

STEVENS & LEE  
LAWYERS & CONSULTANTS

17 North Second Street  
16th Floor  
Harrisburg, PA 17101  
(717) 234-1090 Fax (717) 234-1099  
www.stevenslee.com

Direct Dial: (717) 255-7365  
Email: mag@stevenslee.com  
Direct Fax: (610) 988-0852

December 10, 2019

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**RE: Petition of Velocity.Net Communications, Inc. For Designation as an Eligible  
Telecommunications Carrier**  
**Docket No. P-2018-3006180**

Dear Secretary Chiavetta:

Enclosed please find the supplemental responses of Velocity.Net Communications, Inc. to the Bureau of Consumer Services data requests, Set II in the above-captioned matter. This filing includes the following revised documents, per the request of the Bureau of Consumer Services:

- Revised Marketing Brochure
- Revised Lifeline Tariff Supplement
- Revised Lifeline Addendum for Subscriber Agreement
- Mock-up of Bi-annual Bill Insert/Message

Should you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Tiffany Tran, Esq., (via Email)  
Theresa Mingarell, BCS (via email)

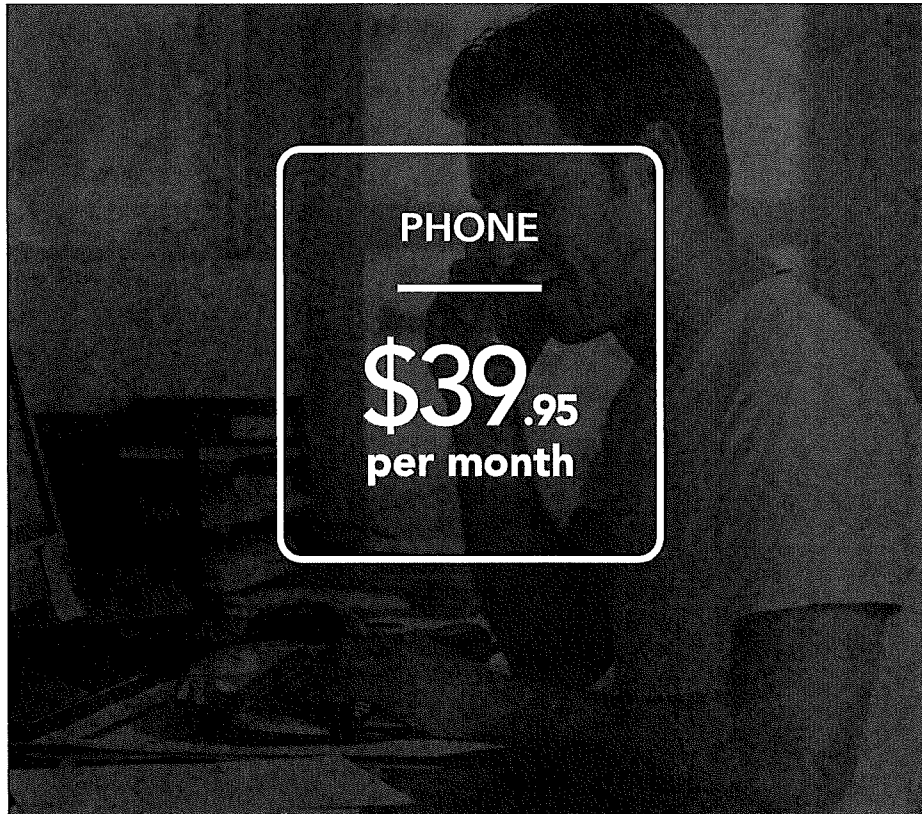
# VNET

## fiber

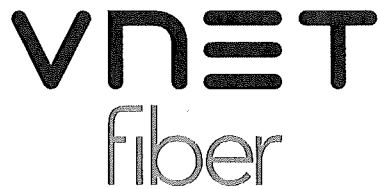
Introducing VNET Fiber's  
**Lifeline Service**

If you qualify for the Lifeline Service  
with VNET Fiber you will receive:

- Free Caller ID
- Free Forward to Mobile
- Free Voice Mail
- Free Robo-Call Blocking
- Free Call Waiting
- Unlimited Nationwide Calling



Call Us Today at 814-636-1500



Lifeline is a government assistance program. Only eligible customers may enroll in the plan.

See if you qualify for Lifeline service. Service is limited to ONE Lifeline plan per household.

### **TO QUALIFY:**

Household income at or below 135% of Fed poverty guidelines for household size or Household participation in one of the following federal, state or Tribal assistance programs: Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income, Federal Public Housing Assistance or Veteran's Pension or Survivor's Pension Benefit. Supporting documentation must be presented at the time of enrollment.

Annual recertification is necessary for continued enrollment.

All terms and conditions of service as described herein apply to services provided under the Lifeline Plan. Customers understand and agree that by signing up for a Lifeline Plan with VNET Fiber, they do not have a Lifeline Plan with any other carrier, wireline or wireless, and further agree to comply with any documentation or verification necessary to confirm that they qualify for Lifeline. In addition, Customer acknowledges that Lifeline Plan enrollment may be terminated upon notification at any time by VNET Fiber if the federal and state Lifeline Plans are changed or terminated; if the customer no longer qualifies for Lifeline; if VNET Fiber discontinues its Lifeline plans; or if Customer breaches the terms and conditions. The national verifier will contact the Customer to recertify annually. If Customer fails to complete an annual audit within sixty (60) days of the required verification dates, customers will be de-enrolled from the Lifeline Plan. Customer agrees not to give away, resell, or offer to resell the VNET Fiber equipment. VNET Fiber Lifeline Plans are supported by the government assistance "Lifeline Plan". Proof of eligibility is required, such as an eligible plan card or statement of benefits. If you willfully make a false statement to obtain a VNET Fiber Lifeline Plan, you can be punished by fine or imprisonment, or you can be barred from the plan.

#### **Lifeline Support Center**

PO Box 7081  
London, KY 40742  
800-234-9473

Customers may contact the Pennsylvania Public Utility Commission Bureau of Consumer Services with any unresolved issues at:

#### **VNET Fiber Service**

1-814-636-1500  
[www.vnetfiber.com](http://www.vnetfiber.com)

#### **Pennsylvania Public Utility Commission**

PO Box 3265  
Harrisburg, PA 17105-3265  
1-800-692-7380  
[www.puc.pa.gov](http://www.puc.pa.gov)

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COMPETITIVE LOCAL EXCHANGE CARRIER  
**SECTION 10 – LIFELINE SERVICE**

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10.1 This Sections sets forth the additional terms and conditions that apply to customers who receive Lifeline services from the Company. Lifeline is a federal government assistance program.

10.2 Eligibility/Recertification

Lifeline service is available to qualified residential customers. The Lifeline benefit is not transferrable pursuant to 47 C.F.R. 54.405(c).

Service is limited to one service per qualified customer or household.

Customers may qualify for Lifeline Service if their household income level is at or below 135% Federal Poverty Income Guidelines for a household of that size; or if a member of the customer's household receives benefits from one of the following federal assistance programs: - Supplemental Security Income (SSI); - Medicaid - Supplemental Nutrition Assistance Program (SNAP); Federal Public Housing Assistance -Veteran's Pension or Survivor's Pension Benefit. A household is an economic unit that consist of all adults contributing to and sharing in the income and expenses of a household. An adult is defined as being 18 years of age or older. In addition, to qualify an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service. Pennsylvania is a National Verifier state. The National Verifier certifies and recertifies subscriber's eligibility for Lifeline. Prior to enrollment, the Company will verify an applicant's eligibility for Lifeline service through the National Lifeline Accountability Database. VNCI is required to annually certify all Lifeline participants to ensure continued eligibility in accordance with the Lifeline regulations. If VNCI has a reasonable basis to believe that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer VNCI will notify the customer and follow the appropriate procedures under the Lifeline regulations. Lifeline customers have the responsibility to notify the VNCI within thirty (30) days of a change in eligibility status if they no longer qualify for Lifeline Service. Lifeline customers must inform VNCI within thirty (30) days if they move to a new address.

10.3 Pricing

Monthly pricing for Lifeline services is listed below. Listed pricing does not include any applicable Federal, State, or Local Taxes and Fees.

Telephone service bundled with Internet Service will be charged at the rate of \$10.00 per month per line. (Plus Taxes and Fees)

Unbundled (Lifeline) Service that is provided as a standalone offering without Internet Service will be offered at the rate of \$39.95 per line. (Plus Taxes and Fees).

10.4 Service Offering

Lifeline service includes the following standard features:

- Basic Local Exchange Service (as defined in this Tariff)
- access the Company Local Calling Services and other Services as set forth in this tariff;
- access interexchange calling services of the Company and of other carriers;

Issued: \_\_\_\_\_, 2019

Effective Date: \_\_\_\_\_, 2019

Issued By: Joel Deuterman, President  
121 W. 10<sup>th</sup> St.  
Erie, Pennsylvania 16501

COMPETITIVE LOCAL EXCHANGE CARRIER

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**SECTION 10 - LIFELINE SERVICE (CONT'D)**

- access (at no additional charge) to Company operators and business office for service related assistance;
- access to toll-free telecommunications services such as 800 NPA; and access to toll-free emergency services by dialing 0 or 9-1-1 (where available);
- access to relay services for the hearing and/or speech impaired.

The Company's Lifeline service includes the following:

- Free Caller ID
- Free Voice Mail
- Free Call Waiting
- Free Forward to Mobile
- Free Robo-Call Blocking

Standalone voice and bundled voice service include unlimited nationwide calling (US & Canada). The Company restricts calls to international or premium rate numbers unless access is requested in writing.

Basic Local Exchange Services cannot be used to originate calls to caller-paid information services (e.g., 900, 976) provided by other companies. Calls to those numbers and other numbers used for caller-paid information services will be blocked by the Company switch.

Billing

Lifeline customers will have the option to receive monthly bills and other notices required by law electronically or by U.S. Mail, upon request. No fee will be charged for furnishing a paper bill or electronic bill.

Deposits/Fees

Lifeline customers are not required to pay any deposits in order to establish or maintain service. VNCI does not charge installation fees for standard service drop installations and to activate telephone service. VNCI will not charge any fees to Lifeline applicants to enroll or receive service, other than the charges for monthly telephone service. VNCI does not charge an early termination fee.

Issued: \_\_\_\_, 2019

Effective Date: \_\_\_\_, 2019

Issued By: Joel Deuterman, President  
121 W. 10<sup>th</sup> St.  
Erie, Pennsylvania 16501

## VNCL Lifeline Addendum for Residential Voice or Broadband Service Subscriber Agreement

This Addendum sets forth the additional terms and conditions that apply to customers who receive Lifeline services from VNCL. Lifeline is a federal government assistance program.

### Eligibility/Recertification

Lifeline service is available to qualified residential customers.

Service is limited to one service per qualified household.

Customers may qualify for Lifeline Service if their household income level is at or below 135% Federal Poverty Income Guidelines for a household of that size; or if a household member receives benefits from one of the following federal assistance programs: - Supplemental Security Income (SSI); - Medicaid - Supplemental Nutrition Assistance Program (SNAP); Federal Public Housing Assistance -Veteran's Pension or Survivor's Pension Benefit.; In addition, to qualify an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.

Pennsylvania is a National Verifier state. The National Verifier certifies and recertifies subscriber's eligibility for Lifeline. Prior to enrollment, the Company will verify an applicant's eligibility for Lifeline service through the National Lifeline Accountability Database. VNCL is required to annually certify all Lifeline participants to ensure continued eligibility in accordance with the Lifeline regulations. If VNCL has a reasonable basis to believe that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer VNCL will notify the customer and follow the appropriate procedures under the Lifeline regulations. Lifeline customers have the responsibility to notify the VNCL within thirty (30) days of a change in eligibility status if they no longer qualify for Lifeline Service. Lifeline customers must inform VNCL within thirty (30) days if they move to a new address. There are several other situations that might result in a subscriber being de-enrolled:

If a telecommunications carrier has a reasonable basis to believe a subscriber is no longer eligible, the carrier will send the subscriber a notice of impending termination. The subscriber must demonstrate continued eligibility by re-certifying his or her continued eligibility (47 C.F.R. Section 54.405(e)(1), 54.410(f)(2)(iii), 54.410(d)(3)).

A carrier that provides Lifeline Program-supported service must terminate service for any subscriber who fails to demonstrate continued eligibility within the applicable time period (47 C.F.R. Section 54.405(e)(1)).

If USAC, the administrator of universal service, provides notification to a telecommunications carrier that a subscriber has **more than one discounted account**, or that more than one member of a subscriber's household is receiving service, the telecommunications carrier must de-enroll the subscriber within five business days (47 C.F.R. Section 54.405(e)(2)).

Subscribers receiving a free Lifeline-supported service must use their service at least every 30 days. Service providers must notify subscribers who do not use their service at least every 30 days that they will be de-enrolled if they do not use their service during the 15-day notice period (the “cure period”).

Service providers must provide eligible subscribers with service during the cure period. Service providers may not request reimbursement for customers who are in the cure period. If a customer uses their Lifeline-supported service during the cure period and remains enrolled in the program, service providers can adjust the previous month’s claims to include those subscribers.

Subscribers have an obligation to re-certify annually that only one member of their household receives program-supported service and they continue to be eligible.

Pricing

Monthly pricing for Lifeline services is listed below. Listed pricing does not include any applicable Federal, State, or Local Taxes and Fees.

<b>Fiber Optic Internet</b>	<b>Telephone Service</b>
\$60.00 / 300 Mb x 300 Mb	\$10.00 / Month (Unlimited Local and Long Distance)*
\$70.00 / 500 Mb x 500 mb	\$39.95 / Month (Unlimited Local and Long Distance)**
\$80.00 / 1 Gb x 1 Gb	

\*Telephone service bundled with Internet Service will be charged at the rate of \$10.00 per month per line. (Plus Taxes and Fees)

\*\*Unbundled (Lifeline) Service that is provided as a standalone offering without Internet Service will be offered at the rate of \$39.95 per line. (Plus Taxes and Fees).

Billing

Lifeline customers will have the option to receive monthly bills and other notices required by law electronically or by U.S. Mail, upon request. No fee will be charged for furnishing a paper bill or electronic bill.

Deposits/Fees

Lifeline customers are not required to pay any deposits in order to establish or maintain service. VNCI does not charge installation fees for standard service drop installations and to activate telephone service. VNCI will not charge any fees to Lifeline applicants to enroll or receive service, other than the charges for monthly telephone service. VNCI does not charge any early termination fee.

Contact Information:

VNCI

121 West 10th Street  
Erie, PA 16501  
(814) 636-1500

Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
PO Box 3265  
Harrisburg, PA 17105-3265  
1-800-692-7380

USAC Lifeline Support Center  
P.O. Box 7081  
London, KY 40742  
1-800 234-9473



## VNCl Lifeline Addendum for Residential Voice or Broadband Service Subscriber Agreement

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### Eligibility/Recertification

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Service is limited to one service per qualified household.

Customers may qualify for Lifeline Service if their household income level is at or below 135% Federal Poverty Income Guidelines for a household of that size; or if a household member receives benefits from one of the following federal assistance programs: - Supplemental Security Income (SSI); - Medicaid - Supplemental Nutrition Assistance Program (SNAP); Federal Public Housing Assistance -Veteran's Pension or Survivor's Pension Benefit.; In addition, to qualify an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.

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Contact Information:

VNCI

121 West 10th Street  
Erie, PA 16501  
(814) 636-1500

Pennsylvania Public Utility Commission  
Bureau of Consumer Services  
PO Box 3265  
Harrisburg, PA 17105-3265  
1-800-692-7380

USAC Lifeline Support Center  
P.O. Box 7081  
London, KY 40742  
1-800 234-9473

## *Mock-Up of Lifeline Bill Insert*

### **Velocity.Net Communications, Inc.'s Lifeline Program Offerings**

#### **What is Lifeline?**

Lifeline is a federal government assistance program supported by the Federal Communications Commission. Velocity.net Communications, Inc. ("VNCI") offers the following Lifeline-supported services as an Eligible Telecommunications Carrier:

- Telephone service bundled with Internet Service at the rate of \$10.00 per month per line. (Plus Taxes and Fees)
- Unbundled (Lifeline) Service that is provided as a standalone offering without Internet Service offered at the rate of \$39.95 per line. (Plus Taxes and Fees).

#### **Who can enroll in VNCI's Lifeline program?**

Customers may qualify for Lifeline Service if their household income level is at or below 135% Federal Poverty Income Guidelines for a household of that size; or if a member of the customer's household receives benefits from one of the following federal assistance programs: Supplemental Security Income (SSI); Medicaid; Supplemental Nutrition Assistance Program (SNAP); Federal Public Housing Assistance; Veteran's Pension or Survivor's Pension Benefit. Lifeline service is limited to one service per qualified customer or household. A household is an economic unit that consist of all adults contributing to and sharing in the income and expenses of a household. In addition, to qualify an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service. VNCI will independently certify an applicant's eligibility for Lifeline service through the National Lifeline Accountability Database. VNCI is required to annually certify all Lifeline participants to ensure continued eligibility in accordance with the Lifeline regulations. If VNCI has a reasonable basis to believe that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer VNCI will notify the customer and follow the appropriate procedures under the Lifeline regulations.

VNCI is required to annually certify all Lifeline participants to ensure continued eligibility. Lifeline customers have the responsibility to notify the VNCI within thirty (30) days of a change in eligibility status if they no longer qualify for Lifeline Service. Lifeline customers must inform VNCI within thirty (30) days if they move to a new address. Each household can receive Lifeline benefits from only one company, which can be a broadband, wireline and wireless service provider. Lifeline cannot be transferred to another person, but you can keep the Lifeline benefit if you move to another address. You must activate your service. Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment, or being barred from the program. Proof of eligibility is required, and only eligible customers may enroll.

#### **What are the benefits of VNCI's Lifeline program?**

Under VNCI's Lifeline program, subscribing customers receive discounted rates for voice or broadband internet service. VNCI's Lifeline program, service includes the following standard features:

- Basic Local Exchange
- access the Local Calling Services
- access interexchange calling services
- access (at no additional charge) to VNCI operators and business office for service related assistance;
- access to toll-free telecommunications services such as 800 NPA; and access to toll-free emergency services by dialing 0 or 9-1-1 (where available);
- access to relay services for the hearing and/or speech impaired.

The VNCI's Lifeline service includes the following:

- Free Caller ID
- Free Voice Mail
- Free Call Waiting
- Free Forward to Mobile
- Free Robo-Call Blocking

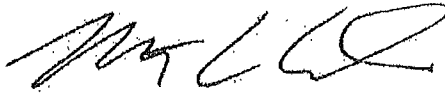
Standalone voice and bundled voice service include unlimited nationwide calling (US & Canada).

**Where can I find the application for VNCI's Lifeline services?** You must meet certain eligibility requirements in order to qualify for VNCI's Lifeline service. An application for VNCI's Lifeline service can be obtained at this website [INSERT ADDRESS], or an application can be mailed by calling [INSERT PHONE NUMBER].

**Who can I contact to ask questions?** You can contact VNCI's customer service team at [INSERT CONTACT EMAIL AND PHONE NUMBER]. In addition, to find out more information, you may also call the Universal Service Administrative Company (USAC), which administers Lifeline for the FCC by calling 888.641.8722 or by accessing their website at [www.LifelineSupport.org](http://www.LifelineSupport.org). Also, if you have an unresolved question or complaint about Lifeline service, please contact the Pennsylvania Public Utility Commission Bureau of Consumer Services at 1-800-692- 7380. All rates, terms and conditions included in this notice are subject to change. For current Velocity Lifeline information and rates, visit [INSERT LINK TO VNCI TARIFF].

**VERIFICATION**

I, Matthew Wiertel, Director of Sales and Marketing for Velocity.Net Communications, Inc. hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Date: 12/9/19

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Matthew Wiertel