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March 23, 2017

VIA OVERNIGHT DELIVERY

Michael C. Amato, Director Communications Division California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re:

Information-Only Notification of Global Connection Inc. of America d/b/a Stand Up Wireless (U-4423-C) Regarding a Transfer of Customers from TAG Mobile, LLC

Dear Mr. Amato:

Pursuant to General Order No. 96-B, Telecommunications Industry Rule 8.6.3, Global Connection Inc. of America d/b/a Stand Up Wireless ("Global Connection") hereby submits this information-only filing to notify the California Public Utilities Commission (the "Commission") of the upcoming transfer of certain TAG Mobile, LLC ("TAG Mobile", collectively with Global Connection, the "Parties") wireless Lifeline customers to Global Connection (the "Transaction"). There will be no change in the registration information for either Party as a result of the Transaction. For the Commission's records, the Parties provide the following information:

I. THE PARTIES

A. Global Connection Inc. of America d/b/a Stand Up Wireless ("Global Connection")

Global Connection is a Georgia corporation with its principal office located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global Connection provides prepaid wireless telecommunications services under its d/b/a, Stand Up Wireless, in twenty-four (24) territories¹ and prepaid wireline local exchange and long distance services to residential customers in twenty (20) states.² Global Connection is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a

¹ Those twenty-four territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

² Those twenty states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, Texas, and Wisconsin. Global Connection is also certified but not yet providing services in Minnesota, Nebraska, New Mexico, Oregon, Washington, and West Virginia.

March 23, 2017 Notification Regarding Transfer of Customers Page **2** of **4**

wireline basis in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, South Carolina, Tennessee and Texas, and on a wireless basis in all twenty-four (24) of its wireless service territories.

Global Connection provides commercial mobile radio service ("CMRS") by using the Sprint Spectrum L.P. ("Sprint"), Verizon Wireless ("Verizon"), and T-Mobile USA ("T-Mobile") networks on a wholesale basis. Global Connection currently serves wireline and wireless Lifeline subscribers pursuant to its ETC designations in a combined twenty-nine (29) jurisdictions. Global Connection obtained its wireless identification registration (WIR) from the Commission on March 22, 2012 (U-4423-C). The Commission designated Global Connection as an ETC to provide federal Lifeline-supported wireless services in California by Resolution T-17466, adopted December 18, 2014, and authorized Global Connection as a California LifeLine Provider effective July 7, 2015 (Advice Letter 5D).

B. TAG Mobile, LLC ("TAG Mobile")

TAG Mobile, a Texas limited liability company, is headquartered at 1330 Capital Parkway, Carrollton, Texas 75006. TAG Mobile provides wireless services throughout the United States, including California, through the purchase of wireless network infrastructure and wireless transmission facilities from Sprint, Verizon and T-Mobile on a wholesale basis. TAG Mobile has been designated as an ETC to provide Lifeline services to low-income consumers on a wireless basis in numerous jurisdictions. This Commission has designated TAG Mobile (U-4411-C) as an ETC (Resolution T-17437, effective May 15, 2014) and a California LifeLine Provider (Advice Letter No. 4, effective October 16, 2014).

II. DESIGNATED CONTACTS

Correspondence or other materials concerning this Notification should be directed to:

Lance J.M. Steinhart
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Email: lsteinhart@telecomcounsel.com

III. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of a Customer Transfer Agreement, dated February 17, 2017 (the "Agreement"), TAG Mobile intends to transfer approximately 2380 wireless customers in California to Global Connection, on or around March 31, 2017. These Customers currently receive local exchange and long-distance wireless Lifeline services from TAG Mobile using the underlying Sprint wireless network. Global Connection will not assume TAG Mobile's pre-closing liabilities or obligations. TAG Mobile will continue to operate pursuant to its existing ETC and California

March 23, 2017 Notification Regarding Transfer of Customers Page **3** of **4**

LifeLine Provider designations, but will no longer serve or enroll customers utilizing the underlying Sprint wireless network.

To ensure a seamless transition and avoid customer confusion or inconvenience, the Parties have already begun providing affected customers with notice prior to the transfer in accordance with applicable state and federal regulations (i.e., thirty (30) days in advance), using the notices attached hereto as Exhibit 1.

Transferred customers have been notified that they will be placed on Global Connection's Unlimited Talk & Text and 500 Megabytes (MB) Data plan, still at no cost to the California LifeLine consumer. Global Connection will provide the transferred Lifeline customers with services on the same underlying network (i.e., acquired customers currently on the Sprint network will remain on the Sprint network). Any future changes to the rates, terms, and conditions of Global Connection's Lifeline service will be made consistent with Commission requirements. Moreover, because these customers will continue to be served utilizing the same underlying network, they will be able to continue using the same handset device and will enjoy access to the same coverage area without disruption as a result of the Transaction.

Also, because TAG Mobile and Global Connection utilize the same underlying carrier and third party vendor for back office support, there will be no internal period for transition of customer records—upon consummation of the Transaction, Global Connection will have immediate visibility into and control of the respective customer records in its back office systems. Global Connection and its representatives have coordinated with the California LifeLine Team at the Commission and with the California Third Party LifeLine Administrator ("TPA") to review all of the steps required for the transfer of TAG Mobile customers to Global Connection. The Parties will notify the TPA at the earliest appropriate time for execution of the identified process. As confirmed by Communications Division Staff, there are no necessary changes to Global Connection's California LifeLine terms and conditions as a result of the Transaction.

The Parties will provide details of the customer transfer to various consumer groups in order that such groups are aware of the transfer and can address inquiries that they may receive from their constituency. To that end, the Parties plan on reaching out to representatives of TURN, the Office of Ratepayer Advocates, The Greenlining Institute, the Center for Accessible Technology, and the National Center for Consumer Law prior to the transfer of customers to provide information.

IV. PUBLIC INTEREST ANALYSIS

The Transaction is in the public interest. Upon consummation, the transferred customers will continue to receive high-quality competitive local exchange and interexchange wireless Lifeline services, now delivered by Global Connection.

The Transaction has no adverse effects for the transferred Customers, who will receive notice in advance of the proposed transfer in compliance with state and federal regulations, and may choose to remain with Global Connection or change to a new provider. TAG Mobile and Global Connection will further work together to ensure that the affected Customers experience a smooth, virtually seamless, transition.

March 23, 2017 Notification Regarding Transfer of Customers Page 4 of 4

V. CONCLUSION

The Parties respectfully request that the Commission note the Transaction for its records. The Parties have worked closely with the Commission's LifeLine Team and with the TPA to accomplish the Transaction in a manner that minimizes any interference with or disruption to the services of customers. The Parties wish to express their appreciation for the assistance provided by the LifeLine Team.

I have enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

Global Connection Inc. of America d/b/a Stand Up Wireless

Lance J.M. Steinhart
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Its Counsel

EXHIBIT 1

Customer Notices

March 1 2017

SMS Copy - CA ONLY:

Free MSG: Important notice about a change to your CA LifeLine service provider on March 31st. Click for details (www.standupwireless.com/california_notification) or call FREE 1-855-463-3525.

Content viewed when customer clicks link (within sms:

Change in Service Provider Notification

Important notice regarding a change to your wireless service

Around March 31st, your California LifeLine phone service, currently provided by TAG Mobile, LLC, will be provided by Global Connection Inc. of America d/b/a StandUP Wireless, another major provider of Lifeline services. We will make the change as seamless as possible. Your service will continue to be provided utilizing the **same nationwide network**.

What's important to know is that **you do NOT need to take any action**, and you will continue to be enrolled to receive California LifeLine wireless telephone service. NO fees will be applied in connection with the change of service provider.

With StandUP Wireless, you will continue to use your **SAME phone with the SAME telephone number**. And, you will receive UNLIMITED TALK, UNLIMITED TEXT, and 500 MB DATA. You will still receive this **service at no charge.**

StandUP Wireless will notify you once you are transferred, and will provide notice of any future changes to rates or terms and conditions of service, as required by law. As with TAG, you will not have a contract with StandUP Wireless, and have the right to change Lifeline providers.

There's no need to call. More information will be provided to you soon so watch your phone for more messages. In the meantime, you can also visit StandUP Wireless online at. http://www.standupwireless.com/california.

StandUP Wireless looks forward to serving you.

Questions or concerns? Call StandUP Wireless at any point at 1-877-331-1079 or, prior to the transfer, call TAG Mobile at 1-866-959-4918.

SMS Copy – Follow up 10 days prior to migration:

Free MSG: Important notice about a change to your CA LifeLine service provider on March 31st. Click for details (www.standupwireless.com/california notification) or call FREE 1-855-463-3525

Content viewed when customer clicks link (<u>www.standupwireless.com/california_notification</u> within SMS:

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StandUP Wireless looks forward to serving you.

Questions or concerns? Call StandUP Wireless at any point at 1-877-331-1079 or, prior to the transfer, call TAG Mobile at 1-866-959-4918.

IVR Script: Change in Service Provider Notification

Please listen to this important message.

Thank you for being a TAG Mobile customer. This message is to let you know that around March 31st, your California LifeLine phone service will be provided by StandUP Wireless, another major provider of Lifeline services. We will make the change as seamless as possible. Your service will continue to be provided utilizing the same nationwide network.

What's important to know is that you do NOT need to take any action, and NO fees will be applied in connection with the change of service provider. With StandUP Wireless, you will continue to use your SAME phone with the SAME telephone number. And, you will receive UNLIMITED TALK, UNLIMITED TEXT, and 500 MB DATA.

As with TAG, you will not have a contract with StandUP Wireless, and have the right to change Lifeline providers.

There's no need to call. More information will be provided to you soon so watch your phone for more messages. In the meantime, you can also visit StandUP Wireless online at http://www.standupwireless.com/california

StandUP Wireless looks forward to serving you. Thank you and have a great day.

To speak to a representative, please press [#].

Ref: GLC TRANSFER OF Date: 23Mar17 Dep: Wgt: 1.00 LBS

SHIPPING: SPECIAL: HANDLING: 0.00 TOTAL:

0.00 0.00 0.00 0.00

DV:

Svcs: STANDARD OVERNIGHT TRCK: 6744 5157 2780