

Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005

Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

November 19, 2010

VIA OVERNIGHT DELIVERY

Public Utility Commission of Oregon
550 Capitol Street, NE
Salem, Oregon 97310-1380
Attn: Ms. Lois Meerdink

Re: i-wireless, LLC

Dear Lois:

Enclosed please find an original and one (1) copy of the Application for Designation as an Eligible Telecommunications Provider in the State of Oregon for i-wireless, LLC along with an original signed signature page. **This filing has been electronically submitted.**

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 or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ Lance J.M. Steinhart

Lance J.M. Steinhart
Attorney for i-wireless, LLC

Enclosures

cc: Patrick McDonough

Oregon Telephone Assistance Program (OTAP) Application
for Eligible Telecommunications Provider (ETP) to provide OTAP Services

i-wireless, LLC

Part I. Application Information and Service Plan

1. Contact information pertaining to your designated staff who would be handling OTAP communications:

Name: Patrick McDonough, Vice President

Address: 1 Levee Way, Suite 3104

City: Newport State: Kentucky Zip: 41071

Phone number: (513) 378-1731 Fax: (859) 261-6639

E-Mail: pat.mcdonough@iwirelesshome.com

2. The number of residential, business and tribal basic service customers served by the applicant as of December 31, of the most recent calendar year.

As of December 31, 2009, i-wireless had [CONFIDENTIAL] residential customers in Oregon.

Part II. Conditions to Provide OTAP Services to Qualifying Oregonians

These conditions apply in addition to the general conditions of certification. Violating these conditions, or misrepresenting information provided to PUC in the course of administering the OTAP programs may result in cancellation of your authority to provide OTAP Services and/or an order requiring you to refund with interest and penalties of any OTAP support distributed under false information.

1. The applicant agrees to offer reduced residential rates with all service offerings that include basic telephone or cellular service to eligible low-income customers pursuant to the Oregon Telephone Assistance program (OTAP).
2. The applicant understands that only PUC may approve OTAP benefits for the consumer and provide benefits to OTAP consumers after PUC has notified the applicant of their eligibility. A telecommunication provider who grants OTAP benefits to ineligible customers will have the total amount of the OTAP benefits that were given to those customers deducted from the monthly or quarterly OTAP reimbursement invoices that the telecommunications provider submits to the Commission (OAR 860-033-0045 (1) (d)).

3. The applicant agrees that they will ensure the consumer will see their OTAP credit within 30 days from the date that the applicant has been notified of the consumer's eligibility status, and to remove consumers within 30 days after they no longer qualify for OTAP benefits.
4. The applicant agrees that they will submit reports for reimbursement quarterly (if they have less than 1,000 OTAP consumers) or monthly (if they have more than 1,000 OTAP consumers). Reports are expected to be submitted even if there are zero consumers (OAR 860-033-0045 (1)).
5. An OTAP recipient is required to be the named subscriber to the local telecommunication service in order for that household to qualify for OTAP benefits. PUC may waive this requirement if it determines that good cause exists. Applicant agrees to comply with reimbursing OTAP consumers who are not named subscribers at the Commission's request.
6. The applicant agrees to apply Commission assigned OTAP identification numbers to its OTAP customers' accounts.
7. Based upon accounting procedures approved by the Commission, the applicant agrees to maintain accounting records so that costs associated with OTAP can be separately identified. Records must be provided to the Commission upon request.
 - a. **Active OTAP Customer Report:** The applicant agrees to submit an Active OTAP Customer Report listing the names of all customers with the Commission assigned identification number receiving the OTAP benefits. Applicants with 1,000 or more OTAP customers must submit the report monthly to the Commission Applicants with fewer than 1,000 OTAP customers must submit the report quarterly to the Commission.
 - b. **Order Activity Report:** The applicant agrees to submit an Order Activity Report listing the names of all OTAP customers with the Commission assigned identification number whose service was disconnected. The applicant is aware that the Commission may require additional information such as a listing of all OTAP customers whose telephone numbers or addresses have changed.
 - c. **No Match Report:** The applicant agrees to notify the Commission of any discrepancy that prevents a customer from receiving the OTAP benefit after the Commission has notified the applicant of customers who meet eligibility criteria on a weekly basis.
8. The applicant agrees to ensure that confidential information (including phone number, addresses, contact information, etc.) of OTAP recipients is protected (OAR 360-033-0030 (5)). The applicant agrees to maintain a written policy to

ensure that the applicant's staff does not breach the confidentiality of OTAP consumers, and to do background checks on employees who have access to customer records.

9. The applicant agrees to have in place database encryption and firewall technologies to protect customer service information stored electronically.

s/PM

APPLICANT UNDERSTANDS ALL OF THE ABOVE CONDITIONS AND AGREES TO ABIDE BY ALL APPLICABLE COMMISSION RULES, STATE LAW AND THE CONDITIONS OF CERTIFICATION. PLEASE INITIAL BOX AT LEFT.

/s/ Patrick McDonough
Signature of person authorized to represent applicant

Vice President
Title

Patrick McDonough
Printed Name

November 4, 2010
Date

The Oregon Administrative Rules (OAR) 860-033-0005(3)(c) require an ETP applicant to demonstrate that it will comply with OAR 860-033-0005 through 860-33-0100. i-wireless will comply with said OAR regulations to the extent that they are applicable to a prepaid wireless reseller. i-wireless hereby petitions the Commission for waiver of the following rules that are not applicable to i-wireless:

860-033-0030(6) - This rule requires the name of the applicant or recipient to appear on the billing statement for the telecommunications service in order to qualify for OTAP benefits. The Commission may waive this requirement if good cause exists. i-wireless, as a provider of prepaid services, does not issue billing statements, and thus requests a waiver of the requirement.

860-033-0035(1)(A-B) - i-wireless will comply with sub-sections (1)(A) and (1)(B), which relate to the OTAP benefit on tribal lands, to the extent that i-wireless is eligible to receive Tier IV support. If i-wireless is not eligible to receive Tier IV support, then i-wireless will offer the same Lifeline benefit to residents of tribal lands as it does to residents of non-tribal lands in Oregon.

860-033-0050 - This rule relates to Link-Up America eligibility. i-wireless is not seeking designation as an ETP to provide Link-Up service. Therefore, this rule does not apply to i-wireless and i-wireless petitions the Commission for waiver of this rule.

860-033-0055 - This rule relates to Link-Up America benefits. i-wireless is not seeking designation as an ETP to provide Link-Up service and is not permitted to do so by the conditions of its FCC Forbearance Order. Therefore, this rule is not applicable to i-wireless and i-wireless petitions the Commission for waiver of this rule.

860-033-0100 - This rule relates to toll-limitation service. There is no need for i-wireless to offer a toll limitation feature to qualifying low-income customers. Since i-wireless' service is a prepaid service, no customers will be disconnected for failure to pay toll charges or, for that matter, any other charges. i-wireless treats long distance minutes of use as any other usage and the customers are not charged separately for toll services. Inasmuch as all i-wireless services are prepaid, there is no danger that low income customers will incur large charges for heavy toll (or other) calling and no risk that they will be disconnected for nonpayment. Therefore, it is unnecessary for i-wireless to offer toll limitation service and i-wireless petitions the Commission for waiver of this rule.