ -	\$ -	\$ -
<b>Lifeline Consumer Price</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

\* ~~Available only to customers enrolled prior to 12/1/2018.~~

\*Grandfathered for existing customers without a smartphone prior to 12/1/19

\*\*Available to existing customers with a smartphone prior to 12/1/19

ACCESS WIRELESS TOP UP CARDS\*\*\*

	\$5 Card	\$10 Card	\$25 Card	\$35 Card	\$50 Card
<b>Purchased Minutes</b>	250	500	Unlimited	Unlimited	Unlimited
<b>Text</b>	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
<b>Data</b>	250 MB	500 MB	2 GB	3 GB	10 GB
<b>Picture Mail</b>	Included	Included	Included	Included	Included

\*\*\* Unlimited minutes and texts expire after 30 days from the date the funds were applied to the account; limited minute and data allotments do not expire.