



March 15, 2021

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission (PUC) of Idaho
11331 W. Chinden Blvd. Building 8, Suite 201-A
Boise, ID 83714

RE: Torch Wireless Application for Designation as an Eligible Telecommunications Carrier

Ms. Noriyuki:

Enclosed please find the application of Torch Wireless for Designation as an Eligible Telecommunications Carrier in the State of Idaho.

If there are any questions on the documents, please feel free to contact me. Thank you.
Respectfully submitted,



Jorge E. Perea
Chief Executive Officer, Torch Wireless
jperea@torchwireless.com
904.720.4505

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

)

In the matter of the application of Torch Wireless for
Designation as an Eligible Telecommunications Carrier.)

)

**APPLICATION OF TORCH WIRELESS
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

Torch Wireless (“Torch” or the “Company”), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹, Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”)², and the rules and regulations of the Idaho Public Utilities Commission (“Commission”)³ hereby submits this application for designation as an Eligible Telecommunications Carrier (“ETC”) in the entire State of Idaho (including Tribal Lands) for local exchange services in the designated service area, for the purpose of receiving federal universal service supported. The Company is seeking only low-income support to provide Lifeline services to qualifying consumers in the state of Idaho. The Company is not seeking nor requesting high-cost support.⁴ Torch requests that its designation as an ETC include the authority to participate and receive reimbursement from the Idaho Telephone Service Assistance Program (ITSAP). As demonstrated herein, and as certified in this Application, Torch satisfies all the statutory and regulatory requirements for designation as an ETC in the Designated Service Area, including the requirements outlined in the FCC’s *Lifeline*

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ See In the Matter of the Application of Sage Telecom Communications, LLC dba TruConnect Seeking Designation as an Eligible Telecommunications Carrier that may receive Federal Universal Service Support, Commission Order No. 34266 (March, 7, 2019).

⁴ Given that Torch only seeks 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.

*and Link Up Reform Order*⁵ and *Lifeline Modernization Order*.⁶ Furthermore, designation of the Company in the Designated Service Area will serve the public interest as it would enable the Company to commence Lifeline service to low-income Idaho residents. Accordingly, Torch respectfully requests that the Commission grant this application.

All correspondence, including but not limited to, notices and decisions related to this Application, as well as communications for the Company, should be addressed to:

Torch Wireless
Regulatory Department
4320 Deerwood Lake Parkway, Suite 101-158
Jacksonville, FL 32216
Office: 904-574-4130
Fax: 904-584-9026
regulatory@torchwireless.com

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) (hereafter “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) (hereafter “Lifeline Modernization Order”).

I. INTRODUCTION

Torch Wireless is incorporated in the state of Wyoming and is authorized to conduct business as a foreign corporation in the state of Idaho. A copy of the authorization to do business is attached as Exhibit A, "Certificate of Registration". Its corporate address is 4320 Deerwood Lake Parkway, Suite 101-158, Jacksonville, Florida, 32216. Torch is a facilities-based Competitive Local Exchange Carrier (CLEC), Inter-Exchange Carrier (IXC), Commercial Radio Mobile Services (CMRS) provider, and an Eligible Telecommunications Company (ETC) in the state of Wisconsin. The Company was granted a Facilities Based Alternative Telecommunication Utility via Wisconsin docket 18015-NC-100 dated August 9, 2017, attached as Exhibit B, "Alternative Local Exchange Carrier Other Certification". The Company will provide services in the designated service area using their own facilities or a combination of their own facilities and the resale of another carrier's services.

Torch currently provides prepaid and Lifeline wireless telecommunications services and its network is integrated with Sprint Spectrum, L.P. ("Sprint"), Verizon Wireless ("Verizon"), and T-Mobile US, Inc. ("T-Mobile"), in order to provide network and transport services. This includes, but is not limited to, a series of local loops that interconnect to the Torch Wireless network and switching facilities. Torch Wireless may also obtain additional commercial agreements for end-to-end switching and delivery of calls purchased from other ILECs servicing Idaho, if needed.

A. Torch's Lifeline Offering

Lifeline is a component of one of the four separate federal universal service fund mechanisms known as the "low-income support mechanism" and is defined in 47 C.F.R § 54.401 as "a retail local service offering" available only to qualified low-income consumers for which qualifying low-income consumers pay reduced charges as a result of application of the Lifeline support amount that includes the services or functionalities enumerated in 54.401(a)(1) through (a)(9), which the Company will use to "make Lifeline services available to qualifying low-income consumers." In its Lifeline Modernization Order, the FCC created minimum service standards for wireless ETC carriers with requirements as of December 1, 2020 set at 1000 minutes per month. Further, the Lifeline Modernization Order requires that Lifeline-supported broadband plans provide at least 4.5 GB monthly as of December 1, 2020. Torch will comply with the current and future minimum

service requirements set out in the Lifeline Modernization Order, with several plans already in compliance. The Company's Rate Plans are attached as Exhibit C, "Torch Wireless Rate Plans".

B. Plan Enrollment

Consumers interested in obtaining information on the Lifeline program will be able to contact Torch via a toll-free number or the Company's website, where information regarding the Company's Lifeline service plans will be provided, along with a description of the Lifeline program and eligibility criteria. To obtain service, consumers will apply in-person for Lifeline through the National Verifier service provider portal, or on their own through the National Verifier consumer portal. They may also submit a paper application utilizing the standardized Lifeline Program Application Form, attached as Exhibit D, "USAC Lifeline Consumer Forms", as required by FCC rules, complying with the disclosure and information collection requirements in 47 C.F.R. § 54.410(d).⁷ Upon approval, Torch will assist consumers in completing their enrollment in their Lifeline qualified plan of choice and ensure Consumers understand continuing eligibility requirements to maintain service.

C. Prevention of Waste, Fraud, and Abuse

Torch recognizes the importance of safeguarding the Universal Service Fund from potential waste, fraud, and abuse. Torch relies on the National Verifier⁸ for the initial and ongoing determination of a subscriber's eligibility to qualify for Lifeline through the income-based eligibility criteria or program-based criteria set forth in C.F.R § 54.410. Further, Torch complies with the requirements of the National Lifeline Accountability Database ("NLAD") and section 54.404 of the FCC rules.

Through these processes, Torch can ensure applicants adhere to the "One Lifeline Benefit per Household" requirement.

⁷ *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). The standard application/certification forms are available on USAC's website (See USAC, Forms, Lifeline Application <https://www.usac.org/lifeline/additional-requirements/forms/>).

⁸ *See 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) (hereafter "Lifeline Modernization Order"), section III.C.

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 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 ("cure 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(c)(3), Torch 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. Consumers 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, Torch contracts with a third-party Lifeline service firm to verify and audit all subsidy request data, prior to request for support funds.

II. TORCH MEETS THE STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION

Torch Satisfies the Requirements for Designation as an ETC. 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.⁹ 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 will 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. Applicants also must

⁹ See Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd. 8776, 8858-59, ¶ 145 (1997) ("USF Order").

commit to advertise the availability and rates of such services.¹⁰ As detailed below, Torch Wireless satisfies each of the above-listed requirements.

- A. **Torch Is a Common Carrier as defined in the Act.** The Company will provide supported services in the state of Idaho, pursuant to Section 214(e)(1).
- B. **Torch will provide Universal Services** using a combination of its own facilities and resale. Section 214(e)(1)(A) requires that a carrier must use its own facilities or a combination of its own facilities and resale of another carrier's facilities in order to provide universal service supported services. Torch's network supports the provision of wireless voice telephony, utilizing a combination of elements provided by a national wireless carrier and Torch's own facilities. The network details are confidential and proprietary and included in Confidential Exhibit H, "Torch Wireless Network Description."
- C. The services that are supported by the Federal Universal support mechanisms under section 254(c) are:
 - a. Voice Telephony Service
 - i. Voice Grade Access to the Public Switched Telephone Network – The ability to transmit and receive communications with a minimum bandwidth of 300 to 3,500 Hertz (47 C.F.R § 54.101(a)(1)). Torch meets this requirement through its provision of voice communications service and interconnection to the public switched telephone network.
 - ii. Local Usage – An amount of minutes of use provided free of charge to end users (47 C.F.R. § 54.101(a)(2)).
 - iii. Access to Emergency Services – Access to emergency services includes both access to 911 and E911 services to the extent the local government has implemented such services (47 C.F.R. § 54.101(a)(5)). Torch meets this requirement by providing access to 911 services and meeting all requests for access to E911 services through local public service answering points ("PSAPs").
 - b. Broadband Internet Access Services

¹⁰ See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(2).

Broadband Internet access service ("BIAS") is a supported service as of December 2, 2016. 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."¹¹ Torch provides BIAS to low-income consumers combination of their own facilities and the resale of another carrier's services.

D. Torch Will Advertise the Availability and Rates for Its Services. Upon certification as an ETC, Torch will participate in, and offer Lifeline services to qualifying low-income consumers and publicize the availability of the lifeline services in a manner reasonably designed to reach those likely to qualify for those services, as required by FCC Rules. A sample advertisement of state-specific advertisement is attached as Exhibit E.

Torch will advertise the availability of the above-referenced services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules. The current zip code coverage footprint is attached as Exhibit F.

E. Commitment to Consumer Protection and Service Quality Standards. Under FCC guidelines, 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.¹² Torch hereby commits to comply with the CTIA Consumer Code for Wireless Service.

F. Inapplicability of Five-Year Network Improvement Plan

As set forth in 47 C.F.R. § 54.202(a)(1)(i), 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.

¹¹ See 47 C.F.R. § 8.2(a).

¹² See 47 C.F.R. § 54.202(a)(3).

G. Ability to Remain Functional in Emergency Situations

In accordance with 47 C.F.R. § 54.202(a)(2), through its underlying carrier agreements, Torch has the ability to remain functional in emergency situations. The Company and its underlying carriers' networks have access to a reasonable amount of back-up power to ensure functionality without an external power source, are able to reroute traffic around damaged facilities, and are capable of managing traffic spikes resulting from emergency situations. These underlying carriers have repeatedly certified to the FCC that their networks function in emergency situations.¹³ The underlying carriers provide the same functionality to Torch and its Consumers as these carriers provide to themselves and their own Consumers.

H. Financially and Technically Capable

In accordance with 47 C.F.R. § 54.202(a)(4), Torch is financially and technically capable of providing Lifeline-supported services. The Company has been offering telecommunications services since 2016, including the provision of wire-line transport services to telecommunications carriers, strategic partners, and vendors. In January 2018, Torch began providing Lifeline and non-Lifeline wireless services. As such, Torch does not offer exclusively Lifeline supported service only, and therefore is not exclusively dependent on a regulatory governing body for its revenue. Torch has not been subject to enforcement actions or license revocation proceedings in any state. The Company is financially sound and assuredly capable of honoring its service obligations to Consumers and also its regulatory obligations to the FCC and State of Idaho regulators.

Furthermore, the senior management of Torch has extensive business and managerial expertise, with an established record in the operations, marketing, and delivery of telecommunications services, including wireless.

¹³ See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

I. Compliance with All Regulations Imposed by The Commission

By this Application, Torch hereby makes known its ability and also its willingness to fully comply with all the rules and regulations that the Commission lawfully imposes upon the provision of service as stated and detailed within this Application. Torch commits to comply with applicable ITSAP regulations, including but not limited to required monthly reporting, as well as execution of a Memorandum of Understanding with the Department of Health and Welfare. Torch further commits to remit required ITSAP funds to the ITSAP Administrator.

As the Company is not seeking high-cost support for its wireless service, it hereby requests a waiver of the non-applicable Commission Rules, *Commission Order No. 29841* Section B.1 (two-year network improvement and maintenance plan based on high-cost support).

III. DESIGNATION OF TORCH AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

One of the primary objectives dictated by the Telecommunications Act of 1996, as amended; 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.¹⁴

Designation of Torch as an ETC in Idaho will further the public interest by providing Idaho consumers, especially low-income consumers, with low prices and high-quality services. Many low-income Consumers have yet to reap the full benefits of the intensely competitive wireless market, whether because of economic or financial constraints, employment impacts, or poor credit history.

The benefit given to a consumer having the ability to make a conscious choice and to choose from multiple providers has been recognized by the FCC for decades.¹⁵ Designation of Torch as an Eligible Telecommunications Carrier will promote competition and encourage other carriers to seek to engage low-income consumers. The presence of additional providers results in diversity of options, greater innovation for consumers, competitive pricing, and enhanced service experiences. Both the new entrant and existing providers in a communications market are incented to offer consumers more

¹⁴ *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

¹⁵ *See Virgin Mobile Order*, 24 FCC Red at 3395 38.

attractive service and more favorable terms. Introducing Torch into the market as a wireless ETC provider will afford low-income residents a wider and more broad choice of providers and available services thus creating a more competitive marketplace as ETC's compete for a specific number of Lifeline-eligible Consumers. By overall increasing the competitive marketplace and number of providers within the market, the Commission has the ability to significantly increase the number of consumers consumption of wireless service and decrease the overall number of peoples who have no connection to the Public Switched Telephone Network

A. Impact on the Universal Service Fund

Torch's request for designation as an ETC solely for the purposes of participating in the Lifeline program would not unduly burden the USF or otherwise reduce the amount of funding available to other ETCs, as with Lifeline, they only receive support for Consumers they obtain with Lifeline. The amount of support available to any potential consumer is the same whether the Lifeline support is given through Torch, any other ETC, and/or an ILEC operating in the same service area(s).

Torch will therefore only increase the amount of USF Lifeline funding in situations where it obtains Lifeline Consumers that are not presently enrolled in another ETC's Lifeline program. By implementing all the mandates, requirements, and parameters as set forth in the *Lifeline and Link-Up Reform Order*, and utilizing National Verifier and NLAD, Torch will decrease the possibility that its consumers are not eligible or are presently receiving support either individually or within their household. In accordance, Torch'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. Any incremental increases in Lifeline expenditures far outweigh the significant public interest benefits of expanding the availability of affordable wireless services to low-income consumers.

IV. CONCLUSION

Torch respectfully requests designation as an ETC for the Designated Service Area for the purpose of receiving federal low-income universal service support.

Respectfully submitted,


Torch Wireless
Jorge E. Perea, Chief Executive Officer

Dated March 15, 2021

TORCH WIRELESS AFFIDAVIT

I, Jorge E. Perea, being first duly sworn upon oath, depose and say that I am an Officer of Torch Wireless, and as such, I am authorized to make this verification on its behalf; that I have read the foregoing information; that I know the contents thereof; and that the matters stated in the foregoing Advice Letter are true and correct to the best of my knowledge.

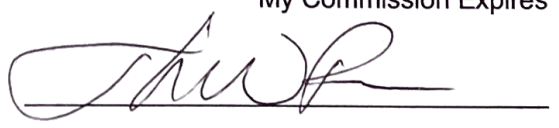
I declare under penalty of perjury that the foregoing is true and correct.



Jorge E. Perea
Torch Wireless, Chief Executive Officer

SWORN TO AND SUBSCRIBED before me, the undersigned Notary Public,
the 12TH day of MARCH 2021.

02-04-2022

My Commission Expires


Notary Public



THOMAS W PEARCE
Commission # GG 182469
Expires February 4, 2022
Bonded Thru Budget Notary Services

EXHIBIT A

CERTIFICATE OF REGISTRATION

State of Idaho

Office of the Secretary of State

**CERTIFICATE OF REGISTRATION
OF
Torch Wireless
dba TORCH WIRELESS CORP.**

Filing Number: 4049972

I, LAWRENCE DENNEY, Secretary of State of the State of Idaho, hereby certify that an application for Foreign Registration Statement, duly executed pursuant to the provisions of the Idaho Uniform Business Organization Code, has been received in this office and is found to conform to law.

ACCORDINGLY, by virtue of the authority vested in me by law, I issue this Certificate of Registration to transact business in this State and attach hereto a duplicate of the application for such certificate.

Dated: 3 November 2020




Lawrence Denney
Secretary of State

Processed by: Business Division

EXHIBIT B

ALTERNATIVE LOCAL EXCHANGE CARRIER OTHER CERTIFICATION

SERVICE DATE
Aug 09, 2017

PSC REF#: 329480

Public Service Commission of Wisconsin
RECEIVED: 08/09/2017 8:35:02 AM

PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of Torch Wireless for Certification as a Competitive Local
Exchange Carrier and Alternative Telecommunications Utility

18015-NC-100

**FINAL DECISION GRANTING CERTIFICATION
AS A COMPETITIVE LOCAL EXCHANGE CARRIER**

Introduction

On July 19, 2017, Torch Wireless (Torch) filed an application to be certified as a competitive local exchange carrier (CLEC). ([PSC REF#: 328370](#).) Torch, pursuant to Wis. Stat. § 196.203, seeks certification as an alternative telecommunications utility under the “other” category (ATU-other), defined in Wis. Stat. § 196.01(1d)(f), to provide intrastate intraLATA and interLATA toll and local exchange services. A list of persons interested in this proceeding may be found in Appendix A.

Background

On September 21, 2016, Torch Wireless registered with the Public Service Commission of Wisconsin (Commission) as a Voice over Internet Protocol (VoIP) provider. Torch is now seeking certification as a CLEC.

2011 Wisconsin Act 22 (Act 22), also known as the Telecommunications Modernization Act, became effective on June 9, 2011. Act 22 significantly modified Wis. Stat. ch. 196 relating to the regulation of telecommunications utilities and telecommunications services in Wisconsin. Act 22 implements a clear intention to level the regulatory playing field among competitors by imposing similar regulations on competing entities.

Docket 18015-NC-100

In a Final Decision¹ issued July 12, 2011, the Commission granted a recertification to Wisconsin Bell, Inc., d/b/a AT&T Wisconsin that addressed many issues related to the new recertification process arising from Act 22. Since the AT&T Wisconsin recertification in docket 6720-NC-100 was also as an ATU, the Final Decision in that case addressed the application of the “parity provision” in Wis. Stat. § 196.203(3) (“If the commission imposes a provision of this chapter specified in sub. (4m)(a) on an [ATU] under this subsection, the commission shall impose the same provision at the same level of regulation on all other alternative telecommunications utilities.”). Following on its determinations in docket 6720-NC-100, the Commission also recertified numerous entities, specifically affiliates of CenturyTel, Frontier, and TDS Telecom.² Due to the enactment of Act 22 and the above-cited decisions, the Commission will grant this application with a reduced level of regulation subject to the parity provision.

The Commission delegated the issuance of this type of Final Decision to the Division Administrator of the Division of Water, Telecommunications and Consumer Affairs based on the guidance provided in previous dockets involving recertification pursuant to the provisions of Act 22.

Findings of Fact

1. Torch is qualified by the Wisconsin Department of Financial Institutions to do business in Wisconsin.

¹ See “Final Decision Granting Recertification as an Alternative Telecommunications Utility, *Notice of Wisconsin Bell, Inc., d/b/a AT&T Wisconsin to Terminate Certificate Under Wis. Stat. § 196.50 and Become Certified as an Alternative Telecommunications Utility Under Wis. Stat. § 196.203*, Docket No. 6720-NC-100 (July 12, 2011).

² CenturyTel affiliates were recertified ATUs under Wis. Stat. § 196.50(2)(j)1.a., similar to AT&T Wisconsin. Frontier and TDS Telecom affiliates were granted recertification as “telecommunications utilities” pursuant to Wis. Stat. § 196.50(2)(j)1.b.

2. Torch represents that it has the financial resources, managerial ability, and technical expertise to adequately provide its proposed telecommunications services.

No information to the contrary has come to the Commission's attention.

3. It is consistent with Wis. Stat. § 196.203(2)(b) to reflect Torch's certification as statewide in geographical scope.

4. The following statutes must be applied to Torch: Wis. Stat. §§ 196.01, 196.016, 196.025(6), 196.191, 196.206, and 196.212.

5. The Commission may apply to Torch's certification a number of statutes: Wis. Stat. §§ 196.02(1), (4), and (5); 196.04; 196.135; 196.14; 196.197(1), (2), and (4); 196.199; 196.207; 196.208; 196.209; 196.218; 196.219(1), (2)(b), (c), and (d); (2r); (3)(a), (d), (j), (m), (n) and (o); 196.25; 196.26; 196.39; 196.395; 196.40; 196.41; 196.43; 196.44; 196.65; 196.66; 196.81; 196.85; 196.858 and 196.859.

6. The Commission finds it in the public interest to impose certain statutes with respect to Torch's intrastate switched access services, specifically Wis. Stat. §§ 196.03(1) and (6), 196.37 and 196.212; and, with respect to Torch's wholesale telecommunications services only, Wis. Stat. §§ 196.03(1) and (6), 196.219(4), 196.28, and 196.37.

7. It is not necessary in this Final Decision to determine the application of the parity provisions of Wis. Stat. § 196.203(3) to different types of ATUs.

8. It is not necessary in this Final Decision to interpret the meaning of "switched access service" in Wis. Stat. § 196.01(8e) as that definition relates to Extended Area Service (EAS) and Extended Community Calling (ECC).

9. It is not necessary to address in this Final Decision the potential that historical, informal arrangements with other providers may be changed in light of Act 22.

10. It is reasonable to continue to apply any previous orders, rules, or Commission determinations that are not inconsistent with Act 22.

Conclusions of Law

1. The Commission concludes it has jurisdiction pursuant to Wis. Stat. §§ 196.02(1), 196.395, and 196.203 to certify Torch as a competitive local exchange carrier in the ATU-other category. This certification under Wis. Stat. § 196.203(3) and (4m), with the imposition of statutes described above in Findings of Fact Nos. 4, 5, and 6, is in the public interest and complies with applicable law.

2. The Commission has authority under Wis. Stat. § 15.02(4) to delegate to the Administrator of the Division of Water, Telecommunications and Consumer Affairs those functions vested by law as enumerated above.

3. It is consistent with Wis. Stat. § 196.203(2)(b) in this certification to reflect Torch's certification as statewide in geographical scope.

4. It is reasonable, in the public interest, and consistent with the Commission's prior decision in docket 6720-NC-100 as applicable here, to act, or refrain from acting, as set forth herein in certifying Torch under Wis. Stat. § 196.203(2)(a).

Opinion

The Commission concludes that the public interest is best served by imposing on Torch the same statutes imposed on AT&T Wisconsin in docket 6720-NC-100.

The public interest supports the imposition of the statutes listed in Findings of Fact Nos. 4, 5 and 6. Those statutes contribute to leveling regulation among competitors in the telecommunications service market in this state, thereby removing potentially distorting effects of differential regulation and maximizing competition consistent with Wis. Stat. §§ 133.01 and 196.03(6)(a). This reduced, “levelized” regulation, when combined with the statewide certification for ATUs effected by Wis. Stat. § 196.203(2)(b), also contributes to the public interest by promoting consumer choice, deployment of telecommunications infrastructure, and efficiency and productivity. *See* Wis. Stat. § 196.03(1) and (6)(b), (e), and (f). Other public interest factors listed in Wis. Stat. § 196.03(6) are either not relevant or outweighed by the foregoing cited factors.

Torch’s request for certification does not alter some issues identified in docket 6720-NC-100. Specifically, this decision does not resolve the “carry over” issues, or allow for differing treatments, as to the following: (1) the meaning of “switched access service” in Wis. Stat. § 196.01(8e); (2) any changes in treatment or status of historical, informal arrangements between providers in light of Act 22; (3) any application to, or effect on, rights, duties or privileges that Torch may have under federal law; (4) reservation of a right to seek certificate modifications to continue parity of regulatory treatment; and (5) intended continued application of previous orders, rules or Commission determinations that are not inconsistent with Act 22. *See* Final Decision, docket 6720-NC-100, at 4-5, and 10-11.

The Commission’s issuance of this certification for Torch is consistent with Wis. Stat. § 196.203, the precedential guidance of the Final Decision in docket 6720-NC-100, and the public interest as framed by Wis. Stat. § 196.03(1) and (6).

Order

1. This Final Decision shall be effective one day after the date of service.
2. Torch is granted certification as an alternative telecommunications utility as set forth in the certificate below.
3. In the event that future Commission action implicates the parity provisions of Wis. Stat. § 196.203(3) and impacts Torch's certificate, Torch shall provide notice to the Commission that it desires to be issued a new certificate reflecting the change in regulation.
4. The Commission retains jurisdiction.

Certificate

Torch Wireless, as of the effective date of this Final Decision, is a telecommunications utility per Wis. Stat. § 196.01(10), an ATU per Wis. Stat. § 196.01(1d)(f), certified per Wis. Stat. §§ 196.203(2)(a), and authorized throughout Wisconsin to offer facilities-based and resold intrastate telecommunications services, access services, and all other telecommunications services available for certification.

Torch Wireless, shall be subject to the following statutory provisions: Wis. Stat. §§ 196.01; 196.02 (1), (4), and (5); 196.04; 196.016; 196.025(6); 196.135; 196.14; 196.191; 196.197(1), (2) and (4); 196.199; 196.206; 196.207; 196.208; 196.209; 196.212; 196.218; 196.219(1), (2)(b), (c), and (d), (2r), and (3)(a), (d), (j), (m), (n), and (o); 196.25; 196.26; 196.39; 196.395; 196.40; 196.41; 196.43; 196.44; 196.65; 196.66; 196.81; 196.85; 196.858; and 196.859.

With respect to wholesale telecommunications services only, Torch Wireless shall be subject to the following additional provisions of Wis. Stat. ch. 196: Wis. Stat. §§ 196.03(1) and (6), 196.219(4), 196.28, and 196.37.

Docket 18015-NC-100

With respect to its intrastate switched access services only, Torch Wireless shall be subject to the following additional provisions of Wis. Stat. ch. 196: Wis. Stat. §§ 196.03(1) and (6), and 196.37.

To the extent the Commission later chooses not to impose a provision listed in section Wis. Stat. § 196.203(4m)(a) on any ATU, pursuant to Wis. Stat. § 196.203(3), Torch Wireless shall be provided the same regulatory relief and shall provide notice to the Commission that it desires to be issued a new certificate reflecting that change in regulation.

All regulatory requirements related to Torch Wireless' certification that are not inconsistent with 2011 Wisconsin Act 22 or this certificate, apply to Torch Wireless.

Dated at Madison, Wisconsin, August 8, 2017.

For the Commission:

A handwritten signature in black ink, appearing to read "Steven A. Knudson". The signature is written in a cursive, flowing style.

Steven A. Knudson
Administrator
Division of Water, Telecommunications, and Consumer Affairs

SAK:KN:PRJ: DL:01557300

See attached Notice of Rights

PUBLIC SERVICE COMMISSION OF WISCONSIN
610 North Whitney Way
P.O. Box 7854
Madison, Wisconsin 53707-7854

**NOTICE OF RIGHTS FOR REHEARING OR JUDICIAL REVIEW, THE
TIMES ALLOWED FOR EACH, AND THE IDENTIFICATION OF THE
PARTY TO BE NAMED AS RESPONDENT**

The following notice is served on you as part of the Commission's written decision. This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

PETITION FOR REHEARING

If this decision is an order following a contested case proceeding as defined in Wis. Stat. § 227.01(3), a person aggrieved by the decision has a right to petition the Commission for rehearing within 20 days of the date of service of this decision, as provided in Wis. Stat. § 227.49. The date of service is shown on the first page. If there is no date on the first page, the date of service is shown immediately above the signature line. The petition for rehearing must be filed with the Public Service Commission of Wisconsin and served on the parties. An appeal of this decision may also be taken directly to circuit court through the filing of a petition for judicial review. It is not necessary to first petition for rehearing.

PETITION FOR JUDICIAL REVIEW

A person aggrieved by this decision has a right to petition for judicial review as provided in Wis. Stat. § 227.53. In a contested case, the petition must be filed in circuit court and served upon the Public Service Commission of Wisconsin within 30 days of the date of service of this decision if there has been no petition for rehearing. If a timely petition for rehearing has been filed, the petition for judicial review must be filed within 30 days of the date of service of the order finally disposing of the petition for rehearing, or within 30 days after the final disposition of the petition for rehearing by operation of law pursuant to Wis. Stat. § 227.49(5), whichever is sooner. If an *untimely* petition for rehearing is filed, the 30-day period to petition for judicial review commences the date the Commission serves its original decision.³ The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

If this decision is an order denying rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not permitted.

Revised: March 27, 2013

³ See *Currier v. Wisconsin Dep't of Revenue*, 2006 WI App 12, 288 Wis. 2d 693, 709 N.W.2d 520.

APPENDIX A

This docket proceeding is not a contested case under Wis. Stat. ch. 227, therefore there are no parties as defined in Wis. Stat. § 227.01(8), to be listed or certified under Wis. Stat. § 227.47. However, the persons listed below are defined by Wis. Admin. Code § PSC 2.02(7), (10), and (12) as parties in the docket and participated therein.

Public Service Commission of Wisconsin
(Not a party but must be served)
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

Torch Wireless
Jorge E. Perea, Managing Partner
4320 Deerwood Lake Parkway, Suite 101-158
Jacksonville, FL 32216
904-701-8424
jperea@torchwireless.com

EXHIBIT C

TORCH WIRELESS RATE PLANS



IDAHO SERVICE PLANS

	Essentials	Essentials 1GB	Essentials 4.5GB	Unlimited 1 GB	Unlimited 4.5GB
Tribal Lifeline Cost	-	-	No charge	No charge	\$30.00/mo.
Non-Tribal Lifeline Cost	No Charge	\$10.00/mo.	\$30.00/mo.	\$30.00/mo.	\$60.00/mo.
Non-Lifeline Cost	\$10.00/mo.	\$20.00/mo.	\$40.00/mo.	\$40.00/mo.	\$70.00/mo.
Data	-	1 GB	4.5GB	1 GB	4.5 GB
Voice Minutes	1000	1000	1000	Unlimited	Unlimited
SMS Text Messages	1000	1000	1000	Unlimited	Unlimited
Service Protection¹	Included	Included	Included	Included	Included
Free Smartphone	-	-	Included	Included	Included

Service Protection¹ – Optional; Applies to Paid Plans Only. If service is not used for 45 consecutive days, the account will move to a service protection plan, reducing the monthly cost to \$1.00/mo. Once on the protection service plan, any usage (call, text, or data) will revert the service back to the original plan and pricing.

TOP UP PLANS

	Voice	Text	Data
Add 100	\$3.00	\$1.00	\$3.00
Add 250	\$6.00	\$3.00	\$6.00
Add 500	\$10.00	\$6.00	\$10.00
Add 1000	\$15.00	\$10.00	\$15.00

Top Ups are valid for 90 days from the date of purchase. Values are assigned in the respective units.

PLAN DETAIL

Include	
• Nationwide Calling	• Caller ID
• Call Waiting	• Call Forwarding
• 3-Way Calling	• Voicemail
<ul style="list-style-type: none"> • Plan, pricing, and features offered, where coverage is available. • Plan features refresh every 30 days. • Bring Your Own Device (BYOD) service available. • No Contracts, Deposits, or Credit Check required. 	

EXHIBIT D

USAC LIFELINE CONSUMER FORMS

Lifeline Program Application Form



1. About Lifeline

Lifeline is a federal benefit that lowers the monthly cost of phone or internet service.

Rules

If you qualify, your household can get Lifeline for phone or internet service, but not both.

- If you get Lifeline for phone service, you can get the benefit for one mobile phone or one home phone, but not both.
- If you get Lifeline for internet service, you can get the benefit for your mobile phone or your home connection, but not both.
- If you get Lifeline for bundled phone and internet service, you can get the benefit for your mobile phone bundled service or your home bundled service, but not both.

Your household cannot get Lifeline from more than one phone or internet company.

You are only allowed to get one Lifeline benefit per household, **not per person**. If more than one person in your household gets Lifeline, you are breaking the FCC's rules and will lose your benefit.

What is a household?

A household is a group of people who live together and share income and expenses (even if they are not related to each other).

Do not give your benefit to another person

Lifeline is non-transferable. You cannot give your Lifeline benefit to another person, even if they qualify.

Be honest on this form

You must give accurate and true information on this form and on all Lifeline-related forms or questionnaires. If you give false or fraudulent information, you will lose your Lifeline benefit (i.e., de-enrollment or being barred from the program) and the United States government can take legal actions against you. This may include (but is not limited to) fines or imprisonment.

You may need to show other documents

If the Lifeline Program Administrator is not able to validate that you or someone in your household qualify using this form and electronic databases, you may need to provide an official document from one of the government qualifying programs or documentation that proves your annual income. You can submit copies of your official documents with this application or wait until the Lifeline Program Administrator asks you for them. To add them now, include the documents in option 1 or option 2 below:

1. If you qualify through a government program, provide a copy of a document such as an approval letter or benefit letter with the name of the person in your household who qualifies, name of the program, and issue date within the past 12 months or future expiration date.
2. If you qualify through your income, provide a copy of the prior year's state, federal, or Tribal tax return or a current income statement from an employer or paycheck stub for 3 consecutive months (or other accepted documents).

Visit lifelinesupport.org to see all acceptable document guidelines.

Apply

To apply for a Lifeline benefit, fill out the required sections of this form, initial every agreement statement, and sign on page 6.

Mail the form to this address:

USAC
Lifeline Support Center
P.O. Box 7081
London, KY 40742

Lifeline Program Application Form



3. Qualify for Lifeline

Fill out this section to show that you, your dependent, or someone in your household qualifies for Lifeline.

You can qualify through some government assistance programs or through your income (you do not need to qualify through both).

Qualify through a government program:

Check all programs that you or someone in your household have:

- Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)
- Supplemental Security Income (SSI)
- Medicaid
- Federal Public Housing Assistance (FPHA)
- Veterans Pension or Survivors Benefit Programs

Tribal Specific Programs

- Bureau of Indian Affairs (BIA) General Assistance
- Tribal Temporary Assistance for Needy Families (Tribal TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Tribal Head Start (only households that meet the income qualifying standard)

Or

Qualify through your income:

(Only fill this out if you do not qualify through a government program.)

Including you, how many people live in your household? (check one)	Is your income the same or less than the amount listed for your state and household size? <small>(only check yes or no next to your household size)</small>				
	All 48 States, DC, and Territories <small>(not Alaska and Hawaii)</small>	Alaska	Hawaii		
<input type="checkbox"/> 1	\$17,388	\$21,722	\$20,007	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 2	\$23,517	\$29,390	\$27,054	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 3	\$29,646	\$37,058	\$34,101	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 4	\$35,775	\$44,726	\$41,148	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 5	\$41,904	\$52,394	\$48,195	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 6	\$48,033	\$60,062	\$55,242	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 7	\$54,162	\$67,730	\$62,289	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> 8	\$60,291	\$75,398	\$69,336	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> If more than 8, add this amount for each extra person:	Add \$6,129	Add \$7,668	Add \$7,047	<input type="checkbox"/> Yes	<input type="checkbox"/> No

135% of the 2021 Federal Poverty Guidelines
*The Federal Poverty Guidelines are typically updated at the end of January.

Lifeline Program Application Form



4. Agreement

I agree, under penalty of perjury, to the following statements:

You must initial next to each statement.

Initial I (or my dependent or other person in my household) currently get benefits from the government program(s) listed on this form or my annual household income is 135% or less than the Federal Poverty Guidelines (the amount listed in the Federal Poverty Guidelines table on this form).

Initial I agree that if I move I will give my service provider my new address within 30 days.

Initial I understand that I have to tell my service provider within 30 days if I do not qualify for Lifeline anymore, including:

- 1) I, or the person in my household that qualifies, do not qualify through a government program or income anymore.
- 2) Either I or someone in my household gets more than one Lifeline benefit (including more than one Lifeline broadband internet service, more than one Lifeline telephone service, or both Lifeline telephone and Lifeline broadband internet services).

Initial I know that my household can only get one Lifeline benefit and, to the best of my knowledge, my household is not getting more than one Lifeline benefit.

Initial I agree that all of the information I provide on this form may be collected, used, shared, and retained for the purposes of applying for and/or receiving the Lifeline Program benefit. I understand that if this information is not provided to the Lifeline Program Administrator, I will not be able to get Lifeline benefits. If the laws of my state or Tribal government require it, I agree that the state or Tribal government may share information about my benefits for a qualifying program with the Lifeline Program Administrator. The information shared by the state or Tribal government will be used only to help find out if I can get a Lifeline Program benefit.

Initial All the answers and agreements that I provided on this form are true and correct to the best of my knowledge.

Initial I know that willingly giving false or fraudulent information to get Lifeline Program benefits is punishable by law and can result in fines, jail time, de-enrollment, or being barred from the program.

Initial My service provider may have to check whether I still qualify at any time. If I need to recertify (renew) my Lifeline benefit, I understand that I have to respond by the deadline or I will be removed from the Lifeline Program and my Lifeline benefit will stop.

Initial I was truthful about whether or not I am a resident of Tribal lands, as defined in section 2 of this form.

Signature	Today's Date
<input style="width: 95%; height: 25px;" type="text"/>	<input style="width: 95%; height: 25px;" type="text"/>



Notice

PAPERWORK REDUCTION ACT NOTICE: Section 54.410 of the Federal Communications Commission's rules requires all Lifeline subscribers to demonstrate their eligibility to receive Lifeline services. This collection of information stems from the FCC's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. §254. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.). The data provided in response to this information collection will be used by USAC to verify the applicant's eligibility for Lifeline services.

We have estimated that each response to this collection of information will take, on average, between 0.25 and 0.75 hours. Our estimate includes the time to read the questions, look through existing records, gather the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, OMD-PERF, Paperwork Reduction Project (3060-0819), Washington, D.C. 20554. We also will accept your comments via the Internet if you send them to PRA@fcc.gov. Please DO NOT SEND COMPLETED DATA COLLECTION FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid Office of Management and Budget (OMB) control number. This collection has been assigned an OMB control number of 3060-0819.

The Commission is authorized under the Communications Act of 1934, as amended, to collect the information we request on this form. If we believe there may be a violation or potential violation of a statute or a Commission regulation, rule, or order, your response may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order.

If you do not provide the information we request on this form, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, P.L. No. 104-13, 44 U.S.C. § 3501, et seq.

PRIVACY ACT STATEMENT: The Privacy Act is a law that requires the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) to explain why we are asking individuals for personal information and what we are going to do with this information after we collect it.

Authority: Section 254 of the Communications Act (47 U.S.C. § 254), as amended, 47 U.S.C. §254, authorizes the FCC to operate the Lifeline Program. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.).

Purpose: We are collecting this personal information so we can verify that you qualify for the Lifeline Program and so we can efficiently provide Lifeline services to you. We access, maintain and use your personal information in the manner described in the Lifeline System of Records Notice (SORN), FCC/WCB-1, which we have published in 82 Fed. Reg. 38686 (Aug. 15, 2017).

Routine Uses: We may share the personal information you enter into this form with other parties for specific purposes, such as: with contractors that help us operate the Lifeline Program; with other federal and state government agencies that help us determine your Lifeline eligibility; with the telecommunications companies that provide you Lifeline service; and with law enforcement and other officials investigating potential violations of Lifeline rules.

A complete listing of the ways we may use your information is published in the Lifeline SORN described in the "Purpose" paragraph of this statement.

Disclosure: You are not required to provide the information we are requesting, but if you do not, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

Lifeline Program Household Worksheet



About Lifeline

Lifeline is a benefit that lowers the monthly cost of phone or internet service (not both). You are only allowed to get one Lifeline benefit per household, not per person.

What this worksheet is for

Use this worksheet if someone else at your address gets Lifeline. The answers to these questions will help you find out if there is more than one household at your address.

What is a household?

A household is a group of people who live together and share income and expenses (even if they are not related to each other).

Examples of one household:

- A married couple who live together are one household. They must share one Lifeline benefit.
- A parent/guardian and child who live together are one household. They must share one Lifeline benefit.
- An adult who lives with friends or family who financially support him/her are one household. They must share one Lifeline benefit.

Examples of more than one household:

- 4 roommates who live together but do not share money are 4 households. They can have one Lifeline benefit each, 4 total.
- 30 seniors who live in an assisted-living home are 30 households. They can have one Lifeline benefit each, 30 total.

Household expenses

A household shares expenses. Household expenses include, but are not limited to, food, healthcare expenses, and the cost of renting or paying a mortgage on your place of residence and utilities.

Income

Households share income. Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Lifeline Program Household Worksheet



Can you apply?

Follow this decision tree to confirm if you qualify for the Lifeline Program.

1. Do you live with another adult?

Adults are people who are 18 years old or older, or who are emancipated minors. This can include a spouse, domestic partner, parent, adult son or daughter, adult in your family, adult roommate, etc.

Yes

If yes, answer question 2

No

2. Do they get Lifeline?

Yes

If yes, answer question 3

No

3. Do you share money (income and expenses) with them?

This can be the cost of bills, food, etc., and income. If you are married, you should check yes for this question.

Yes

No

You can apply for Lifeline. You live in a household that does not get Lifeline yet. Please *initial* line **B** on page 4, *and sign* and date the worksheet.

Check this box

You do not qualify for Lifeline because someone in your household already gets the benefit. You are only allowed to get one Lifeline discount per household, not per person.

Check this box

You can apply for Lifeline. You live at an address with more than one household and your household does not get Lifeline yet. Please *initial* lines **A** and **B** on page 4, *and sign* and date the worksheet.

Check this box

Lifeline Program Household Worksheet



Agreement

Please initial the agreement below and sign and date this worksheet. Submit this worksheet to your service provider with your Lifeline Program Application Form.

Initial

A I live at an address with more than one household.

Initial

B I understand that the one-per-household limit is a Federal Communications Commission (FCC) rule and I will lose my Lifeline benefit if I break this rule.

Signature

Today's Date

I consent to let USAC contact me at my Lifeline phone number for important reminders and updates to my Lifeline service. Message and data rates may apply. Text STOP to end messages.

Notice

NOTICE: Section 54.410 of the Federal Communications Commission's rules requires all Lifeline subscribers to demonstrate their eligibility to receive Lifeline services. If more than one person at the same address is applying for Lifeline service, all applicants must submit a Household Worksheet. This collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. §254. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.). The data provided in response to this information collection will be used by USAC to verify the applicant's eligibility for Lifeline services.

We have estimated that each response to this collection of information will take, on average, 0.25 hours. Our estimate includes the time to read and complete the form and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, OMD-PERM, Paperwork Reduction Project (3060-0819), Washington, D.C. 20554. We also will accept your comments via the Internet if you send them to PRA@fcc.gov. Please DO NOT SEND COMPLETED DATA COLLECTION FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid Office of Management and Budget (OMB) control number. This collection has been assigned an OMB control number of 3060-0819.

The Commission is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information that you provide to determine your eligibility for Lifeline services. If we believe there may be a violation or potential violation of a statute or a Commission regulation, rule, or order, your form may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order. In certain cases, the information in your form may be disclosed to the Department of Justice, court, or other adjudicative body when (a) the Commission; (b) any employee of the Commission; or (c) the United States government, is a party to a proceeding before the body or has an interest in the proceeding.

If you do not provide the information we request on this form, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, P.L. No. 104-13, 44 U.S.C. § 3501, et seq.

PRIVACY ACT STATEMENT: The Privacy Act is a law that requires the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) to explain why we are asking individuals for personal information and what we are going to do with this information after we collect it.

Authority: Section 254 of the Communications Act (47 U.S.C. § 254), as amended, 47 U.S.C. §254, authorizes the FCC to operate the Lifeline program. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.).

Purpose: We are collecting this personal information so we can verify that you qualify for the Lifeline program and so we can efficiently provide Lifeline services to you. We access, maintain and use your personal information in the manner described in the Lifeline System of Records Notice (SORN), FCC/WCB-1, which we have published in 82 Fed. Reg. 38686 (Aug. 15, 2017).

Routine Uses: We may share the personal information you enter into this form with other parties for specific purposes, such as: with contractors that help us operate the Lifeline program; with other federal and state government agencies that help us determine your Lifeline eligibility; with the telecommunications companies that provide you Lifeline service; and with law enforcement and other officials investigating potential violations of Lifeline rules.

A complete listing of the ways we may use your information is published in the Lifeline SORN described in the "Purpose" paragraph of this statement.

Disclosure: You are not required to provide the information we are requesting, but if you do not, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

EXHIBIT E

TORCH WIRELESS SAMPLE ADVERTISING



TORCH WIRELESS

Qualified Lifeline Applicants Eligible for

FREE PHONE SERVICE & SMARTPHONE

1000 MINUTES
1000 TEXT MESSAGES
4.5 GB of DATA

NO CONTRACTS
NO DEPOSIT
NO CREDIT CHECK

Additional Prepaid and Unlimited Plans Available.



SEE BACK FOR HOW TO QUALIFY

VISIT
TORCHWIRELESS.COM

CALL
1-877-99-TORCH ⁸⁻⁷⁶²⁴

LIFELINE PROGRAM GUIDELINES

Participation in the Lifeline program is available to eligible low-income consumers with proper proof of eligibility. Participation is limited to one person per household. You may be eligible for discounted and/or free cell phone service based on your income or if you participate in an eligible program. If you live on federally recognized Tribal lands, you can qualify for Tribal Lifeline.

QUALIFYING PROGRAMS

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps.
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA)
- Veterans Pension and Survivors Benefit
- Bureau of Indian Affairs General Assistance
- Head Start (households meeting the income qualifying standard)
- Tribal Temporary Assistance for Needy Families (Tribal TANF)
- Food Distribution Program on Indian Reservations

Participation in any of the listed government assistance programs or qualification via specific income-based criteria makes you eligible for the Lifeline Program. Lifeline service is non-transferable and is limited to one Lifeline discount per household - a group of people who live together and share income and expenses (even if they are not related to each other).

Lifeline is a federal benefit that lowers the monthly cost of phone or internet service.

SERVICE PLANS

Lifeline plans are only available for qualified applicants. Additional plans available for applicants that do not qualify. Plan availability may vary, based on coverage; details and prices are subject to change.

Company selected smartphone available for new enrollments, on select plans.

ALL TORCH WIRELESS PLANS INCLUDE

- Caller ID
- Call Waiting
- Call Forwarding
- 3-Way Calling
- Voicemail
- Nationwide Calling

Service Plan Protection and
Topups Available.

Contact us at 1-877-998-6724 to learn more about our plans, coverage, and how to get started.



VISIT
TORCHWIRELESS.COM

CALL
1-877-99-TORCH ⁸⁻⁷⁶²⁴

EXHIBIT F

COVERAGE ZIP CODES

Torch Wireless - Idaho Current Zip Code Coverage

83201	83271	83352	83467	83630	83711	83844
83202	83272	83353	83468	83631	83712	83845
83203	83274	83354	83501	83632	83713	83846
83204	83276	83355	83520	83633	83714	83847
83205	83277	83401	83522	83634	83715	83849
83206	83281	83402	83523	83635	83716	83850
83209	83283	83403	83524	83636	83717	83851
83210	83285	83404	83526	83638	83719	83852
83211	83286	83405	83530	83639	83720	83854
83212	83287	83406	83531	83641	83722	83855
83213	83301	83415	83533	83642	83724	83856
83214	83302	83420	83535	83643	83725	83857
83215	83303	83421	83536	83644	83726	83858
83217	83311	83422	83537	83645	83728	83860
83218	83313	83423	83540	83646	83729	83864
83220	83314	83424	83541	83647	83731	83865
83221	83316	83425	83543	83648	83732	83867
83223	83318	83427	83545	83650	83735	83868
83226	83320	83428	83548	83651	83756	83869
83228	83321	83429	83552	83652	83799	83870
83230	83322	83431	83553	83653	83801	83871
83232	83323	83433	83554	83654	83803	83872
83233	83324	83434	83555	83655	83804	83876
83234	83325	83435	83601	83656	83805	83877
83235	83327	83436	83602	83657	83809	00056
83236	83328	83438	83604	83660	83810	
83237	83330	83440	83605	83661	83811	
83239	83332	83441	83606	83669	83813	
83241	83333	83442	83607	83670	83814	
83243	83334	83443	83610	83672	83815	
83244	83335	83444	83611	83676	83816	
83245	83336	83445	83612	83680	83822	
83246	83337	83446	83615	83686	83824	
83250	83338	83448	83616	83687	83825	
83251	83340	83449	83617	83701	83832	
83252	83341	83450	83619	83702	83833	
83254	83342	83451	83622	83703	83835	
83255	83343	83452	83623	83704	83836	
83256	83344	83454	83624	83705	83839	
83261	83346	83455	83626	83706	83840	
83262	83347	83460	83627	83707	83841	
83263	83348	83462	83628	83708	83842	
83349	83350	83464	83629	83709	83843	

EXHIBIT G

TORCH WIRELESS EXECUTIVE BIOGRAPHIES

Jorge E. Perea | Chief Executive Officer

Jacksonville, FL

Jorge E. Perea is the Chief Executive Officer for Torch Wireless, with overall responsibility of the corporate direction, strategy, and governance.

With over 25 years of experience in senior corporate and multiple small business roles, Mr. Perea has been responsible for the successful execution of strategic decisions of new businesses and products, with strong expertise in operations management, regulatory adherence, performance management, and communications. Prior to assuming the Chief Operating Officer role for Torch Wireless, Mr. Perea served as a Management Executive for a fortune 50 financial institution and has been a partner with an independent servicing firm, focused on telecom regulatory and service strategy.

A first-generation Colombian-American, Mr. Perea understands the impact of underserved, low-income communities and has sought an opportunity to help support and enable communities in need of basic services. In 2016 he co-founded Torch Wireless as an opportunity to align his work and experience in ways that could help support this principle.

Mr. Perea holds a Bachelors of Business Administration from the University of North Florida and is a certified Six Sigma Greenbelt and trained Blackbelt. He has served on multiple boards within the community and currently serves as President of the Board of Directors for a mixed-use property association. He remains active in the community and is a member of several organizations including the Jacksonville Community Council, Inc. (JCCI) and the Jacksonville Regional Chamber of Commerce.

Anatoliy Budnik | Chief Operating Officer

Jacksonville, FL

Anatoliy Budnik is the Chief Operating Officer for Torch Wireless, with overall responsibility for oversight and execution of the corporation's operations.

Having established business in the automotive industry for the past two decades, Anatoliy Budnik founded Breitling Autoworks in 2008, where he served as president since its formation. At Breitling, Mr. Budnik was responsible for the operational and strategic direction, including product development of company operations in the United States. Breitling Autoworks provides custom modifications and work for exotic, and luxury vehicles, specializing in makes such as Lamborghini, Ferrari, and Bentley, as well as collision repair for consumers, vehicle manufactures, and distribution centers. In addition to his experience at Breitling Autoworks, Mr. Budnik was instrumental in funding and establishing the foundation for a successful home remodeling and new construction firm in 2003.

Through established relationships in the community, Mr. Budnik has had the opportunity to engage in events focused on underprivileged families and children in low income communities, leading him to establish an ETC investment program in 2015. This program focuses on providing funds to ETC companies seeking capital for the acquisition of handsets for the underserved lifeline market. After understanding the value and opportunity to improve the how families stay connected within the lifeline community, Mr. Budnik co-founded Torch Wireless in 2016.

EXHIBIT H – CONFIDENTIAL

TORCH WIRELESS NETWORK DESCRIPTION

(submitted confidentially to Idaho PUC)

