

October 12, 2016

**VIA E-FILING**  
**(puc.filingcenter@state.or.us)**Kristi Collins  
Commission Secretary  
Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301Re: **UM 1509** - Improvements to i-wireless, LLC's Oregon Lifeline service offerings

Dear Ms. Collins:

Pursuant to paragraph 21 of the stipulation adopted by the Oregon Public Utility Commission ("Commission") in Order No. 15-300, entered September 29, 2015 in Docket No. UM 1509 ("Stipulation"), i-wireless, LLC d/b/a Access Wireless ("i-wireless" or the "Company") hereby notifies the Commission of planned improvements to its Lifeline offerings in Oregon, as described in the revised **Exhibit D**, attached hereto, which is intended to replace Exhibit D of the Stipulation and any previous revisions thereto. The 750-minute voice plan described in **Exhibit D** reflects only an increase in minutes and other material terms of i-wireless' Lifeline service offerings, and will therefore take effect ten (10) days from the date of this filing, consistent with paragraph 21 of the Stipulation. The broadband plan will become effective on December 2, 2016.

Under the Company's current service offerings for Lifeline customers in Oregon, Oregon Lifeline customers receive, at no cost to the customer, a total of 500 minutes of voice and unlimited text messaging each month. i-wireless is now in the process of making changes to the Company's national rate card in anticipation of the minimum service requirements that will take effect pursuant to the Federal Communications Commission's ("FCC") *Third Report and Order*.<sup>1</sup> The Company's core national Lifeline rate plan will now consist of 500 voice minutes, unlimited text messaging, and 50 megabytes of data per month, at no cost to the customer. In Oregon, i-wireless will provide customers with 250 additional minutes each month, funded by the Oregon Telephone Assistance Program ("OTAP"). As summarized in revised **Exhibit D**, attached hereto, when the OTAP benefit is added to the Company's improved core Lifeline plan,

<sup>1</sup> *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. 00-197, WC Docket No. 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3988, FCC 16-38 (rel. Apr. 27, 2016) ("*Third Report and Order*"), § III.B.2.

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Oregon Lifeline customers will receive 750 voice minutes per month (500 minutes funded by the federal Lifeline benefit, plus 250 minutes funded by the OTAP), unlimited text messaging, and 50 megabytes of data per month – all at no charge to Oregon Lifeline customers.

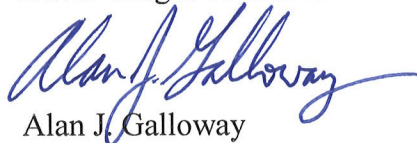
Furthermore, consistent with the *Third Report and Order* and as summarized in revised **Exhibit D**, i-wireless proposes to offer an additional Lifeline rate plan beginning December 2, 2016. This new rate plan will meet the mobile broadband minimum service standards for data usage and speed.<sup>2</sup> As depicted in revised **Exhibit D**, in Oregon this new plan will be combined with the additional 250 free voice minutes funded by the OTAP, resulting in 350 voice minutes, unlimited text messaging, and 500 megabytes of data each month – all at no charge to Oregon Lifeline customers. The devices provided to Oregon Lifeline customers by i-wireless will meet the minimum equipment requirements set forth in 47 C.F.R. §54.408(f).

In addition, i-wireless proposes changes to its top-up options for purchasing additional minutes which will enhance benefits to i-wireless customers through increased amounts of voice and/or data. The \$5 top-up will now provide 250 voice minutes and 250 megabytes of data, while the \$10 top-up will now provide 500 voice minutes and 500 megabytes of data. The \$25, \$35, and \$50 top-ups will now provide 1 gigabyte of data, 2.5 gigabytes of data, and 4 gigabytes of data, respectively, along with unlimited voice minutes. There are no current changes to the Company's Lifeline-discounted retail plans; however, i-wireless will be phasing out the retail plan offers as they are no longer competitive with the Access Wireless Lifeline plans with corresponding top-ups.

Please contact me if you have any questions regarding this filing.

Very truly yours,

Davis Wright Tremaine LLP



Alan J. Galloway

Alan J. Galloway

*Of Attorneys for i-wireless, LLC*

Encl: Exhibit D (i-wireless' improved Oregon Lifeline service offerings)

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<sup>2</sup> See *Third Report and Order*, ¶ 93. FCC rules regarding minimum service standards will become effective December 2, 2016, 60 days after announcement of approval from the Office of Management and Budget (OMB), subject to the Paperwork Reduction Act of 1995 (PRA).

Exhibit D - Rate Plans (Effective October 22, 2016)

	Access Wireless		i-wireless Retail Plans*		
	Oregon Lifeline & OTAP Plan	Oregon Broadband & OTAP Plan**	Unlimited Talk & Text	Unlimited Talk, Text, & 2GB Data	Unlimited Talk, Text, & 3GB Data
National Plan Voice Minutes (non-rollover)	500	100	Unlimited	Unlimited	Unlimited
OTAP Voice Minutes (non-rollover)	250	250			
Text	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data	50MB	500MB	500MB	2.0GB	3.0GB
Additional Airtime	Available with purchase of Top Up Card		n/a	n/a	n/a

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

Retail Price	n/a	n/a	\$ 35.00	\$ 50.00	\$ 75.00
Federal Subsidy	\$ 9.25	\$ 9.25	\$ 9.25	\$ 9.25	\$ 9.25
OTAP Subsidy	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50
Company Credit	\$ -	\$ -	\$ 2.25	\$ 2.25	\$ 2.25
Lifeline Consumer Price	\$0	\$0	\$ 20.00	\$ 35.00	\$ 60.00

\* The \$10/100 Min & \$25/250 Min Retail Plans are not approved for Lifeline/OTAP discounts in OR.

For currently available retail plans, see [www.krogeriwireless.com](http://www.krogeriwireless.com)

\*\* Effective 12/2/2016

ACCESS WIRELESS TOP UP OPTIONS\*\*\*

	\$5 PIN	\$10 Card	\$25 Card	\$35 Card	\$50 Card
Purchased Minutes	250	500	Unlimited	Unlimited	Unlimited
Text	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited
Data	250 MB	500 MB	1 GB	2.5 GB	4 GB
Picture Mail	Included	Included	Included	Included	Included

\*\*\* Top Ups are valid for 30 days from the date the airtime card is applied to account for all top-ups except the \$5 PIN, which is valid for 10 days from the date it is applied.