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August 10, 2016

Chairman, Tennessee Regulatory Authority
c/o Ms. Sharla Dillon, Dockets and Records Manager
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Re: **Docket No. 16-00080**; Global Connection Inc. of America; Petition for Designation as a Wireline Eligible Telecommunications Carrier in the State of Tennessee: **Supplement**

Dear Ms. Dillon,

On July 15, 2016, Global Connection Inc. of America (Global Connection or the Company) submitted the above-referenced petition to the Authority for designation as a wireline eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers in Tennessee. At the time of filing, the Company's Federal Communications Commission (FCC) Compliance Plan, included as Exhibit C to the petition, was still under review by FCC staff. Global Connection's Compliance Plan has now been approved by the FCC, effective today. The Company submits this letter, with a copy of the FCC approval notice, to update its petition.¹

An electronic copy of this filing is being submitted concurrently pursuant to Tennessee Regulatory Authority Rule § 1220-1-1-.03(7). Please date-stamp the duplicate copy of this submission upon receipt and return it in the self-addressed envelope provided. If there are any questions concerning this filing, please contact me at (202) 945-6649 or via email at wbrantl@kelleydrye.com. Thank you in advance for your assistance with this matter.

Respectfully submitted,



Winafred Brantl

Attachment

¹ This filing responds as well to the July 21, 2016 letter from David Foster, Utilities Division Chief, requesting documentation of FCC approval of the Company's Compliance Plan.



PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

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DA 16-905

Released: August 10, 2016

WIRELINE COMPETITION BUREAU APPROVES THE WIRELINE COMPLIANCE PLANS OF GLOBAL CONNECTION AND PHONE CLUB CORPORATION

WC Docket No. 09-197
WC Docket No. 11-42

The Wireline Competition Bureau (Bureau) approves the wireline compliance plans¹ of Global Connection, Inc. of America and Phone Club Corporation, filed pursuant to the *2015 Lifeline FNPRM and Order*² and the *2012 Lifeline Reform Order*,³ as a condition of obtaining forbearance from the facilities requirement of the Communications Act of 1934, as amended (the Act), for the continued provision of Lifeline service.⁴

In the *2015 Lifeline FNPRM and Order*, the Commission amended the Lifeline program rules to eliminate Lifeline reimbursement for wholesale service provided to resellers.⁵ Only ETCs providing Lifeline service directly to the consumer may seek reimbursement from the Lifeline program for the service provided.⁶ Effective August 15, 2016, non-ETC resellers will no longer be eligible to receive support for the provision of Lifeline service, and they must obtain approval of a Lifeline compliance plan in order to obtain ETC designations from state regulators or the Commission.

Global Connection, Inc. currently provides resold wireline Lifeline service to nearly 5,000 eligible customers in states where it does not have an ETC designation for its wireline services.⁷ Phone Club Corporation provides resold wireline Lifeline service in Florida, where it does not have an ETC designation.⁸ Accordingly, Global Connection, Inc. and Phone Club Corporation each seek approval of their respective amended Lifeline compliance plans for wireline service as prerequisites to obtaining the

¹ See Revised Wireline Compliance Plan of Global Connection Inc. of America, WC Docket No. 09-197, 11-42 (filed Jul. 14, 2016); Revised Compliance Plan of Phone Club Corporation, WC Docket No. 09-197, 11-42 (filed July 26, 2016).

² *In the Matter of Lifeline & Link Up Reform & Modernization*, 30 FCC Rcd 7818 (2015) (*2015 Lifeline FNPRM and Order*).

³ *Lifeline and Link Up Reform and Modernization et al*, 27 FCC Rcd 6656 (2012) (*2012 Lifeline Reform Order*).

⁴ See *id.*, 27 FCC Rcd at 6816, paras. 379-380.

⁵ *2015 Lifeline FNPRM and Order*, 30 FCC Rcd at 7899, para. 244.

⁶ *Id.*

⁷ Letter from John Heitmann and Joshua Guyan, Counsel to Global Connection Inc. of America, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 09-197, 11-42, at 3 (filed Jul. 14, 2016) (Global Connection Letter).

⁸ Revised Compliance Plan of Phone Club Corporation at 2-3.

necessary ETC designations from the relevant state commissions and preventing any disruption of the Lifeline benefit for impacted wireline customers.⁹

The Act provides that in order to be designated as an eligible telecommunications carrier for the purpose of universal service support, a carrier must “offer the services that are supported by Federal universal service support mechanisms . . . either using its own facilities or a combination of its own facilities and resale of another carrier’s services”¹⁰ In the 2012 *Lifeline Reform Order*, the Commission found that a grant of blanket forbearance of the facilities requirement, subject to certain public safety and compliance obligations, is appropriate for carriers seeking to provide Lifeline-only service.¹¹ The Commission also conditionally granted forbearance from the Act’s facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.¹²

The Bureau has reviewed Global Connection Inc.’s and Phone Club Corporation’s wireline compliance plans for conformance with the 2015 *Lifeline FNPRM and Order* and the 2012 *Lifeline Reform Order*, and now approves the compliance plans.

Filings, including the above-discussed compliance plans, and comments are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from the Commission’s duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, telephone: (202) 488-5300, fax: (202) 448-5563, or via email www.bcpweb.com.

People with Disabilities: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at (202) 418-7400 or TTY (202) 418-0484.

For further information, please contact Nathan Eagan, Telecommunications Access Policy Division, Wireline Competition Bureau at (202) 418-0991 or TTY (202) 418-0484.

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⁹ *Id.* at 2; Global Connection Letter at 3.

¹⁰ 47 U.S.C. § 214(e)(1)(A).

¹¹ See 2012 *Lifeline Reform Order*, 27 FCC Rcd at 6813-18, paras. 368-381.

¹² See *id.*, 27 FCC Rcd at 6814, 6819, paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the 2012 *Lifeline Reform Order*. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, 27 FCC Rcd 2186 (WCB 2012).