

# **Lance J.M. Steinhart, P.C.**

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August 2, 2017

## **VIA EMAIL AND 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 Blue Jay Wireless, 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 Blue Jay Wireless, LLC (“Blue Jay”, 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) territories<sup>1</sup> and prepaid wireline local exchange and long distance services to residential customers in twenty (20) states.<sup>2</sup> Global Connection is designated as an eligible

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<sup>1</sup> 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.

<sup>2</sup> 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.

telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a 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. Blue Jay Wireless, LLC (“Blue Jay”)**

Blue Jay is a Texas limited liability company with its principal office located at 4240 International Parkway Carrollton, Texas 75007. Blue Jay has been designated as an ETC to provide Lifeline services to low-income consumers on a wireless basis in numerous jurisdictions. This Commission designated Blue Jay (U-4437-C) as an ETC and California LifeLine Provider by Resolution T-17473 issued February 2, 2016.

### **II. DESIGNATED CONTACTS**

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

Lance J.M. Steinhart  
Managing Attorney  
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1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
Tel: (770) 232-9200  
Fax: (770) 232-9208  
Email: [lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com)

### **III. DESCRIPTION OF THE TRANSACTION**

Pursuant to the terms of a customer transfer agreement (the “Agreement”), Blue Jay intends to transfer approximately 9,300 wireless California LifeLine customers to Global Connection by the end of August 2017. These Customers currently receive local exchange and long-distance wireless Lifeline services from Blue Jay and will receive the same services from Global Connection after the transfer.

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. A sample of the customer notices is attached hereto as Exhibit 1.

Transferred customers have been notified that they will remain on their existing service plan, still at no cost to the California LifeLine consumer, and they will not incur any charges or change to their service as a result of the Transaction. 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, 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 Blue Jay customers to Global Connection. The Parties will notify the TPA at the earliest appropriate time for execution of the identified process. There was only one (1) necessary change to Global Connection's California LifeLine terms and conditions as a result of the Transaction, and that was the reduction of Global Connection's cost for *additional* data; Global Connection submitted Advice Letter No. 13, which was approved effective July 31, 2017, in order to make this change.

The Parties have reached 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 in order that these various consumer groups are aware of the transfer and can address inquiries that they may receive from their constituency.

#### **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. Blue Jay and Global Connection will further work together to ensure that the affected Customers experience a smooth, virtually seamless, transition.

**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**



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*Its Counsel*

Enclosures  
cc: Anna Jew

**EXHIBIT 1**

**Customer Notices**

## CALIFORNIA NOTIFICATION

### SMS Copy:

Free MSG: Important notice about a change to your CA LifeLine service provider on 7/28. For details visit [www.standupwireless.com/california\\_notification](http://www.standupwireless.com/california_notification) or call FREE 1-855-463-3525.

**Content viewed when customer clicks link ([www.standupwireless.com/california\\_notification](http://www.standupwireless.com/california_notification) within SMS:**

#### Change in Service Provider Notification

### Important notice regarding a change to your wireless service

Around July 28<sup>th</sup>, your California LifeLine phone service, currently provided by Blue Jay Wireless, 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 continue to receive the same California LifeLine service plan you are currently on, still **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 Blue Jay Wireless, 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 1-800-544-4441 or, prior to the transfer, call Blue Jay Wireless by dialing 611 on your handset or 1-855-425-8529.

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### SMS Copy – Follow up 10 days prior to migration:

Free MSG: Important notice about a change to your CA LifeLine service provider 7/28. For details visit [www.standupwireless.com/california\\_notification](http://www.standupwireless.com/california_notification) or call FREE 1-855-463-3525

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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 1-800-544-4441 or, prior to the transfer, call Blue Jay Wireless by dialing 611 on your handset or 1-855-425-8529.

## **IVR Script: Change in Service Provider Notification**

Please listen to this important message.

Thank you for being a Blue Jay Wireless customer. This message is to let you know that around July 28<sup>th</sup> 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 continue to receive the same California LifeLine service plan you are currently on, still at no charge.

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

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 [#].