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July 2, 2018

**VIA ELECTRONIC DELIVERY**

Executive Director  
Kansas Corporation Commission  
1500 SW Arrowhead Road  
Topeka, KS 66604-4027  
(785) 271-3100

Re: Docket No. 18-GIMT-394-GIT, Annual Certification  
Global Connection Inc. of America d/b/a Stand Up Wireless

To Whom It May Concern:

Attached please find for filing in the above referenced docket Global Connection Inc. of America d/b/a Stand Up Wireless' Eligible Telecommunications Carrier Annual Certification,

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me at 678-672-2831 or etc@telecomcounsel.com.

Respectfully submitted,

*/s/ Victoria Martin*

Victoria Martin, Regulatory Specialist  
Expert Telecom Compliance, Inc.

Attachments

**BEFORE THE KANSAS CORPORATION COMMISSION**

In the Matter of Certification of Compliance	)	
with Section 254(e) of the Federal	)	
Telecommunications Act of 1996 and	)	Docket No. 18-GIMT-394-GIT
Certification of Appropriate Use of Kansas	)	
Universal Service Fund Support	)	

**GLOBAL CONNECTION INC. OF AMERICA D/B/A STAND UP WIRELESS'  
ANNUAL CERTIFICATION**

Global Connection Inc. of America d/b/a Stand Up Wireless (“Stand Up Wireless”) was designated an eligible telecommunications carrier (“ETC”) by the Kansas Corporation Commission (“Commission”) for federal Universal Service Fund (“USF”) low-income support purposes in Docket No. 12-GCAT-713-ETC by Order dated August 31, 2012. Stand Up Wireless, by its undersigned counsel, submits the following in accordance with the Order issued on April 5, 2018 in this Docket (“Order”) and Amended Order issued April 17, 2018, and respectfully requests that the Commission certify Stand Up Wireless’ continued eligibility to receive federal low income support. Attachment 6 of the Order, attached hereto as Exhibit A, is the only attachment applicable to Stand Up Wireless.

Respectfully submitted,

*/s/ Lance J.M. Steinhart*

\_\_\_\_\_  
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*Attorneys for Global Connection Inc. of America  
d/b/a Stand Up Wireless*

June 29, 2018

**Exhibit A**

**Attachment 6**

## Annual ETC Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT

1. All ETCs must provide detailed information on any outage in the prior calendar year, as that term is defined in 47 CFR 4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect: (i) at least 10% of the end users served in a designated service area; or (ii) a 911 specialty facility as defined in 47 CFR 4.5(c).

Date and time of Onset of the Outage	Description of the Outage and its Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent a Similar Situation in the Future	Number of Customers Affected

**NONE**

(If necessary, please provide additional pages.)

2. Please provide the number of requests for service from potential customers within the recipient's service areas that were unfulfilled during the prior calendar year. If applicable, please explain how your company attempted to provide service to those potential customers.

**The Company is not aware of any unfulfilled requests for service from Lifeline eligible customers in the prior calendar year.**

3. Please provide the number of complaints per 1,000 connections (fixed or mobile) in the prior calendar year.

**0**

4. A wireline ETC must certify that it is in compliance with the Commission's quality of service standards and a wireless ETC must certify that it is in compliance with the CTIA Code. **Please complete the following, as applicable to your company: See also Exhibit C**

**QUALITY OF SERVICE WIRELINE ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is COO of the Global Connections (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding Global Connections (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Global Connections (Company/ Cooperative) is in compliance with the Commission's quality of service standards as adopted in Docket No. 191,206-U.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6-26-18 (date).

Signature

Eric Schimpl

Printed/Typed Name

**QUALITY OF SERVICE WIRELESS ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is Chief Operating Officer of Global Connection Inc. of America d/b/a Stand Up Wireless (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is complying with required quality of service standards. I am binding Global Connection Inc. of America d/b/a Stand Up Wireless Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Global Connection Inc. of America d/b/a Stand Up Wireless Company/ Cooperative) is in compliance with the CTIA Code.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on 6-26-18 (date).

Signature

Eric Schimpl

Print / Typed Name

5. Each ETC must certify that it will be able to function in an emergency as set forth in 47 CFR § 54.202(a)(2). **See also Exhibit C**

**ABILITY TO FUNCTION IN AN EMERGENCY ANNUAL CERTIFICATION**

**KCC Docket Reference: 06-GIMT-446-GIT**

(Please type or print legibly)

1. My title is Chief Operating Officer of Global Connection Inc. of America d/b/a Stand Up Wireless (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative is able to function in an emergency. I am binding Global Connection Inc. of America d/b/a Stand Up Wireless (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Global Connection Inc. of America d/b/a Stand Up Wireless (Company/ Cooperative) is capable of functioning in an emergency.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_ (date).



Signature

Eric Schimpf

Printed / Typed Name

6. 47 U.S.C. § 214(e)(1)(B) requires every ETC to advertise its services throughout the service area for which it has been designated "using media of general distribution."

**Please complete the following:**

Name of Media	Type of Media	Geographic Areas Reached	Dates Published
www.standupwireless.com	Internet	Throughout service area	Ongoing

(If necessary, please attach additional pages.)

7. A competitive ITC must certify that it offers a local usage plan comparable to that of the incumbent. Please provide a description of the local usage plan(s) that is comparable to that of the incumbent and complete the certification.

Similar to incumbent offerings, Stand Up Wireless offers plan options that allow for unlimited local usage. See attached Exhibit B for a summary of Stand Up Wireless' Lifeline rate plans, which also exceed incumbent offerings in several respects. In contrast to the ILEC plans, which contain relatively small local calling areas, Stand Up Wireless' customers can use their minutes to place calls statewide (and even nationwide) because Stand Up Wireless does not constrict customers' use by imposing a local calling area requirement. Stand Up Wireless also provides Lifeline customers with E911 capabilities and access to voice mail, caller I.D., and call waiting features at no cost.

COMPARABLE LOCAL USAGE PLAN ANNUAL CERTIFICATION

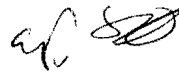
KCC Docket Reference: 06-GIMT-446-GIT

(Please type or print legibly)

1. My title is Chief Operating Officer of Global Connection Inc. of America d/b/a Stand Up Wireless (Company/ Cooperative). In this capacity, I am in a position of authority to certify whether the Company/ Cooperative offers a local usage plan comparable to that of the incumbent. I am binding Global Connection Inc. of America d/b/a Stand Up Wireless (Company/Cooperative) to the statements made in this certification.

2. By this affidavit, I certify that Global Connection Inc. of America d/b/a Stand Up Wireless (Company/ Cooperative) offers a local usage plan comparable to that of the incumbent.

I certify under penalty of perjury under the laws of the state of Kansas that the foregoing is true and correct. (Pursuant to Kan. Stat. Ann. 53-601.) Executed on \_\_\_\_\_ (date).



Signature

Eric Schimpl

Printed/Typed Name

**Exhibit B**

**Support for Attachment 6, No. 7 – Rate Plans**



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

## Lifeline Rate Plans

Terms & Conditions maintained at [www.StandUpWireless.com](http://www.StandUpWireless.com)

PLAN DESCRIPTION	VOICE	TEXT	DATA (MB)	LIFELINE PRICE
Free Voice Plan	750	Unlimited	100	\$0.00
Free Broadband Plan	500	Unlimited	1 GB	\$0.00
Free Plan Upgrade*	1,000	Unlimited	1 GB	\$0.00

\*Available to existing customers enrolled prior to 3/19/18

### Additional Minutes

Amount (\$)	Minutes
5	200
10	450
20	1000
30	1500
50	2500

### Additional Data

Amount (\$)	Data
3.95	250 MB
7.95	500 MB
15.95	1 GB

**Exhibit C**

**Support for Attachment 6, Service Quality and Emergency Functionality Certifications**

## **Service Quality and Consumer Protection**

The Company is committed to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

The Company complies with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

1. Disclose Rates and Terms of Service – These are fully disclosed in advertising as well as on the Company's website.
2. Make Coverage Maps Available – Coverage maps are available on the Company's website.
3. Provide contract terms – the Company does not employ contracts.
4. Allow a trial service – Since Lifeline customers receive free service, there is no commitment to the service on their part. If the service does not suit their needs, they can cancel service at any time without penalty.
5. Provide Specific Disclosure in advertising – All Company advertising, including its website, fully discloses charges and service parameters.
6. Separately Identify Carrier Charges from Tax on Billing Statements – the Company does not render billing statements to its prepaid customers, but for every transaction they make, service charges vs. taxes are fully described.
7. Provide Customers with the Right to Terminate Service Upon Changes to Their Contract – As mentioned, we don't employ contracts so this provision does not apply. Customers can, however, cancel service at any time without penalty.
8. Provide Ready Access to Customer Service – Customers can call customer service for free by dialing 611 or an 800 number. These numbers are disclosed on the Company's website and in advertising and customer welcome materials.
9. Promptly Respond to Customer Inquiries and Complaints from Government Agencies – We promptly respond to all complaints. If a customer care representative cannot help a customer, we have an escalation process. The Company is committed to resolving customer questions, concerns and complaints in a swift and satisfactory manner.
10. Privacy Policy – The Company protects the privacy of customer information in accordance with applicable federal and state laws. Our privacy policy is available, via link, on every page of the Company's website.
11. Provide Consumers with Free Notifications for Voice, Data and Messaging Usage, and International Roaming – Because the Company's service is prepaid, customers are not able to incur overage charges. However, the Company provides, at no charge, (a) a notification to consumers of domestic wireless plans that include limited data allowances when consumers approach their allowance for data usage; (b) a notification to consumers of domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach their allowance for those services; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. The Company also clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

12. Abide by the following principles regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets, (“mobile wireless devices”) that are locked by or at the direction of the carrier –

- (1) Disclosure. The Company has posted on its website its clear, concise, and readily accessible policy on postpaid and/or prepaid mobile wireless device unlocking.
- (2) Postpaid Unlocking Policy. Not Applicable.
- (3) Prepaid Unlocking Policy. Upon request, the Company will unlock prepaid mobile wireless devices no later than one year after initial activation, consistent with reasonable time, payment or usage requirements.
- (4) Notice. The Company will clearly notify customers that their devices are eligible for unlocking at the time when their devices are eligible for unlocking or automatically unlock devices remotely when devices are eligible for unlocking, without additional fee. The Company reserves the right to charge non-customers/nonformer-customers with a reasonable fee for unlocking requests. Notice to prepaid customers may occur at point of sale, at the time of eligibility, or through a clear and concise statement of policy on the Company’s website.
- (5) Response Time. Within two business days after receiving a request, the Company will unlock eligible mobile wireless devices or initiate a request to the OEM to unlock the eligible device, or provide an explanation of why the device does not qualify for unlocking, or why the carrier reasonably needs additional time to process the request.
- (6) Deployed Personnel Unlocking Policy. The Company will unlock mobile wireless devices for deployed military personnel who are customers in good standing upon provision of deployment papers.

The Company reserves the right to decline an unlock request if it has a reasonable basis to believe the request is fraudulent or the device is stolen.

## **Functionality in Emergency Situations**

As a reseller, the Company relies upon its underlying facilities-based carriers for functionality in emergency situations. Pursuant to existing agreements, the Company obtains from its underlying facilities-based carriers (i.e. Sprint and T-Mobile) the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator ("MVNO"). Through these agreements, the Company provides to its customers the same ability to remain functional in emergency situations as currently provided by the underlying carriers to their own customers. These Tier I underlying carriers have redundancies, back-up generator power and an extensive disaster recovery program, as well as reasonable amounts of back-up power and the ability to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations. As an MVNO, these capabilities benefit Stand UP Wireless customers.