



ConnectTo Communications, Inc.

DBA: ConnectTo

LIFELINE SALES

Employee Handbook, Rules & Training Manual

Federal USAC / FCC and California CPUC Lifeline Program Compliance

FOR ALL EMPLOYEES INVOLVED IN LIFELINE

Sales • Marketing • Enrollment • Customer Support • QA

Issuing Company	ConnectTo Communications, Inc. (DBA: ConnectTo)
ETC Designation	Eligible Telecommunications Carrier — California
Programs Offered	Federal Lifeline + California LifeLine
Enrollment Platform	Owlup (eligibility, enrollment, activation, customer management)
Regulators	FCC, USAC, California PUC, California TPA
Audience	All ConnectTo Lifeline-facing personnel
Acknowledgment	Required signature on file
Effective Date	[Insert Effective Date]

Version

3.0

Website: www.ConnectTo.com

Lifeline Information: www.ConnectTo.com/lifeline

Phone: +1 (888) 570-6783 | Fax: +1 (818) 546-4617

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0. About ConnectTo Communications, Inc.

ConnectTo Communications, Inc. ("ConnectTo," the "Company," or "we") is a designated Eligible Telecommunications Carrier (ETC) authorized to provide federal Lifeline service and to participate in the California LifeLine program. As an ETC, ConnectTo is bound by the federal Lifeline rules adopted by the FCC and administered by USAC, and by the California LifeLine rules adopted by the California Public Utilities Commission (CPUC) and administered by the California LifeLine Third-Party Administrator (TPA).

Company Identification

Legal Name	ConnectTo Communications, Inc.
DBA / Trade Name	ConnectTo
ETC Status	Eligible Telecommunications Carrier (California)
Programs	Federal Lifeline (USAC) and California LifeLine (CPUC / TPA)
Website	www.ConnectTo.com
Lifeline Page	www.ConnectTo.com/lifeline
Main Phone	+1 (888) 570-6783
Fax	+1 (818) 546-4617
Sales Email	info@connectto.com
Customer Support Email	support@connectto.com
Careers Email	careers@connectto.com
Mailing Address	ConnectTo Communications, 555 Riverdale Dr., Suite A, Glendale, CA 91204
Sales & Support Hours	24 / 7 / 365
Office Hours	Monday – Friday, 9:00 AM – 6:00 PM Pacific Time
Compliance Officer	[Insert name, email, phone]
Enrollment Software	Owlup (see Section 6)

ACTION ITEM FOR THE COMPLIANCE OFFICER

Before this manual is distributed to employees, fill in the Compliance Officer name, email, and phone in the table above. Verify the exact URL of the Lifeline page from the ConnectTo website navigation menu and update if it differs from www.ConnectTo.com/lifeline.

All distributed copies must contain the current Compliance Officer's contact information so employees can escalate concerns and customers can reach the right person.

1. Welcome and Purpose of This Manual

Welcome to the Lifeline team at ConnectTo Communications, Inc. This Handbook is the single, authoritative reference for every ConnectTo employee, contractor, agent, vendor, and representative who participates in the sale, marketing, enrollment, recertification, transfer, de-enrollment, or customer support of Lifeline service — under both the federal Lifeline program (administered by the Universal Service Administrative Company, or USAC, under FCC rules at 47 C.F.R. Part 54, Subpart E) and the California LifeLine program (administered by the California Public Utilities Commission, or CPUC, and by the California LifeLine Third-Party Administrator under General Order 153).

Lifeline is a federal and state-funded benefit. Every dollar paid to ConnectTo through Lifeline ultimately comes from contributions made by telecommunications carriers and ratepayers. Because of this, the program is one of the most heavily audited and most strictly enforced programs in the telecommunications industry. Mistakes — even honest, well-intentioned ones — can cost ConnectTo millions of dollars in penalties, can cost ConnectTo its ETC designation, and can cost individual employees their jobs and, in some cases, can lead to criminal prosecution under federal anti-fraud statutes.

This manual exists for three purposes:

1. To put every Lifeline rule that you need to know in one place, written in plain language.
2. To give you scripts and answers so that every potential or existing ConnectTo customer receives accurate, compliant information.
3. To document — through the signed acknowledgment at the end of this manual and the Quality Assurance (QA) sign-off — that you have been trained, that you understand the rules, and that you agree to follow them.

Read this entire document. Do not skim. After completing the QA assessment at the end, you must sign the acknowledgment page and return it to your supervisor or the ConnectTo Compliance Officer before you may engage with any Lifeline customer or prospective customer in any capacity.

ZERO TOLERANCE NOTICE

Lifeline fraud is a federal offense. Violations of program rules can result in immediate termination from ConnectTo, restitution liability, civil penalties under the False Claims Act, debarment from future Lifeline participation, and criminal prosecution under 18 U.S.C. §§ 287, 371, 1001, 1341, and 1343.

Common employee violations that have resulted in termination and prosecution: enrolling ineligible subscribers, falsifying eligibility documents, signing on a customer's behalf, enrolling more than one person per household when not allowed, duplicate enrollments, sharing credentials, and offering 'incentives' prohibited by program rules.

2. The Two Lifeline Programs and Who Decides What

In California, eligible consumers may receive (a) the federal Lifeline benefit, (b) the California LifeLine benefit, or (c) both, depending on the service plan and the consumer's status. ConnectTo participates in both programs. Federal and state rules overlap but are not identical. When a federal rule and a California rule both apply, ConnectTo follows the stricter rule.

2.1 Federal Lifeline Program (FCC / USAC)

The federal Lifeline program provides a discount of up to \$9.25 per month on qualifying voice or broadband internet service for eligible low-income consumers (\$34.25 per month for consumers living on Tribal lands). Federal eligibility decisions are made by USAC through the National Verifier, not by ConnectTo. The program is governed by:

- 47 C.F.R. § 54.400 et seq. — the FCC's Lifeline rules.
- FCC Lifeline Reform Order (2012), 2016 Modernization Order, and successor orders.
- USAC's National Verifier (NV) — the centralized federal eligibility system. All federal Lifeline eligibility determinations in California go through the National Verifier.
- USAC's National Lifeline Accountability Database (NLAD) — used to enroll subscribers, prevent duplicates, and de-enroll non-usage subscribers.
- USAC's Representative Accountability Database (RAD) — every ConnectTo enrollment representative must register and obtain a unique Representative ID (Rep ID) before performing any enrollment, recertification, or transfer activity.

2.2 California LifeLine Program (CPUC + California TPA)

California LifeLine provides a state-funded discount on home phone, wireless, or bundled services for qualifying low-income California residents. California eligibility decisions are made by the California LifeLine Third-Party Administrator (TPA), under rules set by the CPUC — not by ConnectTo. The program is governed by:

- CPUC General Order 153 (the comprehensive program rulebook).
- CPUC Decisions including D.14-01-036, D.17-01-032, D.20-01-021, D.21-09-035, and successors.
- California Public Utilities Code §§ 871–884.

2.3 Who Decides Eligibility — A Critical Distinction

Many sales reps get confused about who actually approves a consumer for Lifeline. ConnectTo does NOT approve anyone. ConnectTo collects the consumer's information and documentation and submits it to the appropriate administrator. Approval comes from outside ConnectTo:

Decision	Federal Lifeline	California LifeLine
Eligibility approval	USAC — National Verifier	California LifeLine Third-Party Administrator (TPA)
Enrollment system of record	USAC — NLAD	California LifeLine TPA enrollment platform
Representative registration	USAC — RAD (Rep ID required)	Per CPUC rules; ConnectTo internal credentialing
Annual recertification	USAC (database checks then NV outreach)	California LifeLine TPA (renewal form / PIN)
Rule-making	FCC	CPUC
Audits & enforcement	USAC, FCC, FCC OIG, USAC OIG	CPUC Consumer Protection & Enforcement Division, CA Attorney General

2.4 The California LifeLine Third-Party Administrator (TPA)

The California LifeLine TPA is the contractor selected by the CPUC to operate the California LifeLine program on a day-to-day basis. The TPA is the body that actually receives the consumer's California LifeLine application, reviews documentation, makes the eligibility decision, sends approval or denial notices to the consumer, manages annual renewal, and operates the consumer-facing call center, IVR, and online portal. CPUC sets the rules; the TPA executes them.

Key facts about the California TPA that every ConnectTo Lifeline rep must know:

- The TPA — not ConnectTo, and not the CPUC directly — issues the consumer's California LifeLine PIN and eligibility decision.
- ConnectTo cannot "override" or "speed up" a TPA decision. We do not sit between the consumer and the TPA — we submit, and we wait.
- The TPA communicates with the consumer directly by mail, phone, IVR, and the online portal at californialifeline.com. ConnectTo representatives may not complete, sign, or submit the consumer's California LifeLine application on the consumer's behalf.
- If the TPA contacts the consumer for additional documentation, the consumer must respond before the deadline or the application will be denied.
- If the TPA denies the consumer, the consumer has appeal rights described in the denial notice; ConnectTo reps must direct consumers to those rights and to californialifeline.com or the TPA's listed phone number, NOT discourage appeals.
- The identity and corporate name of the California LifeLine TPA is set by competitive procurement and may change over time. Always check the current Administrator information at californialifeline.com before quoting a TPA name to a consumer.

CONNECTTO DOES NOT MAKE ELIGIBILITY DECISIONS

USAC decides federal eligibility. The California TPA decides California eligibility. ConnectTo's role is to (1) collect truthful information and documentation from the consumer, (2) submit it through the proper channel (using Owlup — see Section 6), and (3) provide service when and only when the appropriate administrator approves the consumer.

Never tell a consumer 'I can approve you.' Never tell a consumer 'I'll get this through for you.' These statements are false and create compliance risk.

2.5 How the Two Programs Interact

A single California household may receive: (1) one federal Lifeline discount, and (2) one California LifeLine discount, but only one of each, and only on a single line per household. The discounts may be combined on the same line because ConnectTo participates in both programs.

THE ONE-PER-HOUSEHOLD RULE

Under both federal and California rules, a 'household' is limited to ONE Lifeline benefit. A household is everyone living at the same address who shares income and expenses. Roommates who do not share income/expenses can each have their own benefit, but each must complete a Household Worksheet (FCC Form 5631 or California equivalent).

You must explain this to every applicant. Enrolling a second household member when the household already has Lifeline is a violation.

3. Subscriber Eligibility — Who Qualifies

A consumer qualifies for Lifeline through either (a) program-based eligibility, or (b) income-based eligibility. The applicant must prove eligibility with current, valid documentation. ConnectTo may not enroll any applicant who has not been verified by the National Verifier (federal) and the California LifeLine TPA (California).

3.1 Federal Program-Based Eligibility (47 C.F.R. § 54.409)

The applicant participates in at least one of the following federal programs:

- Supplemental Nutrition Assistance Program (SNAP / food stamps / CalFresh in California).
- Medicaid (Medi-Cal in California).
- Supplemental Security Income (SSI).
- Federal Public Housing Assistance (FPHA / Section 8).
- Veterans Pension or Survivors Pension benefit.
- Tribal-specific programs: Bureau of Indian Affairs General Assistance, Tribal TANF, Food Distribution Program on Indian Reservations (FDPIR), or Head Start (income-based standard) — for Tribal lands residents.

3.2 Federal Income-Based Eligibility

Household income at or below 135% of the Federal Poverty Guidelines (FPG). The FPG is updated annually by HHS. Always check the current USAC chart in Owlup before quoting a figure to a customer.

3.3 California LifeLine Eligibility (Additional & Different Programs)

California LifeLine accepts the federal program-based pathways above PLUS additional California-specific qualifying programs. Current California-recognized programs include:

- CalFresh / SNAP.
- Medi-Cal (Medicaid).
- Supplemental Security Income (SSI / SSP).
- Federal Public Housing Assistance / Section 8.
- CalWORKs / Tribal TANF / Stanislaus County Work Opportunity & Responsibility to Kids.
- Low Income Home Energy Assistance Program (LIHEAP / HEAP).
- Women, Infants and Children (WIC).
- National School Lunch Program's Free Lunch Program (NSL).
- Bureau of Indian Affairs General Assistance.

- Head Start Income Eligible (Tribal Only).
- Federal Veterans and Survivors Pension Benefit.
- Income-based: California household income at or below the published California LifeLine income limits (which differ from federal FPG and are based on household size).

3.4 Acceptable Eligibility Documentation

Eligibility documents must (i) be current — generally dated within the previous 12 months — (ii) clearly show the applicant's name (or that of a household member when applicable), (iii) clearly identify the qualifying program or income amount, and (iv) be from an official issuing source. Owlup's document upload module enforces these criteria, but you must visually verify the document before submission.

Type	Acceptable Documents
Program-based	<ul style="list-style-type: none"> • Current benefit award/approval letter from the issuing agency • Statement of benefits or current benefit verification letter • Notice/letter of participation in the qualifying program • Document/screenshot from the program portal confirming current participation • EBT card alone is NOT sufficient — must be paired with award/approval documentation
Income-based	<ul style="list-style-type: none"> • Prior year's federal or state tax return • Three (3) consecutive months of current income statements (paystubs) • Current income statement from employer, Social Security statement • Veterans Administration statement of benefits • Retirement / pension statement of benefits • Unemployment / Workers' Compensation statement of benefits • Federal or Tribal notice letter of participation in General Assistance • Divorce decree, child-support award, or other official document containing income information
Identity	<ul style="list-style-type: none"> • Valid government-issued photo ID (driver's license, state ID, passport, military ID, Tribal ID) • Last four digits of SSN (or Tribal Identification Number on Tribal lands) — required for NV
Address	<ul style="list-style-type: none"> • Driver's license or state ID showing current address • Utility bill, lease, or mortgage statement • Most recent W-2 or tax return • If non-permanent address: applicant must complete the Lifeline Temporary Address Worksheet and re-verify every 90 days

Type

Acceptable Documents

DOCUMENTATION RULES YOU MUST FOLLOW

1. NEVER alter, edit, redact, or 'clean up' a customer's eligibility document. Submit it exactly as the customer provided it through Owlup.
2. NEVER fill out documentation on behalf of the customer. The customer must sign and date their own application and certifications.
3. NEVER pre-fill, copy/paste, or reuse another applicant's documents.
4. Documents must be retained securely for at least ten (10) years for federal Lifeline (per 47 C.F.R. § 54.417) and per California retention requirements.
5. If the customer cannot produce required documentation, you must NOT enroll them. There is no exception.

4. One-Per-Household Rule and the Household Worksheet

The most heavily audited and most commonly violated Lifeline rule is the one-per-household limit. Read this section carefully and explain it correctly to every customer. Failure to apply this rule properly is the single largest cause of subscriber-level USAC findings and clawbacks.

4.1 Definition of 'Household' (47 C.F.R. § 54.400(h))

A 'household' is any individual or group of individuals who are living together at the same address and share income and household expenses. The definition is functional, not legal. It does not depend on family relationship, marriage, or whose name is on the lease.

4.2 Independent Economic Households at the Same Address

Two or more people may live at the same physical address but qualify as separate 'households' if they do not share income and household expenses. Common examples include:

- Roommates who split rent but each pay their own food, utilities, and personal expenses separately.
- An adult child living with parents but maintaining separate finances.
- Residents of group homes, transitional housing, nursing homes, assisted living facilities, homeless shelters, and similar facilities.
- Multi-family dwellings where unrelated families share an address.

4.3 Household Worksheet — When Required

Whenever the National Verifier or NLAD detects another Lifeline subscriber at the same address, the applicant must complete and sign the One-Per-Household Worksheet. Owlup will surface the worksheet at this point in the workflow. The applicant certifies, under penalty of perjury, that they are an independent economic household and do not share income/expenses with the other Lifeline subscriber at the address.

As a ConnectTo enrollment representative, you must:

4. Explain the household rule clearly using the script in Section 13.
5. Provide the worksheet to the customer through Owlup and let them read and complete it themselves.
6. NEVER tell the customer what to write or how to answer.
7. NEVER suggest that an ineligible applicant 'check the independent household box' to get around the rule. This is fraud.
8. Keep the signed worksheet in the customer file (Owlup) for ten (10) years.

RED FLAG SCENARIOS — STOP AND ESCALATE

- Three or more applicants from the same address in a short period.
- An applicant tells you another household member is 'already getting it' and asks to add another line.
- A new applicant is unsure whether anyone else at the address has Lifeline.
- An applicant asks you to 'help them word' the household worksheet.

When any of these occur, stop the enrollment, document the conversation in Owlup, and escalate to your ConnectTo Compliance Officer.

5. Sales Compensation Rule — No Per-Enrollment Commissions

ZERO-COMMISSION POLICY FOR LIFELINE ENROLLMENTS

ConnectTo Communications, Inc. does NOT pay sales commissions, bonuses, spiffs, contests, or any per-enrollment compensation tied to the number of Lifeline enrollments completed.

If you are a ConnectTo employee, contractor, or agent involved in the sale, marketing, or enrollment of Lifeline service, your compensation is structured as fixed wage or salary. You may not solicit, accept, or expect any payment that varies with the number of Lifeline applications you submit, the number of consumers you enroll, or the number of consumers you qualify.

5.1 Why This Rule Exists

Federal regulators determined years ago that paying enrollment representatives a per-enrollment commission creates an irresistible incentive to commit fraud — to enroll people who are not eligible, to push consumers through certifications they don't understand, to forge documents, to skirt the one-per-household rule, and to create 'phone farms.' Following enforcement actions against carriers whose commissioned agents enrolled large numbers of ineligible subscribers, the FCC and CPUC adopted strict limits on how Lifeline enrollment representatives may be compensated.

5.2 What the Rules Say

- FCC 2016 Lifeline Modernization Order (FCC 16-38) and 47 C.F.R. § 54.406 require that ETCs verify the identity of, register, and supervise their enrollment representatives, and prohibit compensation structures that create incentives to enroll ineligible subscribers.
- USAC's Compliance Plans and ETC commitments commonly require ETCs to certify that enrollment representatives are not compensated based on the number of consumers enrolled in Lifeline.
- California PUC General Order 153 and related decisions impose the same constraint and authorize CPUC enforcement against carriers whose agent compensation creates fraud incentives. Per-enrollment compensation has been explicitly identified by CPUC as a fraud risk and is prohibited under California LifeLine carrier obligations.
- State law: California Public Utilities Code §§ 2107–2114 authorize penalties of up to \$50,000 per violation, per day for carriers whose practices, including improper agent compensation, cause Lifeline fraud.

5.3 ConnectTo's Commission-Free Compensation Policy

To eliminate any incentive — and any appearance of an incentive — to enroll ineligible consumers, ConnectTo's policy is broader and stricter than the federal floor:

9. ConnectTo Lifeline-facing employees, including sales representatives, enrollment specialists, retail associates, field reps, customer-service agents who process recertifications or transfers, and supervisors of the foregoing, are paid a fixed hourly wage or fixed salary.
10. ConnectTo will NOT pay any commission, bonus, spiff, prize, contest entry, gift card, gift, leaderboard reward, or any other variable compensation that is tied (directly or indirectly) to the number of Lifeline applications submitted, consumers approved, consumers enrolled, lines activated, recertifications completed, or transfers processed.
11. ConnectTo will not measure, post, distribute, or celebrate "top enroller" rankings, daily/weekly/monthly enrollment quotas, or per-rep enrollment counts in a way that effectively functions as a commission proxy.
12. Sub-agents, master agents, dealer programs, and any third-party vendors used by ConnectTo for Lifeline enrollment are contractually required to follow the same no-commission rule. ConnectTo verifies vendor compensation structures during onboarding and during quarterly compliance audits.
13. Performance reviews for Lifeline-facing employees focus on COMPLIANCE QUALITY (script accuracy, document integrity, QA score, customer satisfaction, error/escalation rate) — not enrollment volume.

5.4 What Is Permitted

- Fixed hourly wage or fixed salary.
- General company-wide bonuses not tied to Lifeline enrollment metrics (e.g., a holiday bonus available to all employees regardless of role).
- Compensation tied to QA / compliance scores (e.g., a small quality bonus for representatives whose QA reviews show 95%+ compliance accuracy over a quarter), as long as the metric rewards compliance behavior, not enrollment volume.
- Recognition that does not have monetary or material value (e.g., a thank-you note from the Compliance Officer for catching a fraud attempt).

5.5 What Is Prohibited (Examples)

- "\$5 for every approved Lifeline application."
- "Hit 50 enrollments this month and earn a \$200 bonus."
- "Top enroller of the week wins a gift card."
- "Activation bonus" of any kind tied to Lifeline.
- Sub-agent contracts that pay per-enrollment fees.

- Daily/weekly enrollment quotas with bonus pay above the quota.
- Any sales contest in which Lifeline enrollment counts toward a prize.

5.6 Your Acknowledgment

Every ConnectTo Lifeline-facing employee must acknowledge, as part of this manual's signed acknowledgment (Section 16), that they understand and accept this no-commission policy. If at any time you are offered, promised, or paid anything that appears to violate this policy — by ConnectTo or by any third party — you must report it immediately to the ConnectTo Compliance Officer or to the USAC OIG hotline (1-888-203-8100). Whistleblower protections apply.

CRITICAL POINT FOR ALL SALES STAFF

If you joined ConnectTo expecting Lifeline 'commissions,' adjust your expectations now. Lifeline is NOT a commission product. Your job is to provide accurate information, collect honest documentation, and help eligible consumers access a benefit they qualify for. Volume targets and bonus chases are exactly what get carriers fined and enrollers fired and prosecuted. ConnectTo will not put you in that position, and you must not put ConnectTo in that position either.

6. Owlup — ConnectTo's Lifeline Enrollment & Management Software

ConnectTo uses Owlup as its primary software platform for qualifying potential Lifeline customers, submitting applications to USAC and the California TPA, activating phones, and managing the customer lifecycle. Every ConnectTo Lifeline-facing employee will be issued an Owlup user account. You may not perform Lifeline work for ConnectTo on any other platform, in any spreadsheet, or on paper.

6.1 What Owlup Does

- Pre-qualification screening: collects the consumer's information (name, address, last 4 SSN/Tribal ID, qualifying program, income) and provides initial eligibility indications based on USAC and California TPA rules.
- Document capture: secure upload of identity documents and proof of eligibility, with consumer-controlled signatures.
- National Verifier integration: submits the consumer's federal Lifeline application to USAC's National Verifier for the federal eligibility decision.
- California TPA integration: submits the consumer's California LifeLine application to the California Third-Party Administrator for the California eligibility decision.
- NLAD enrollment: once the consumer is approved, enrolls the subscriber in NLAD using your registered RAD Rep ID.
- Phone / SIM activation: provisions the device, ports the number if applicable, and activates service.
- Customer lifecycle management: tracks usage, non-usage cure timers, recertification windows, transfers, address changes, and de-enrollments — and surfaces them to the appropriate ConnectTo team.
- Audit trail: every action you take in Owlup is time-stamped and logged against your user ID and your RAD Rep ID. This log is admissible evidence in USAC, FCC, and CPUC audits.

6.2 Your Owlup Responsibilities

14. Use only your own Owlup credentials. Never share your username, password, MFA token, or your RAD Rep ID with anyone — not coworkers, not supervisors, not 'just this one time.'
15. Lock your screen any time you leave your workstation. Owlup contains live PII.
16. Never download, screenshot, photograph, email, text, or otherwise copy customer information out of Owlup. All customer data must remain in Owlup.

17. Use only company-issued, encrypted devices to access Owlup. Personal phones, personal laptops, and personal email accounts are prohibited.
18. Complete the Owlup-specific training module (in addition to this handbook) before performing live enrollments.
19. Report any suspected Owlup malfunction, suspected data breach, or unusual activity to the Compliance Officer within one (1) hour.

6.3 The Owlup-Driven Enrollment Flow

20. Greet the consumer using the approved ConnectTo script and confirm the consumer wants to apply for Lifeline.
21. In Owlup, open a new application and capture the consumer's identity (name, DOB, last 4 SSN/Tribal ID, address, ID type).
22. Read the required disclosures (Section 7) verbatim. Owlup will display the script — read what is on the screen.
23. Capture the consumer's qualifying program or income documentation through Owlup's secure upload.
24. Have the consumer complete and sign the certifications themselves. Do not click through these for them.
25. Submit to the National Verifier (federal) and to the California TPA (state) through Owlup.
26. If approved by USAC: Owlup will guide NLAD enrollment using your RAD Rep ID.
27. If approved by the California TPA: Owlup will record the approval and the California LifeLine PIN status.
28. Activate the device through Owlup's activation module.
29. Provide the consumer with the Welcome Pack (rights, responsibilities, plan terms, ConnectTo customer-service contact).

OWLUP DOES NOT REPLACE YOUR JUDGMENT

Owlup is a tool that enforces compliance guardrails — it will not let you bypass the National Verifier or skip required disclosures. But Owlup cannot read the customer's mind or detect every fraud attempt. If something feels wrong about an enrollment — the customer is being coached by someone off-camera, multiple applicants are using the same documents, the customer cannot answer basic questions about their own qualifying program — STOP, document in the Owlup notes, and escalate. Owlup logs your judgment as well as your clicks.

7. National Verifier, NLAD, and the RAD Rep ID

Section 6 covered how ConnectTo uses Owlup to interface with these federal systems. This section explains the federal systems themselves, because you need to understand what is happening behind Owlup.

7.1 National Verifier (NV)

USAC's National Verifier is the centralized federal eligibility system. Every federal Lifeline applicant must be approved through NV before they can be enrolled in NLAD. NV checks the applicant's identity, residency, and qualification through automated database checks (and through manual document review when automated checks fail). NV — not ConnectTo, not even USAC staff at the carrier level — is the system of record for federal eligibility decisions.

7.2 NLAD

USAC's National Lifeline Accountability Database is the federal enrollment system of record. Once NV approves a consumer, ConnectTo enrolls them in NLAD using the rep's RAD Rep ID. NLAD also handles duplicate detection, transfers between carriers, and de-enrollments.

7.3 RAD Rep ID

Every ConnectTo employee or agent who interacts with NV or NLAD on behalf of an applicant — sales agents, enrollment specialists, customer-service representatives who process recertifications, and supervisors who approve enrollments — must be registered in the Representative Accountability Database (RAD). RAD registration requires:

- Government-issued photo ID.
- Last four of SSN.
- Date of birth.
- A unique email address (no sharing of email accounts).
- Background check / agreement to USAC's terms of use.

You must use only your own Rep ID for every transaction. Sharing, lending, borrowing, or fabricating Rep IDs is a federal violation and grounds for immediate termination from ConnectTo and prosecution.

REP ID = YOUR FINGERPRINT

Every NV and NLAD action is permanently logged against the Rep ID used to perform it. If your Rep ID enrolls a fraudulent subscriber, USAC will hold YOU personally accountable, even if someone else used your credentials.

Treat your Rep ID and login credentials like your bank PIN. Never write them down where someone else can see them. Never share. Always log out of Owlup at the end of every shift.

8. Required Certifications and Disclosures to the Consumer

Federal and California rules require that, at the time of enrollment and at every recertification, the consumer make a series of certifications under penalty of perjury, and that ConnectTo (through you, the representative) make a series of disclosures to the consumer. Owlup displays the required disclosures and certifications on screen. Read them as written. You may not skip, paraphrase, or summarize these requirements.

8.1 Consumer Certifications (Federal — 47 C.F.R. § 54.410)

- The consumer meets the income or program-based eligibility criteria.
- The consumer's household will receive only ONE Lifeline-supported service.
- The information the consumer provides is true and correct to the best of their knowledge.
- The consumer understands that providing false or fraudulent information to receive Lifeline benefits is punishable by law, including fines, imprisonment, de-enrollment, or being barred from the program.
- The consumer authorizes USAC and ConnectTo to access any records required to verify the consumer's statements and to confirm eligibility.
- The consumer acknowledges that Lifeline is a federal benefit and that willfully making a false statement to obtain the benefit is punishable under 18 U.S.C. §§ 287, 371, 1001, 1341, 1343.
- The consumer acknowledges that Lifeline service is non-transferable to any other person.
- The consumer acknowledges they must use the service at least once every 30 days for prepaid wireless plans, or be subject to de-enrollment.
- The consumer agrees to inform ConnectTo within 30 days if they no longer qualify, move, or another household member begins receiving Lifeline.
- The consumer must annually recertify (or comply with NV automated recertification).

8.2 California-Specific Certifications & Disclosures

- The consumer must reside in California.
- The consumer must affirm they are not receiving California LifeLine service from another carrier.
- Consumers must receive the California LifeLine 'Important Information' notice and the rules in their preferred language (California requires materials in English, Spanish, Chinese, Korean, Tagalog, Vietnamese, and Russian; check the current Administrator-published list).

- Carriers must explain that the consumer may be subject to renewal every year and that failure to renew results in removal from the program.
- Carriers must explain the right to file a complaint with the CPUC's Consumer Affairs Branch.

9. Marketing, Advertising, and Sales Conduct Rules

Lifeline marketing is heavily regulated. The rules below apply to every advertisement, flyer, table tent, social-media post, door-to-door pitch, retail kiosk display, telephone solicitation, text-message campaign, and digital ad that mentions or implies Lifeline service. They apply to ConnectTo W-2 employees, independent contractors, and master/sub-agents alike. ConnectTo is liable for the conduct of its agents.

9.1 Mandatory Disclosures in All Lifeline Marketing

- Lifeline is a government benefit program.
- Only eligible consumers may enroll in the program.
- The program is limited to one discount per household.
- Lifeline service is non-transferable.
- Documentation of eligibility is required.
- ConnectTo's legal name ("ConnectTo Communications, Inc.") must appear on all materials. The DBA "ConnectTo" may be used in addition to, but not in substitution for, the legal name on the disclosure block.
- In California, the California LifeLine logo and required CPUC disclosures must appear on all materials referencing California LifeLine.

9.2 Prohibited Marketing & Sales Practices

- Stating or implying that Lifeline service is 'free' without explaining that it is a government-supported discount program (you may say 'no cost to qualified consumers' but must contextually disclose program-based nature).
- Offering, promising, or providing any inducement, gift, cash, gift card, prize, sweepstakes entry, or any other thing of value in exchange for enrollment, application, or recertification (this prohibition is strict — even a \$5 gift card is a violation).
- Co-marketing Lifeline with the sale of any other product (e.g., 'sign up for Lifeline and get this phone case for free').
- Pressuring, rushing, or coaching a consumer through eligibility certifications.
- Speaking on a consumer's behalf during the National Verifier or California LifeLine TPA interaction.
- Making false, misleading, or unverifiable claims about coverage, speed, plan features, or eligibility.
- Targeting prohibited locations such as inside a Social Security office, a welfare office, or any government-benefits office unless expressly invited.
- Door-to-door solicitation in violation of state, county, or HOA rules.

- 'Phone farms,' bulk submissions, or any pattern of enrollments tied to a single phone, IP address, agent, or location designed to inflate enrollment numbers.
- Submitting an enrollment without first speaking with the actual subscriber.
- Sharing, copying, photographing, or transmitting a consumer's documentation outside Owlup.
- Offering or paying any per-enrollment commission or sales bonus to anyone (see Section 5).

9.3 Required Statements on Print and Digital Ads

Every ConnectTo Lifeline ad must contain language substantially similar to the following:

CONNECTTO MODEL DISCLOSURE

"Lifeline is a federal benefit program. Lifeline service is non-transferable. Only one discount per household is permitted. Consumers who willfully make false statements to obtain the Lifeline benefit can be punished by fine or imprisonment, and may be barred from the program. Service provided by ConnectTo Communications, Inc. (DBA: ConnectTo), 555 Riverdale Dr., Suite A, Glendale, CA 91204. Phone 1-888-570-6783. www.ConnectTo.com."

California ads must add: "California LifeLine is a state benefit program administered by the California Public Utilities Commission. To qualify, you must meet program eligibility requirements. For information visit californialifeline.com or call 1-877-858-7463."

9.4 Door-to-Door, Tabling, and Field Sales Specifics

- All field representatives must wear ConnectTo-issued ID badges showing the legal carrier name ("ConnectTo Communications, Inc."), the representative's name and Rep ID, and a clear photo.
- All scripts must be the ConnectTo-approved Lifeline script delivered through Owlup. No deviation.
- All paper applications and signed certifications must be turned in to ConnectTo at end of day. Never store consumer documents in personal vehicles, personal devices, or personal email.
- All field activity must be logged in Owlup with location, time, and result. Geo-tagged enrollment is required.

10. Recertification, Non-Usage, Transfers, and De-Enrollment

10.1 Annual Recertification (47 C.F.R. § 54.410(f))

Every Lifeline subscriber must recertify their eligibility once every 12 months. USAC performs federal recertification through automated database checks first; if that fails, the consumer is contacted directly by USAC. ConnectTo may NOT contact consumers about federal recertification independently of the NV process — however, ConnectTo must support and remind subscribers, and Owlup will surface upcoming recertification windows.

California LifeLine has its own annual renewal process administered by the California TPA. Subscribers receive a renewal form and PIN from the TPA and must complete renewal by the deadline. Failure to renew results in de-enrollment.

10.2 Non-Usage Rule (47 C.F.R. § 54.407(c)(2))

Subscribers who receive a free Lifeline service must use the service at least once during any 30-day period. Qualifying usage includes:

- Completing an outbound call.
- Purchasing minutes from ConnectTo.
- Answering an incoming call from someone other than ConnectTo or its representative.
- Responding to a direct contact from ConnectTo confirming the subscriber wishes to keep the service.
- Sending a text message.
- Using data.

If a subscriber has no qualifying activity for 30 consecutive days, ConnectTo must enter a 15-day cure period. If the subscriber does not use the service during the cure period, ConnectTo must de-enroll the subscriber within 5 business days and notify NLAD. Owlup automates this timer.

10.3 Transfers (Benefit Transfer Process — BTP)

A subscriber may transfer their Lifeline benefit to a different carrier. The new carrier must use the National Verifier benefit transfer process. The consumer must provide consent to the transfer, and the consent must be documented in Owlup. The previous carrier is automatically removed from NLAD upon transfer.

- Never transfer a benefit without explicit, documented consumer consent.
- Never represent to a consumer that a transfer 'has to' happen, or that they 'must' switch.

- Always disclose: 'You are transferring your single Lifeline benefit from [previous carrier] to ConnectTo. You will lose your service with [previous carrier]. Do you consent to this transfer?'

10.4 De-Enrollment Triggers

- Consumer fails recertification (annual or NV automated).
- Consumer is found ineligible (NV, NLAD, TPA, or audit).
- 30-day non-usage on a free service, after the 15-day cure period.
- Duplicate enrollment detected.
- Consumer requests de-enrollment.
- ConnectTo discovers the consumer no longer qualifies.
- Death of the subscriber (ConnectTo learns through any reliable means).

11. Privacy, Data Security, and CPNI

Lifeline records contain Personally Identifiable Information (PII) including names, addresses, dates of birth, the last four digits of Social Security numbers, identity document images, and proof of program participation. Some of this information is also Customer Proprietary Network Information (CPNI) under 47 U.S.C. § 222 and 47 C.F.R. § 64.2001 et seq. Mishandling this information is both a federal and state violation, including under the California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA).

11.1 Mandatory Privacy Practices

- Access PII only when needed for a legitimate, assigned business purpose, and only through Owlup.
- Never email, text, photograph, screenshot, or upload customer documents to personal devices, personal accounts, or unapproved cloud services.
- Use only ConnectTo-issued, encrypted devices and Owlup.
- Lock your screen any time you leave your workstation.
- Never discuss specific customer information in public, on social media, or with unauthorized coworkers.
- Shred (or place in approved secure shred bins) any printed customer information immediately after use.
- Report any actual or suspected breach within 1 hour to the ConnectTo Compliance Officer.

11.2 Records Retention

- Federal Lifeline subscriber records: minimum ten (10) years (47 C.F.R. § 54.417(a)).
- California LifeLine subscriber records: per CPUC General Order 153 retention requirements.
- Marketing materials, scripts, training records, and QA records: minimum ten (10) years.
- Records may not be destroyed before the retention period expires under any circumstances, including company shutdown or program exit.

12. Audits, Enforcement, and Penalties

USAC conducts both routine and targeted audits, including (i) Beneficiary and Contributor Audit Program (BCAP) audits, (ii) subscriber-level reviews (NLAD scrubs), (iii) the FCC's Office of Inspector General (OIG) reviews, and (iv) joint reviews with state regulators. The CPUC and the California Attorney General may also conduct investigations and audits in California.

12.1 Civil and Criminal Penalties

Statute / Rule	Penalty
47 U.S.C. § 503 / FCC	Forfeitures up to \$237,268 per violation, with continuing violations up to \$2,372,677 (amounts adjusted annually for inflation).
31 U.S.C. § 3729 (False Claims Act)	Civil penalties of \$13,946–\$27,894 per false claim, plus treble damages.
18 U.S.C. § 1001	Up to 5 years imprisonment for false statements to the federal government.
18 U.S.C. §§ 1341 / 1343	Mail and wire fraud — up to 20 years imprisonment per count.
18 U.S.C. § 287	False claims against the United States — up to 5 years imprisonment per count.
CA Pub. Util. Code §§ 2107–2114	CPUC penalties up to \$50,000 per violation, per day; restitution; and revocation of California LifeLine eligibility.

12.2 Employee Consequences

- Immediate termination from ConnectTo for any willful violation of Lifeline rules.
- Personal liability for restitution of fraudulent subsidies received via the employee's Rep ID.
- Personal civil and criminal exposure under the statutes above.
- Permanent debarment from RAD and from Lifeline participation.
- Reporting to CPUC, FCC, USAC OIG, and applicable law enforcement.

13. Customer Questions & Approved Answers (Q&A Script)

Use these approved answers when speaking to potential or existing ConnectTo customers. Do not improvise. If a customer asks a question not covered here, say: "That's a great question. Let me check with my supervisor at ConnectTo and I'll get back to you with the correct answer." Then escalate.

Q1. What is Lifeline?

"Lifeline is a federal government benefit program that lowers the monthly cost of phone or internet service for households that qualify based on income or participation in certain government assistance programs. In California, there is also a separate state program called California LifeLine that provides an additional discount. The federal program is administered by USAC for the FCC. The California program is administered by a third-party administrator under the California Public Utilities Commission. ConnectTo participates in both programs."

Q2. Is Lifeline free?

"Lifeline is a discount program. Depending on the plan you choose with ConnectTo, your monthly cost after the discount may be zero, or there may still be a small monthly amount. The discount itself comes from the federal and state Lifeline funds. I'll explain the exact cost of each plan I can offer you before you decide."

Q3. How do I qualify?

"You qualify if you participate in certain programs — like SNAP/CalFresh, Medi-Cal, SSI, federal public housing, or veterans pension benefits — or if your household income is at or below 135% of the federal poverty guidelines. California LifeLine accepts additional programs like CalWORKs, LIHEAP, WIC, and the National School Lunch Program. I can give you the full list, and we'll need a current document showing you are in one of those programs or current proof of income."

Q4. Who actually approves my application?

"ConnectTo doesn't approve you — we collect your information and send it to the right place. Federal Lifeline approval comes from USAC's National Verifier. California LifeLine approval comes from the California LifeLine Third-Party Administrator working under the California PUC. They make the decision. We submit your application accurately and follow up with you when we hear back."

Q5. Can my whole family sign up?

"Lifeline is limited to one discount per household. A household is everyone living at the same address who shares income and household expenses. So a family that lives together and shares finances gets one Lifeline benefit. If unrelated adults live at the same address but keep

their finances separate — like roommates — each may qualify, but each must complete a Household Worksheet certifying they are an independent household."

Q6. Someone in my house already has Lifeline, can I get one too?

"Possibly, but only if you are a separate economic household — meaning you don't share income or expenses with the person who already has Lifeline. If you do share income and expenses, only one Lifeline benefit is allowed in your household. I cannot tell you what answers to give on the Household Worksheet — you must answer it truthfully yourself. Providing false information is a federal crime."

Q7. What documents do I need?

"You'll need a valid government-issued photo ID, the last four digits of your Social Security number, and proof of eligibility — either a current document showing you participate in a qualifying program, or proof of income. The document needs to clearly show your name and the program you're in or your income. I can give you the full acceptable-documents list."

Q8. Can you fill out the application for me?

"I can walk you through the questions and explain what each one means, but you must read and answer the eligibility questions yourself, and you must sign the application yourself. Federal and California rules don't allow me to answer the eligibility certifications for you."

Q9. What happens if my information is wrong?

"Lifeline applications are submitted under penalty of perjury. Providing false information to receive Lifeline benefits is a federal crime that can result in fines, imprisonment, and being permanently barred from the program. If something on your application is incorrect, please tell me now so we can correct it before you sign."

Q10. Will I keep this benefit forever?

"You keep it as long as you remain eligible. You'll need to recertify every year — that's a federal requirement. In most cases, USAC's National Verifier rechecks your eligibility automatically through government databases. If they can't, USAC or the California TPA will contact you and you'll need to respond and prove you still qualify. If you no longer qualify, or if you move, or if someone else in your household starts receiving Lifeline, you must let ConnectTo know within 30 days."

Q11. What if I move?

"You must update your address with ConnectTo within 30 days. If you move out of California, your California LifeLine benefit will end, but you may be able to keep federal Lifeline through a carrier in your new state."

Q12. What if I don't use my phone for a while?

"For free Lifeline service, federal rules require you to use the service at least once every 30 days — that means a call, a text, using data, buying minutes, or responding to a usage check

from us. If 30 days pass without any activity, ConnectTo has to put your line on a 15-day cure notice. If you still don't use it, we have to remove you from the program. You can always reapply, but you'd have to start over."

Q13. Can I switch this Lifeline benefit to another carrier?

"Yes. You can transfer your single Lifeline benefit to another participating carrier at any time. The new carrier will start the transfer through the National Verifier. You will lose service with ConnectTo when the transfer goes through, and you can only have Lifeline with one carrier at a time."

Q14. Are you a government agency?

"No. ConnectTo Communications, Inc. is a private telecommunications company headquartered at 555 Riverdale Dr., Suite A, Glendale, CA 91204, that participates in the Lifeline program as an Eligible Telecommunications Carrier. The program itself is funded by the federal government and, in California, by the state. I am a representative of ConnectTo. You can verify ConnectTo at www.ConnectTo.com or by calling 1-888-570-6783."

Q15. Will you sell or share my information?

"ConnectTo collects your information only for the Lifeline program and to provide your service. We protect it under federal CPNI rules and California privacy law (CCPA/CPRA). We do not sell your Lifeline information. You can request a copy of our privacy policy at any time at www.ConnectTo.com."

Q16. What if I want to file a complaint?

"You can contact me or my ConnectTo supervisor first. You can also file a complaint with the California Public Utilities Commission Consumer Affairs Branch at 1-800-649-7570, or with the FCC at 1-888-CALL-FCC, or with USAC at 1-800-234-9473."

Q17. Can I get a free phone or gift if I sign up?

"Lifeline rules prohibit ConnectTo from giving you cash, gift cards, prizes, or other items in exchange for enrolling. Some plans include a basic device as part of the service plan itself, and I'll explain the device options if any are included with the plan you choose. But there are no incentives or rewards for enrolling — that's a federal rule."

Q18. Do you get paid more if you sign me up?

"No. ConnectTo does not pay sales commissions or per-enrollment bonuses for Lifeline. I'm paid the same whether you enroll or not. That's how the program is supposed to work — it removes any incentive for me to push you into something you don't qualify for. My job is to give you accurate information so you can decide."

Q19. I'm not sure if I'm eligible — can you sign me up just to see?

"No. ConnectTo can only submit your application if we have your truthful information and required documentation. The National Verifier and the California TPA will then determine

eligibility. If you're not sure whether your documents qualify, I can review them with you, or you can check at lifelinesupport.org or californialifeline.com."

Q20. Where can I learn more about ConnectTo?

"You can visit our website at www.ConnectTo.com. Our Lifeline information is at www.ConnectTo.com/lifeline. You can reach our 24/7 sales and support team at 1-888-570-6783, or email support@connectto.com. Our office is at 555 Riverdale Dr., Suite A, Glendale, CA 91204."

14. Glossary of Lifeline Terms

Term	Definition
BTP	Benefit Transfer Process — the National Verifier process for moving a subscriber's Lifeline benefit between carriers.
BCAP	Beneficiary and Contributor Audit Program — USAC's audit framework.
CPNI	Customer Proprietary Network Information — telecom customer data protected under 47 U.S.C. § 222.
CPUC	California Public Utilities Commission — regulator that adopts California LifeLine rules.
ETC	Eligible Telecommunications Carrier — a carrier designated by the FCC or state PUC to participate in Lifeline. ConnectTo Communications, Inc. is a designated ETC in California.
FCC	Federal Communications Commission — issues federal Lifeline rules.
FPG	Federal Poverty Guidelines — issued annually by HHS; basis for income eligibility.
GO 153	California PUC General Order 153 — California LifeLine rulebook.
NLAD	National Lifeline Accountability Database — USAC's enrollment and de-enrollment system.
NV	National Verifier — USAC's centralized eligibility verification system.
OPH	One-Per-Household rule.
Owlup	ConnectTo's primary enrollment, activation, and customer-management software platform. All ConnectTo Lifeline work is performed in Owlup.
PII	Personally Identifiable Information.
RAD	Representative Accountability Database — USAC database of registered enrollment representatives.
Rep ID	The unique RAD identifier assigned to each enrollment representative.
TPA	Third-Party Administrator — the contractor selected by the CPUC to administer the California LifeLine program day-to-day; receives applications, makes eligibility decisions, manages renewals, and operates the consumer call center.
TPV	Third-Party Verification — independent verification of consumer authorization (where required).
USAC	Universal Service Administrative Company — administers federal Lifeline.

15. Knowledge Assessment (Required QA)

You must complete this assessment after reading this manual. A passing score of 90% (28 of 31 correct) is required. Your supervisor or the ConnectTo Compliance Officer will grade and review this assessment with you. The signed assessment is retained in your training file for ten (10) years.

Employee Name: _____ Date: _____

Section A — Multiple Choice (circle the best answer)

1. The maximum federal Lifeline discount for a non-Tribal subscriber per month is:

- a) \$5.25 b) \$9.25 c) \$25.00 d) \$34.25

2. The 'one-per-household' rule means:

- a) Only one person per home address may ever apply for Lifeline.
b) Only one Lifeline benefit per economic household sharing income and expenses.
c) Only one Lifeline benefit per family.
d) Only one Lifeline benefit per ZIP code.

3. A subscriber on a free prepaid Lifeline plan must use the service at least once every:

- a) 7 days b) 15 days c) 30 days d) 60 days

4. If a federal Lifeline subscriber has no qualifying usage in 30 days, ConnectTo must:

- a) De-enroll immediately.
b) Begin a 15-day cure period, then de-enroll if there is still no usage.
c) Wait until annual recertification.
d) Charge the customer a fee.

5. Federal Lifeline subscriber records must be retained for at least:

- a) 1 year b) 3 years c) 7 years d) 10 years

6. Which of the following is PROHIBITED Lifeline marketing?

- a) Stating ConnectTo's legal name.
b) Offering a \$10 gift card to anyone who completes a Lifeline application.
c) Disclosing that Lifeline is a government benefit program.
d) Explaining the one-per-household rule in writing.

7. Which body administers the federal Lifeline program day-to-day?

- a) FCC b) USAC c) CPUC d) FTC

8. Who actually decides whether a California LifeLine applicant is eligible?

- a) ConnectTo's enrollment rep
- b) The California LifeLine Third-Party Administrator (TPA)
- c) USAC
- d) The applicant

9. Which of the following is NOT a federal qualifying program?

- a) SNAP
- b) Medicaid
- c) SSI
- d) Costco Membership

10. The unique identifier you must use for every NV/NLAD transaction is your:

- a) Employee number
- b) Personal phone number
- c) RAD Rep ID
- d) Email password

11. A subscriber tells you their cousin already has Lifeline at the same address. You should:

- a) Tell the subscriber to mark themselves as an independent household so they qualify.
- b) Explain the one-per-household rule and provide the Household Worksheet for the subscriber to complete truthfully.
- c) Enroll them anyway since the cousin is a different person.
- d) Refuse and tell them Lifeline is not for them.

12. Submitting an application without speaking to the actual subscriber is:

- a) Allowed if you have their documents.
- b) A federal violation that can result in termination and prosecution.
- c) Allowed if a family member authorizes you.
- d) A common practice.

13. ConnectTo's compensation policy for Lifeline-facing employees is:

- a) Per-enrollment commission of \$5/application.
- b) Fixed wage or salary; no per-enrollment commissions, bonuses, spiffs, or contests.
- c) Hourly plus a \$50 bonus for every approved application.
- d) Tip-based.

14. The software ConnectTo uses to qualify, enroll, activate, and manage Lifeline customers is:

- a) Excel
- b) Owlup
- c) Salesforce CRM
- d) USAC's NV portal alone

15. The maximum civil forfeiture per FCC violation (subject to inflation adjustment) is in the range of:

- a) \$1,000
- b) \$25,000
- c) \$237,000+
- d) \$5

16. Which of the following is acceptable proof of program eligibility?

- a) An EBT card by itself.

- b) A current Medi-Cal benefit award letter.
- c) A friend's verbal confirmation.
- d) A photo of the consumer at a benefits office.

17. If you suspect a coworker is committing Lifeline fraud, you should:

- a) Confront the coworker.
- b) Report it to the ConnectTo Compliance Officer or USAC OIG hotline (1-888-203-8100).
- c) Ignore it.
- d) Tell the customer.

Section B — True or False (T / F)

- 18. ___ It is acceptable to share my Owlup credentials or RAD Rep ID with a coworker if they need to enroll a customer fast.
- 19. ___ Lifeline benefits are transferable to other people.
- 20. ___ I may offer a \$5 Starbucks card to a customer who agrees to enroll.
- 21. ___ I must explain the one-per-household rule to every applicant.
- 22. ___ A consumer may have Lifeline on more than one phone line for their household.
- 23. ___ Federal Lifeline subscribers must recertify every year.
- 24. ___ Customer documentation may be stored on my personal phone for convenience.
- 25. ___ It is a federal crime to make a false statement on a Lifeline application.
- 26. ___ California LifeLine and federal Lifeline are the same program with the same administrator.
- 27. ___ I must complete the Household Worksheet for the customer to make sure it's filled out right.
- 28. ___ ConnectTo employees may accept a per-enrollment bonus from a third-party agency.

Section C — Short Answer

29. List three (3) federal programs that qualify a consumer for Lifeline.

- 1) _____ 2) _____ 3) _____

30. State, in your own words, who decides whether a consumer is eligible for federal Lifeline and who decides for California LifeLine.

Federal:

California:

31. What do you do if a customer asks a question you don't know the answer to?

Score: _____ / 31 Pass / Fail (circle one): **PASS** **FAIL**

Reviewed by (ConnectTo Compliance Officer / Supervisor):

Date: _____ Signature:

16. Employee Acknowledgment and Certification

PLEASE READ EACH STATEMENT CAREFULLY BEFORE SIGNING.

By signing below, I certify that:

30. I have received, read, and understand the entire ConnectTo Communications, Inc. Lifeline Sales Employee Handbook, Rules and Training Manual, including federal (FCC/USAC) rules and California (CPUC/TPA) LifeLine rules.
31. I have completed the required Knowledge Assessment in Section 15 and reviewed any incorrect answers with my supervisor or the ConnectTo Compliance Officer.
32. I understand that Lifeline is a federal and state benefit program funded with public money and that strict rules apply to its sale, marketing, enrollment, recertification, and customer support.
33. I understand that ConnectTo does not make eligibility decisions — USAC decides federal eligibility through the National Verifier, and the California LifeLine Third-Party Administrator decides California eligibility under CPUC rules.
34. I understand the one-per-household rule and how to apply it correctly.
35. I understand that I must use only my own RAD Rep ID and my own Owlup credentials for every transaction, and that I will never share, lend, or borrow Rep IDs or login credentials.
36. I understand that I will perform all ConnectTo Lifeline work in Owlup, on ConnectTo-issued encrypted devices, and that I will not copy, photograph, screenshot, email, or otherwise remove customer information from Owlup.
37. I understand that I must use only ConnectTo-approved scripts and disclosures and that I may not improvise responses to compliance-related questions.
38. I understand and accept that ConnectTo does NOT pay any commission, bonus, spiff, contest prize, gift card, or other variable per-enrollment compensation for Lifeline; my compensation is fixed wage or salary; and I will report any offer or payment to the contrary.
39. I understand that offering or providing any incentive (cash, gift card, prize, gift, sweepstakes, or other thing of value) to a consumer in exchange for a Lifeline application or enrollment is strictly prohibited.
40. I understand that I must protect customer information at all times in accordance with federal CPNI rules, the CCPA/CPRA, and ConnectTo's privacy policies.
41. I understand that violations of Lifeline rules can result in immediate termination, personal civil and criminal liability, and permanent debarment from the Lifeline program.

- 42. I agree to immediately report any suspected violation, fraud, or compliance concern to the ConnectTo Compliance Officer or to the USAC OIG hotline (1-888-203-8100), and I understand I am protected from retaliation for any good-faith report.
- 43. I agree to complete annual refresher training and any additional training ConnectTo assigns.
- 44. I understand that this acknowledgment will be retained in my training file for at least ten (10) years.

Employee Information

Employee Full Name (printed): _____

Employee Job Title / Role: _____

Employee RAD Rep ID (if applicable):

Employee Signature: _____

Date: _____

Witness / Trainer

Trainer Name (printed): _____

Trainer Signature: _____

Date: _____

ConnectTo Compliance Officer Review

Compliance Officer Name (printed):

Compliance Officer Signature: _____

Date Filed in Training Records: _____

FINAL REMINDER

By signing above, you are certifying — under ConnectTo Communications, Inc.'s compliance policy and as a representation that may be reviewed by USAC, the FCC, the CPUC, the California TPA, and federal/state auditors — that you have been trained on Lifeline rules and that you will follow them. Take this seriously. Your job, ConnectTo's ETC designation, and the integrity of a critical safety-net program for low-income Americans depend on it.

Visit www.ConnectTo.com for company information and www.ConnectTo.com/lifeline for the public Lifeline page.