

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of AmeriMex
Communications Corp. for Waiver of
Renewal Processes and Approval, as
Needed, of a Change in Control**

§
§
§
§
§

Docket No. _____

**PETITION FOR WAIVER AND
APPROVAL OF CHANGE IN CONTROL**

COMES NOW, AmeriMex Communications Corp. dba SafetyNet Wireless (hereafter “AmeriMex” or “Company”), hereby submits this Petition for waiver of any applicable requirement for renewal of its existing Eligible Telecommunications Carrier (“ETC”) designation and approval, as may be required, of an upcoming change in majority ownership of the Company. In the event that waiver or approval is not granted, AmeriMex requests that this Petition be deemed to be a request for renewal of its ETC designation.

Following the consummation of the proposed transaction, control of the Company will transfer all of the current majority ownership from the founder and current majority owner, Donald L. Aldridge, to the current minority owners and officers who are Stephen D. Klein and Jeffrey Matthews. There is no new entity or third party acquiring any interest in the Company. Since the proposed transaction will not result in a “different entity” becoming the owner of the largest voting interest in the Company, the transaction should not be considered “jurisdictional.”¹ There will be no change in the Company's name, management, operations, or service offerings as a result of the transaction. Customers will experience no change or interruption of service. The ownership transition represents an orderly succession from the Company's founder, who wishes to retire, to its existing executive leadership.

¹ 52 PA. CODE §69.901(1) states in part: “A transaction or series of transactions resulting in a new controlling interest is jurisdictional when the transaction or transactions result in a different entity becoming the beneficial holder of the largest voting interest in the utility or parent, regardless of the tier.

I. Background and Description of the Transaction

By the Order issued March 6, 2014, in Docket No. P-2013-2369557, the Commission designated the Company as an ETC in the State of Pennsylvania.

Pursuant to a Stock Purchase Agreement dated December 17, 2025, Stephen D. Klein and Jeffrey Matthews (the "Purchasers") will acquire all shares of common stock currently held by Donald L. Aldridge, representing 66.67% of the issued and outstanding shares of AmeriMex Communications Corp. The transaction will be consummated upon regulatory approval, as needed, by state utility commissions and the FCC.

Mr. Aldridge founded the Company on July 15, 1998. He wishes to retire from the business have no continuing ownership interest or management role following consummation of the transaction. The Purchasers are existing minority shareholders and officers of the Company. Mr. Klein has served as an executive officer of the Company since 2014, initially as President and subsequently as Chief Executive Officer. Mr. Klein will remain in that office. Mr. Matthews has served as Chief Technology Officer since 2014, and he will continue in that role. Following the transaction, Mr. Klein will hold 80%, and Mr. Matthews will hold 20% of the outstanding shares.

Pre- and post-transaction organizational charts are attached as Exhibit A.

II. Designated Representative

All correspondence, communications, pleadings, notices, orders and decisions relating to this Notice should be addressed to:

Mark Foster
FosterDanowsky LLP
904 West Ave, Suite 107
Austin, TX 78701
Office: (512) 708-8700
Fax: (512) 697-0058
mfoster@fosterdanowsky.com
Attorney for AmeriMex Communications Corp.

III. Waiver of ETC Renewal

Because filing for ETC renewal would subject the carrier once again to the Commission's lengthy ETC designation review process, the Commission has adopted a process for case-by-case review of the business transaction resulting in a change in corporate ownership of an ETC to determine whether circumstances warrant requiring the ETC to file for renewal of its designation.²

AmeriMex requests waiver for the ETC renewal process and requests the Commission review the facts of the change in AmeriMex's corporate ownership and decide that: (1) the plan for change in the current majority control by the Company's founder to the current minority owners who will remain as the Company's management is insubstantial; and (2) there is no potential adverse effect upon the Lifeline service offerings provided to low-income customers that may also impact the support an ETC receives from the federal Universal Service Fund.

IV. Public Interest Considerations

As stated above, there will be no change in the Company's name, management, operations, or Lifeline service offerings as a result of the transaction. Customers will experience no interruption of service. The ownership transition represents an orderly succession from the Company's founder to its existing executive leadership. Approval of this Petition would benefit the public interest and allow AmeriMex to continue providing Lifeline service to Pennsylvania customers. AmeriMex serves a critical role in the Pennsylvania telecommunications services industry by providing a competitive alternative to larger wireless providers and dedicated service to low-income customers.

V. Continued Compliance

AmeriMex continues to meet the requirements for ETC designation pursuant to Section 214(e)(2) of the federal Telecommunications Act.

² See, *Petition for Renewal of ETC Designation of Virgin Mobile USA, L.P.*, Docket No. P-2010-2155915 (Order entered September 12, 2013) (*2013 Virgin Mobile Order*).

The Company will continue to offer all of the services and functionalities detailed in 47 C.F.R § 54.101(a). AmeriMex has filed and received approval of its Compliance Plan by the FCC,³ and has made an amendment to its Compliance Plan to reflect the proposed change in ownership on December 24, 2025.⁴ Additionally, AmeriMex will advertise the availability of such services and the charges for these services using media of general distribution and commits to continue to advertise the availability of its Lifeline services. AmeriMex also meets the additional requirements set forth in the FCC Rules for obtaining ETC designation for purposes of receiving Lifeline funding support⁵ which are:

(a) Certification of compliance with the service requirements applicable to the support that it receives;

AmeriMex certifies that it is compliant with the service requirements applicable to the support that it receives.

(b) Demonstration of ability to remain functional in emergency situations;

AmeriMex relies on its underlying carriers which possess a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

(c) Demonstration that Applicant satisfies the applicable consumer protection and service quality standards;

For wireless applicants, compliance with the Cellular Telecommunications and Internet

³ *Wireline Competition Bureau Approves the Compliance Plans of AirVoice Wireless, AmeriMex Communications, Blue Jay Wireless, Millennium 2000, Nexus Communications, Platinumtel Communications, Sage Telecom, Telrite and Telscape Communications DA 12-2063* (Rel. December 26, 2012); available at <https://docs.fcc.gov/public/attachments/DA-12-2063A1.pdf>.

⁴ *Amended Compliance Plan of AmeriMex Communications Corp. d/b/a SafetyNet Wireless*, WC Dockets 09-197, 11-42 (December 24, 2025) <https://www.fcc.gov/ecfs/document/12240513223569/2>.

⁵ 47 C.F.R. § 54.202.

Association's (CTIA) Consumer Code for Wireless Service satisfies this requirement, and AmeriMex complies with the CTIA Consumer Code.

(d) Demonstration of financial and technical capability of providing the Lifeline service in compliance with subpart E of the FCC's rules and regulations;

The FCC requires a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.⁶ The FCC also has set forth relevant criteria for demonstrating such capability:

Among the relevant considerations [demonstrate its technical and financial capacity to provide the supported service] would be whether the applicant previously offered services to non-Lifeline consumers, how long it has been in business, whether the applicant intends to rely exclusively on USF disbursements to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.⁷

AmeriMex has successfully operated in Pennsylvania for over ten years. The Applicant has not relied upon, and will not be relying exclusively on Lifeline reimbursement for its operating revenues. In addition, the Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state. As such, AmeriMex meets the applicable criteria.

(e) Submission of information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan

The current service plans for Pennsylvania Lifeline-eligible customers are attached as Exhibit B.

(f) Demonstration that ETC designation is in the public interest.

⁶ 47 C.F.R. § 54.202(a)(4).

⁷ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("Lifeline Reform Order"), at ¶ 388.

AmeriMex continues to meet the requirements for ETC designation by the Commission pursuant to Section 214(e)(2) of the federal Telecommunications Act.⁸ In addition, AmeriMex complies with the standards established by the FCC for determining whether applicants for ETC status serve the public interest.⁹ The FCC has determined that applications for ETC status in "non-rural" areas are *per se* in the public interest.¹⁰

AmeriMex offers all required services and functionalities. Section 214(e)(1)(A) of the federal Telecommunications Act¹¹ requires an ETC to offer the services that are supported by federal universal service support mechanisms under section 254(c). Effective December 29, 2011, pursuant to the USF/ICC Transformation Order¹² as further clarified by the USF/ICC Order on Reconsideration,¹³ the FCC eliminated its former list of nine supported services and amended section 54.101(a) of its rules to specify that "voice telephony service" is supported by the federal universal service mechanisms. The amended Section 54.101(a) and its list of supported services reads as follows:

Voice telephony service shall be supported by federal universal service support mechanisms. The functionalities of eligible voice telephony services include voice grade access to the public switched network or its functional equivalent; minutes

⁸ 47 U.S.C. § 214(e)(2).

⁹ See *Federal-State Joint Board on Universal Service, Report and Order*, CC Docket No. 96-45, 20 FCC Rcd 6371, ¶ 40-43 (Rel. March 17, 2005).

¹⁰ *Federal-State Joint Board on Universal Service; Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, Memorandum Opinion and Order, CC Docket No. 96-45, 16 FCC Rcd 39, 45; -U 14 (Rel. Dec. 26, 2000) ("For those areas served by non-rural telephone companies, such as the state of Delaware, we believe that designation of an additional ETC based upon a demonstration that the requesting carrier complies with the statutory eligibility obligations of section 214(e)(1) is **consistent per se** with the public interest. The carrier need make **no further showing** to satisfy this requirement.") (emphasis added).

¹¹ 47 U.S.C. § 214(e)(1).

¹² *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, et al.*, WC Docket No. 10-90, *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) ("USF/ICC Transformation Order").

¹³ *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, et al.*, WC Docket No. 10-90, *et al.*, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) ("USF/ICC Order on Reconsideration").

of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation for qualifying low-income consumers (as described in subpart E of this part).

AmeriMex will continue to offer voice telephony services as described in Section 54.101 of the FCC Rules.¹⁴ To the extent that the Commission continues to require ETCs to provide those services supported by federal universal service support mechanisms previously enumerated in 47 C.F.R. § 54.101(a), AmeriMex commits to continue to satisfy state voice service requirements.

AmeriMex will continue to offer each of the services that are supported by the Federal Universal Service Fund support mechanisms under 47 U. S.C. §254(c) to any consumer in the service area for which it seeks designation as an ETC. AmeriMex is able to provide all of the supported services required by Section 54.101(a) of the FCC's Rules as follows:

1. Voice Telephony Services

As set forth in 47 C.F.R. § 54.101(a)(1), eligible Voice Telephony Services must provide the following:

- Voice Grade Access to the Public Switched Telephone Network. AmeriMex provides voice grade access to the public switched telephone network (“PSTN”) through the purchase of wholesale CMRS services from its facilities-based Underlying Carriers.
- Local Usage at No Additional Charge. AmeriMex offers rate plans that provide its customers with minutes of use for local service at no additional charge.
- Access to Emergency Services. AmeriMex provides 911 and E911 access for all of its customers to the extent the local government in its service area has implemented 911 or

¹⁴ 47 C.F.R. § 54.101(a).

E911 systems. Calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. AmeriMex also complies with the FCC's regulations governing the deployment and availability of E911 compatible handsets.

- Toll Limitation. AmeriMex need not provide toll limitation services because its offerings do not distinguish between toll and non-toll calls. In its *Lifeline Reform Order*, the FCC provided that toll limitation would no longer be deemed a supported service: "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."¹⁵ As a wireless service provider, AmeriMex's minutes do not distinguish between toll and non-toll calls; therefore, AmeriMex satisfies this requirement.

2. Broadband Internet Access Services

Broadband Internet Access Service ("BIAS") is a supported service as of December 2, 2016. The FCC has stated that BIAS consists of the ability for a user to receive "the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service." AmeriMex provides BIAS to low-income consumers via resale of its Underlying Carriers' mobile services.

WHEREFORE, based on the foregoing, AmeriMex respectfully suggests that the public interest, convenience, and necessity will continue to be furthered by the proposed change in ownership described in this Petition, and requests that the Commission take notice of this planned change in majority ownership and waive any requirement for renewal of its ETC designation. If

¹⁵ See Lifeline Reform Order at ¶ 49.

waiver is not granted, then AmeriMex, alternatively requests that the foregoing petition be deemed a request for renewal of the ETC designation to be approved as expeditiously as possible.

Respectfully Submitted,

Mark Foster

Mark Foster
Texas Bar No. 07293850
FosterDanowsky LLP
904 West Ave, Suite 107
Austin, TX 78701
Office: (512) 708-8700
Fax: (512) 697-0058
mfoster@fosterdanowsky.com

Attorney for AmeriMex Communications Corp.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of AmeriMex
Communications Corp. for Waiver of
Renewal Processes and Approval, as
Needed, of a Change in Control**

§
§
§
§
§

Docket No. _____

VERIFICATION

State of Florida

County of Pinellas

BEFORE ME, the undersigned authority who is duly authorized to administer oaths, appeared Nicholas Metherd, who after being sworn, states on oath that he is the Chief Operating Officer of AmeriMex Communications Corp. and is authorized to verify that the statements set forth in the Petition for Amendment to its ETC Designation and Approval of Change in Control are true and correct to the best of my knowledge, information and belief.



Nicholas Metherd

Sworn to and subscribed before me this 25th day of March, 2026.

[SEAL]

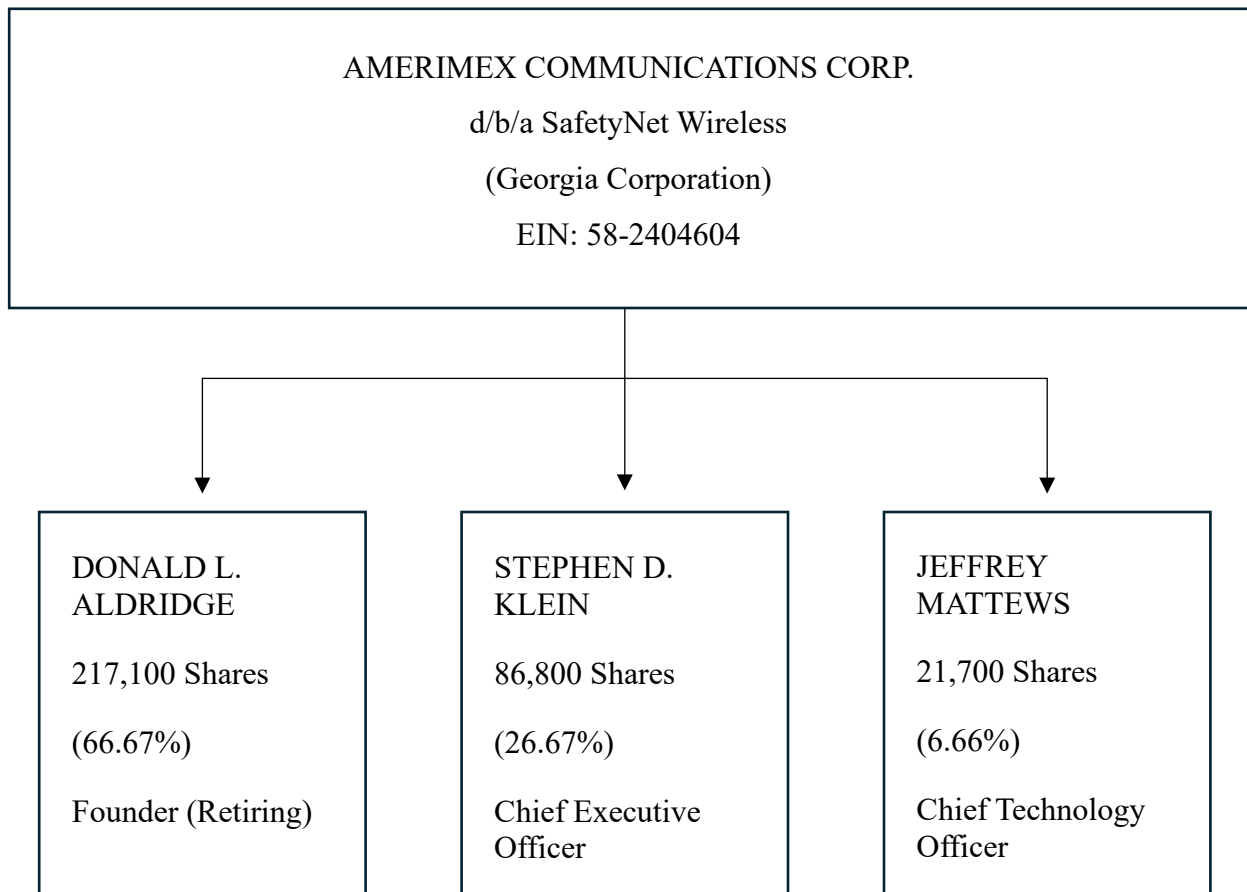




Notary Public
MAUREEN ALEGRIA

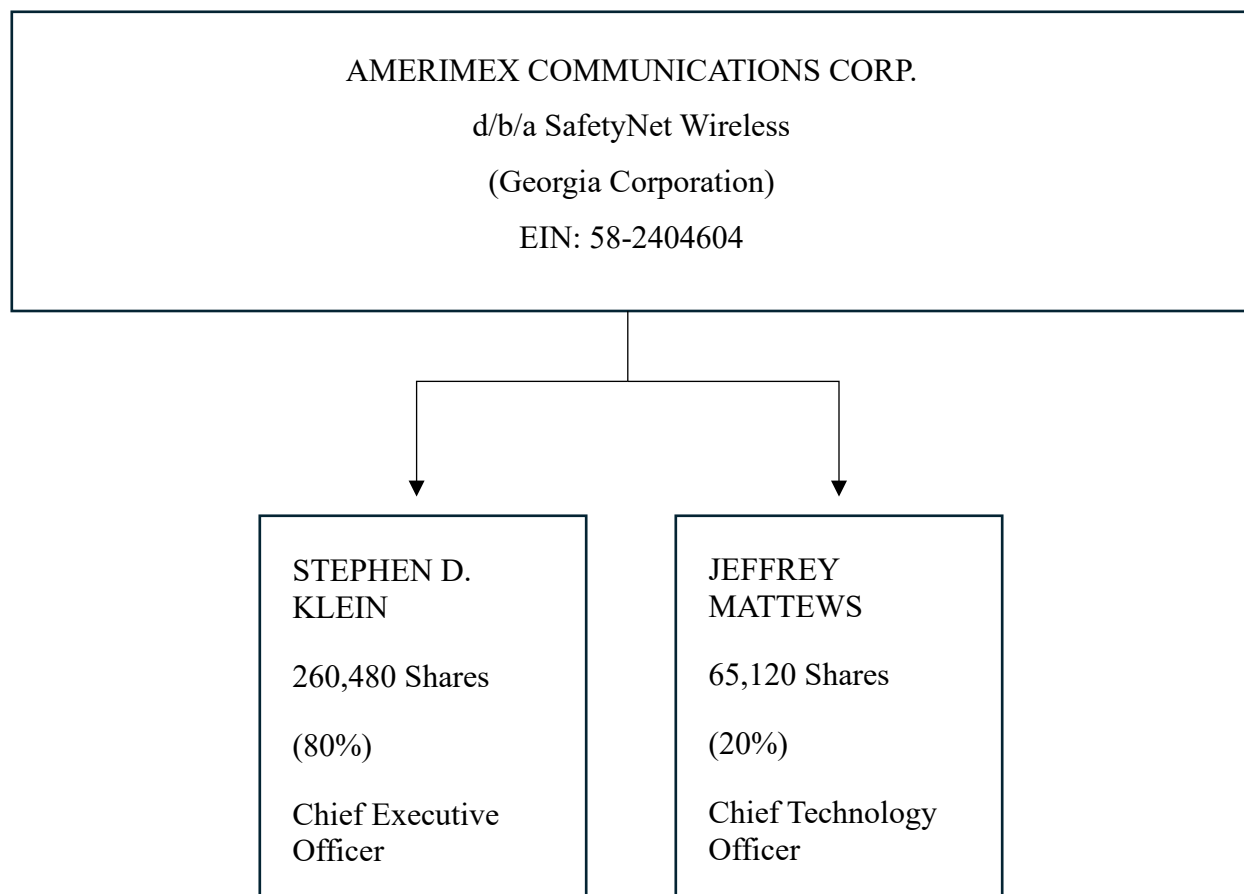
Exhibit A
Pre- and Post-Transaction Organization Charts

CHART 1: PRE-TRANSACTION OWNERSHIP STRUCTURE



Total Issued and Outstanding Shares: 325,600

CHART 2: POST-TRANSACTION OWNERSHIP STRUCTURE



Total Issued and Outstanding Shares: 325,600

TRANSACTION SUMMARY

Shareholder	Pre-Transaction	Post-Transaction	Change
Donald L. Aldridge	217,100 shares (66.67%)	0 shares (0%)	Sells all shares
Stephen D. Klein	86,800 shares (26.67%)	260,480 shares (80%)	Acquires 173,680 shares
Jeffrey Matthews	21,700 shares (6.66%)	65,120 shares (20%)	Acquires 43,420 shares
Total	325,600 shares (100%)	325,600 shares (100%)	—

OFFICERS AND DIRECTORS

Name	Position	Pre-Transaction	Post-Transaction
Donald L. Aldridge	Founder/Director	Yes	No
Stephen D. Klein	Chief Executive Officer	Yes	Yes
Jeffrey Matthews	Chief Technology Officer	Yes	Yes

NOTES

1. Transaction pursuant to Stock Purchase Agreement dated December 17, 2025.
2. Mr. Aldridge founded the Company on July 15, 1998 and is retiring from the business.
3. No change in the Company's legal name, state of incorporation, or d/b/a.
4. No third-party acquirer; Purchasers are existing minority shareholders and officers.
5. Consummation of transaction is conditioned upon Bureau acceptance of Amended Compliance Plan.

Exhibit B
Lifeline Service Offerings

The following table summarizes SafetyNet Wireless's Lifeline service plan offerings. Service offerings meet or exceed the minimum service standards established by the Commission pursuant to 47 C.F.R. § 54.408 and as announced by Wireline Competition Bureau Public Notice.

STANDARD LIFELINE PLAN (Non-Tribal)

Feature	Included
Monthly Voice Minutes	350
Monthly Data Allotment	4.5 GB
Text Messages	Unlimited
Mobile Hotspot / Tethering	Included (no additional charge)
Domestic Long Distance	Included
Caller ID	Included
Call Waiting	Included
Voicemail	Included
3-Way Calling	Included
Access to 911/E911	Included
Directory Assistance (411)	Available (per-call charges apply)
International Calling	Available (per-minute charges apply)
Monthly Subscriber Cost	\$0.00
Activation Fee	\$0.00

TRIBAL LIFELINE PLAN (Enhanced Support)

Feature	Included
Monthly Voice Minutes	Unlimited
Monthly Data Allotment	4.5 GB
Text Messages	Unlimited
Mobile Hotspot / Tethering	Included (no additional charge)
Domestic Long Distance	Included
Caller ID	Included

Call Waiting	Included
Voicemail	Included
3-Way Calling	Included
Access to 911/E911	Included
Directory Assistance (411)	Available (per-call charges apply)
International Calling	Available (per-minute charges apply)
Monthly Subscriber Cost	\$0.00
Activation Fee	\$0.00

DEVICE OPTIONS

Option	Description
Company-Provided Device	SafetyNet may provide handsets at no charge or reduced cost in certain service areas or circumstances, subject to availability.
Bring Your Own Device (BYOD)	Subscribers may use their own compatible GSM-unlocked device.
Device Features	All devices are capable of voice, data, and 911/E911 access. Devices are hearing aid compatible per 47 C.F.R. § 20.19.

SERVICE AREA

SafetyNet Wireless offers Lifeline service in the following twenty-six (26) states:

Alabama	Arizona	Arkansas	California	Colorado	Florida
Georgia	Illinois	Indiana	Kentucky	Louisiana	Maryland
Michigan	Mississippi	Missouri	Nevada	New Jersey	New York
Ohio	Oklahoma	Pennsylvania	Tennessee	Virginia	Washington
West Virginia	Wisconsin				

NETWORK AND COVERAGE

SafetyNet provides service utilizing nationwide carrier networks. Coverage is available throughout the Company's designated service areas, subject to network availability in specific locations.

TOLL LIMITATION

SafetyNet's Lifeline service includes toll limitation at no charge, consistent with 47 C.F.R. § 54.401(a)(2). The prepaid service structure prevents subscribers from incurring toll charges in excess of their service plan allowances.

MINIMUM SERVICE STANDARDS COMPLIANCE

SafetyNet's Lifeline service offerings meet or exceed the minimum service standards in effect at the time of enrollment. The Company will adjust its service offerings as necessary to comply with updated minimum service standards announced by the Wireline Competition Bureau, without the need for compliance plan amendment.

Requirement	Citation	SafetyNet Compliance
Voice Minutes	47 C.F.R. § 54.408(b)(1)	Unlimited
Data Allotment	47 C.F.R. § 54.408(b)(2)	Meets or exceeds current MSS
Mobile Hotspot	47 C.F.R. § 54.408(f)	Included, no additional charge

STATE PROGRAMS AND PARTNER OFFERINGS

In states where SafetyNet participates in state universal service programs, subscribers may receive enhanced benefits as determined by applicable state program rules. Service offerings through authorized enrollment partners may vary. All offerings meet or exceed the federal minimum service standards.

ADDITIONAL INFORMATION

For current service plan details, coverage maps, and enrollment information, consumers may visit:

Website: www.safetynetwireless.com

Customer Service: 1-888-224-3212