Exhibit 1

IM Telecom, LLC d/b/a Infiniti Mobile's Proposed Plan of Compliance with the FCC's Third Report and Order, Further Report and Order, and Order on Reconsideration IM Telecom, LLC d/b/a Infiniti Mobile submits the following Proposed Plan of Compliance with the FCC's *Third Report and Order*, *Further Report and Order*, and *Order on Reconsideration* ("Third Order"), effective date December 1, 2016:

1. <u>Implementation of the National Verifier</u>:

- a. The Company will fully comply with Commission requirements with respect to the use of the Lifeline Eligibility Database (LED) with respect to verification of enrollees in the federal Lifeline program, in accordance with the schedule set forth in the FCC's *Third Order*:
 - i. At least five (5) states by December 31, 2017;
 - ii. At least twenty (20) states by December 31, 2018; and
 - iii. In all states and territories by December 31, 2019.
- b. The Company will utilize said National Verifier to the extent it offers Lifeline-supported services in states wherein USAC has successfully deployed it according to the above-referenced timeline.

2. <u>Implementation of Minimum Service Standards and Phasing Out of Standalone Voice Service Offerings</u> by November 30, 2019:

- a. The Company will comply with the FCC's increasing minimum service standards for mobile voice services, by offering at least 500 minutes of standalone voice service on or before December 1, 2016; offering at least 700 minutes of standalone voice service on or before December 1, 2017; and offering at least 1,000 minutes of standalone voice service on or before December 1, 2018.
- b. On or before December 1, 2019, the Company intends to offer a mix of voice service as well as broadband internet access service (BIAS), compliant with then-current standards for data service.

3. <u>Incorporation of Data-Capable Handsets / Equipment:</u>

- a. The Company will ensure that all handset devices provided to eligible Lifeline customers who access the Company's standalone voice service or mobile broadband services is Wi-Fi enabled after the effective date of section 54.408(f) of the new rules (no earlier than December 1, 2016).
- b. The Company will further comply with the Commission's phasing-in requirements that a certain percentage of devices offered for use with a mobile broadband service be "hotspot-capable" or capable of "tethering" according to the following schedule:
 - i. As of December 1, 2016, at least one should the Company offer mobile broadband service;
 - ii. As of December 1, 2017, at least 15 percent of devices, should the Company offer mobile broadband service;
 - iii. As of December 1, 2018, at least 20 percent of devices, should the Company offer mobile broadband service;
 - iv. As of December 1, 2019, at least 25 percent of devices;
 - v. As of December 1, 2020, at least 35 percent of devices;
 - vi. As of December 1, 2021, at least 45 percent of devices;
 - vii. As of December 1, 2022, at least 55 percent of devices;
 - viii. As of December 1, 2021, at least 65 percent of devices; and
 - ix. As of December 1, 2024, and onward, at least 75 percent of devices.

4. Incorporation of Broadband Internet Access Service (BIAS):

a. On or before December 1, 2019, the Company will offer Lifeline customers a voice and broadband "bundle," which will meet the data usage service standards applicable at said time.

5. <u>Streamline Eligibility for Lifeline Support</u>:

- a. The Company enroll customers in Lifeline-supported service only who qualify for and participate in one of the following assistance programs: (1) SNAP; (2) Medicaid; (3) Supplemental Security Income (SSI); (4) Federal Public Housing Assistance (FPHA) and (5) Veterans Pension Benefit.
- b. The Company will use no other program or basis of qualification to receive support from the federal universal service fund (USF).
- c. The Company will utilize only one of the aforementioned five (5) programs on December 1, 2016, or following PRA approval, whichever is later.