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September 24, 2020

VIA ELECTRONIC DELIVERY

State of New Jersey
Board of Public
Utilities
44 South Clinton Avenue, 9th
Floor Post Office Box 350
Trenton, New Jersey 08625-0350

Re: Petition of Xchange Telecom LLC for Designation as an
Eligible Telecommunications Carrier in the State of New
Jersey

To Whom it May Concern,

Xchange Telecom LLC (“Xchange” or the “Company”) hereby submits the attached Petition for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of New Jersey electronically in accordance with Order issued March 19, 2020 in Docket No. EO20030254. This submission is because the Board has not acted favorably on Xchange’s prior submissions, TO09080717 & TO09080718 dated August 28, 2009; and TO12050387 dated May 16, 2012. At the advice of Board staff, due to the changing nature of the FCC regulations since Xchange’s first submission, Xchange is resubmitting its petition.

Xchange would request expedited review of Xchange’s petition. The citizens of the State of New Jersey are suffering from the after-effect of the COVID-19 pandemic. The Board is no stranger to its effects to low-income residents of the State. Thus, Xchange believes it is of utmost importance that the Board ensure that the most vulnerable Americans are well served as they prepare for and respond to the COVID-19 virus conditions. Millions of low-income Americans, including residents of New Jersey, do not have access to affordable telecommunications services necessary to contact healthcare providers and access safe telemedicine services, obtain essential services, or survive in an online-only work and school environment—and many of these Americans are eligible for telecommunications services through the Lifeline program. At this critical time, it is vital that Xchange have the ability to offer Lifeline in the state of New Jersey in order to provide telemedicine solutions, enroll more eligible subscribers, and meet the life-threatening needs of many New Jersey residents. It is likewise vital that New Jersey residents have access to competitive alternatives.

Many low-income residents of New Jersey have limited access to healthcare in general, and specifically do not have access to telehealth solutions because they either do not have a device, such as a smart phone, to communicate with a healthcare provider, or they cannot afford the additional data required to seamlessly communicate remotely with healthcare providers. There is no time like the present to remove barriers and open up access to communications and healthcare.

Xchange proposes to offer Lifeline customers a plan that meets *both* minimum service standards (i.e. 1,000 voice minutes and 3 GB data as of Dec. 1, 2019) for no net cost after application of Lifeline support. Xchange proposes to also offer landline services, of 20/3 Mbps, with an optional voice component, and unlimited usage. Xchange's Lifeline service is uniquely suited to meet the needs of consumers now faced with rising data needs to account for telemedicine as well as enable working and schooling from home due to the COVID-19 pandemic. Introducing Xchange into the market as both a wireline and wireless ETC provider in New Jersey will help to close the widening gap for wireless and broadband services and quicken the ability to ensure Lifeline-eligible New Jersey residents have the safety net they need during this national emergency.

As detailed in the attached Petition, Xchange meets FCC requirements for designation as an ETC and such designation would serve the public interest. Xchange has already been granted ETC status in New York, for both wireline and wireless services. Xchange respectfully requests that the Board expeditiously issue an order granting the Company's request for ETC designation.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,



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Attachments

cc: Nathan Johnson
Kenneth Saffren, Esq. (NJ counsel)
Division of the Rate Counsel