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March 25, 2016

VIA OVERNIGHT 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:

In accordance with Order No. 15-300 entered September 29, 2015 in Docket No. UM 1509 and the corresponding approved Stipulation, i-wireless, LLC d/b/a Access Wireless (“i-wireless” or the “Company”) hereby notifies the Commission that it proposes to change its Lifeline offering as described below. i-wireless does not propose any changes to Lifeline services provided at no charge to the customer.

i-wireless’ approved service offerings for Lifeline customers in Oregon, including “top up” card options for purchasing additional minutes, were described in Exhibit D of the Stipulation. i-wireless is in the process of making changes to the Company’s national rate card which will simplify the purchase of the discounted i-wireless retail plans using available top-up card denominations. The proposed changes are summarized in Exhibit A attached hereto; a redline version is included for convenience to indicate the changes as compared to Exhibit D of the Stipulation.

As reflected in attached Exhibit A, a Lifeline consumer who purchases the \$35 Unlimited Talk, Text and 1 GB of Data plan will receive the benefit of a \$2.25 rate reduction. Nationally, this is the most popular plan purchased by Lifeline customers (the most popular plan overall is the free plan offering). In order to align the other discounted retail plans with the goal of simplifying purchase using available top-up cards, a slight rate increase was necessary on the unlimited plans with 2GB and 3GB of data. However, these plans are seldom selected by consumers and have less than a 0.03% take rate nationally. The changes to discounted retail rates proposed herein are solely the result of a change in the amount of additional Company credit offered. i-wireless will pass through to its Oregon Lifeline customers all funds received from the federal USF and OTAP. Finally, i-wireless proposes changes to its top-up card options which will result in greater benefits to the consumer.

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i-wireless is in the process of demonstrating operational readiness in accordance with the Stipulation, paragraph 23(a), and therefore has not yet begun to offer Lifeline service in Oregon. Thus, no current customers are impacted by the changes proposed herein.

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

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,

A handwritten signature in cursive script that reads "Heather Kirby".

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

Enclosures

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EXHIBIT A

Proposed Changes to Lifeline Offering

(Redline and Clean versions)

Rate Plans - Proposed Changes (redline)

	Access Wireless	i-wireless Retail Plans*		
	Oregon Lifeline Plan	Unlimited Talk & Text	Unlimited Talk, Text, & 2GB Data	Unlimited Talk, Text, & 3GB Data
Plan Minutes	500 (non-rollover)	Unlimited	Unlimited	Unlimited
Text	Unlimited	Unlimited	Unlimited	Unlimited
Data	n/a	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
Local Calls	X	X	X	X
Nationwide Long Distance	X	X	X	X
Voicemail, Caller ID, Call Waiting	X	X	X	X
Free 911	X	X	X	X
Free 611	X	X	X	X
Balance Inquiries	X	X	X	X
Rollover Allowed	X	X	X	X
Text Included	X	X	X	X
Data Allowance		X	X	X
Participation in Kroger Free Minute Loyalty Program	X	X	X	X
Retail Price	n/a	\$ 35.00	\$ 50.00	\$ 75.00
Federal Subsidy	\$ 9.25	\$ 9.25	\$ 9.25	\$ 9.25
OTAP Subsidy	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50
Company Credit	\$ -	0 2.25	5.75- 2.25	5.75- 2.25
Lifeline Consumer Price	\$0	\$ 22.25 - 20.00	\$ 31.50 - 35.00	\$ 56.50 - 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

ACCESS WIRELESS TOP UP CARDS**

	\$5 Card	\$10 Card	\$25 Card	\$35 Card	\$50 Card
Purchased Minutes	100	150-250	300 500	Unlimited	Unlimited
Text	n/a	n/a	n/a		
Data	0	100 250 MB	500 750 MB	500 MB-1 GB	2 GB
Picture Mail	0- Included	25 Included	50-100- Included		

**Top Up Card is valid for 30 days from the date the airtime card is applied to account for all cards with the exception of \$5 card, which is valid for 10 days from date applied.

Rate Plans - Proposed Changes

	Access Wireless	i-wireless Retail Plans*		
	Oregon Lifeline Plan	Unlimited Talk & Text	Unlimited Talk, Text, & 2GB Data	Unlimited Talk, Text, & 3GB Data
Plan Minutes	500 (non-rollover)	Unlimited	Unlimited	Unlimited
Text	Unlimited	Unlimited	Unlimited	Unlimited
Data	n/a	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
Local Calls	X	X	X	X
Nationwide Long Distance	X	X	X	X
Voicemail, Caller ID, Call Waiting	X	X	X	X
Free 911	X	X	X	X
Free 611	X	X	X	X
Balance Inquiries	X	X	X	X
Rollover Allowed	X	X	X	X
Text Included	X	X	X	X
Data Allowance		X	X	X
Participation in Kroger Free Minute Loyalty Program	X	X	X	X

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

ACCESS WIRELESS TOP UP CARDS**

	\$5 Card	\$10 Card	\$25 Card	\$35 Card	\$50 Card
Purchased Minutes	100	250	500	Unlimited	Unlimited
Text	n/a	n/a	n/a		
Data	0	250 MB	750 MB	1 GB	2 GB
Picture Mail	Included	Included	Included		

**Top Up Card is valid for 30 days from the date the airtime card is applied to account for all cards with the exception of \$5 card, which is valid for 10 days from date applied.