

**STATEMENT OF COMMISSIONER MIGNON CLYBURN  
APPROVING IN PART AND CONCURRING IN PART**

Re: *Total Call Mobile, Inc.* File No.: EB-IHD-14-00017650

Total Call Mobile's actions were, in a word, reprehensible, which is why I support taking decisive enforcement action. This provider has not only violated our rules but also the trust of American consumers who contribute to the universal service fund. Today's Notice of Apparent Liability finds that Total Call Mobile enrolled the same consumers multiple times, without the customers' knowledge, by making slight changes to each consumer's identifying information. This is fraud, plain and simple and represents the very reason why the Commission just voted to eliminate Lifeline providers from determining a customer's eligibility. Preventing any provider from ever doing this again is why I advocated for the establishment of a neutral third party verifier to prevent such fraud in the future.

Providers that show such blatant disregard for our rules should not be part of the Lifeline program. I therefore support the decision to require Total Call Mobile submit a report and explain why the Commission should not revoke Total Call Mobile's compliance plan and suspend any future Lifeline payments to this company.

Given the egregious nature of the alleged conduct, I believe a more significant forfeiture would have been appropriate. The Commission cannot tolerate such abuse and must send a strong signal that providers that violate our rules will face significant consequences. I therefore vote to approve in part and concur in part.