

Docket Number: TC13-035
Subject Matter: First Data Request
Request to: Boomerang Wireless
Request from: South Dakota Public Utilities Commission Staff
Date of Request: 8/11/16
Responses Due: 9/9/16

- 1-1. Provide the average data usage per month for a Boomerang retail customer and another average for Lifeline customers.

RESPONSE: CONFIDENTIAL

- 1-2. Explain why the advertisements on pages 2, 3, 6, and 9 do not address point 8 from page 13, paragraph 27 of the amended application.

RESPONSE: Some of the marketing materials have a purpose other than “marketing materials describing the service” (from page 13, paragraph 27 of the amended application). The Banners are used to identify the enTouch Wireless when the event is taking place. The purpose of the Flyer and Poster is to reach out to the public prior to an event and inform them of the location and time of an upcoming enTouch Wireless Lifeline event; the Banners are used to identify the enTouch Wireless when the event is taking place; the ‘You Will Need’ Banner is to identify the what documentation they will need to apply for Lifeline benefit at an event.

The Welcome Insert (front & back document) is one of the inserts in the Lifeline device package that a new subscriber receives after being approved for the Lifeline program. The Welcome Insert purpose is to welcome the subscriber to enTouch; inform subscriber of what to do next, how to maintain their lifeline benefit, and how to get additional talk/text units or data to supplement their Lifeline benefit.

The standard language has been modified to incorporate point 8 from page 13, paragraph 27 of the amended application. The revised materials are attached as attachments:

- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2a NLAD Non-Tribal Flyer 11808 (Color) - 2016.08.31
- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2a NLAD Non-Tribal Poster (English) 11807 - 2016.08.31
- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2b NLAD Non-Tribal Banner #1 (English) 11803 - 2016.08.31
- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2d entouch Welcome Insert -11768- 2016.09.06

- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2g NLAD Banner #2 (You Will Need) 11782 - 2016.08.31

1-3. Provide a copy of the advertisement on page 4 that has all of the words legible.

RESPONSE: The placemat has been separated into two halves for easier viewing. The English portion of the "Disclosure" column and the "Important" column are also listed separately for viewing. See attachment A-10- BmgSDNon-Rural_DR-3 Responses, Att1_3 SD Placemat Blow Ups.

1-4. Explain why the advertisement on page 7 doesn't address points 2, 3, 4, 5, 6, and 8 from page 13, paragraph 27 of the amended application.

RESPONSE: The Airfair Bag Insert (advertisement on page 7) is one of the inserts in the Lifeline device package that a new subscriber receives after being approved for the Lifeline program. The Airfair Bag Insert is to inform a subscriber about how to get additional talk/text units or data to supplement their Lifeline benefit on their phone. These plans are not part of the Lifeline offering or regulated through the Lifeline program or describe the Lifeline program.

1-5. Explain why the advertisement on page 8 doesn't address points 1, 2, 3, 4, 5, 6, and 8 from page 13, paragraph 27 of the amended application.

RESPONSE: The Data Insert (advertisement on page 8) is a tool that is included as one of inserts in the device package new enTouch Lifeline customers receive. Like the Airfair Bag Insert in Response 1-4 above, the Data Insert does not describe the supported Lifeline services. Rather, the Data Insert informs customers as to what a 100 MB of data can provide. This helps customers decide how much data they may want to purchase from Airfair top ups to supplement their Lifeline benefit.

1-6. In paragraph 15 of the Amended Application, it states that "Boomerang, together with its parent and sister companies, currently provides prepaid wireless services to more than 230,000 subscribers..." However, when one does a simple internet search for "Boomerang Wireless," all or nearly all results refer to a "Free Government Phone." Furthermore, the website, www.entouchwireless.com appears to exclusively target lifeline customers. Please explain.

1-6a) How many of the 230,000 subscribers referenced in paragraph 15 are subscribers to Boomerang, as opposed to a parent or sister company?

1-6b) How many of the subscribers in the response to 1-6a) are lifeline subscribers to Boomerang?

RESPONSE: CONFIDENTIAL

- 1-7) What percentage of the Applicant's revenues are derived from the sale of excess talk, text, and data?

RESPONSE: CONFIDENTIAL

- 1-8) Paragraph 24 states that the Applicant "employs Verizon, Sprint, AT&T, as well as other GSM carrier networks..." Please list other "other GSM networks" in South Dakota.

RESPONSE: T-Mobile.

- 1-9) Refer to paragraph 48. Describe what is meant by an "entry-level smart phone." What features would this phone have?

RESPONSE: Boomerang defines an entry-level smart phone based on the following characteristics:

- Screen size of 3.5" to 4";
- Operating system is an Android 2.3 or higher, iOS 7;
- Processor is Single-core;
- Internal Storage is 1GB – 8GB;
- Has SD Card Expansion capability (excluding iPhones)
- Handles up to 3G transmissions.

Some device examples are Samsung Fascinate, LG VS450, ZTE Majesty Z796C-1, Motorola MB810, and HTC 6350.

- 1-10) Paragraph 48 states that customers will need to provide their own phone for certain plans. Can phones from other major providers (Verizon and AT&T, for example) be activated for these plans?

RESPONSE: Yes, depending on several factors: 1) if there is coverage from Verizon, Sprint, AT&T, or T-Mobile (Boomerang's underlying carriers) at the consumer's location; 2) whether the device is CDMA (Verizon or Sprint) or GSM (AT&T or T-Mobile); and 3) whether the device is an unlocked phone.

- 1-11) What percentage of existing lifeline (non-tribal) customers exceed:
- a. 10 MB of data per month
 - b. 500 MB of data per month
 - c. 1 GB of data per month
 - d. 2 GB of data per month

RESPONSE: CONFIDENTIAL

- 1-12) What percentage of existing lifeline (non-tribal) customers exceed:
- a. 500 minutes used per month
 - b. 750 minutes used per month
 - c. 1,000 minutes used per month

RESPONSE: CONFIDENTIAL

- 1-13) Provide an updated list of customer complaints.

RESPONSE: See attachment A-10- BmgSDNon-Rural_DR-3 Responses, Att1_13 Complaint Matrix Summary Updated 2016-08-25.

- 1-14) Explain the role that Boomerang sales professionals will play in the enrollment process given that the use of the National Verifier is with a third party?

RESPONSE: The field agents will continue to do many of the same roles they do today: answer questions about the Lifeline program and rules (such Lifeline is a government assistance program, only one benefit per household, that the benefit is non-transferable, etc.); inform folks about the Lifeline plans (what options available, what might work best for their needs) and how

to supplement their benefit with additional services (how and where to find the top up cards, how to use them, etc.); assist in entering the application information and documentation into the enrollment platform system; guide the consumer as to what documentation has to be provided; assist the consumer with how to activate, set-up and use their phones.

- 1-15) Prior to the addition of the National Verifier, in DR1-14 the response was no sales professionals would be paid a commission. Will any Boomerang sales professionals now get paid commission based on the number of customers enrolled now that the National Verifier will verify the eligibility of potential customers?

RESPONSE: No, Boomerang does not anticipate going to commission-based payment for sales force submitting applications. Boomerang chooses not employ a process that would tempt an employee or field agent to engage in waste, fraud and abuse of the program.

- 1-16) On page 3, footnote number 3, of the amended application filed July 15 it states, "enTouch Wireless will supplement this Application prior to December 1, 2016 to update all its Lifeline plans with expanded voice or data components meeting the minimum service requirements applicable under the 2016 Lifeline Order." Provide a projected date that these updates to the Lifeline plans will be made.

RESPONSE: In this amended application, Boomerang already offers the 500 Minute Plan (see paragraph 47) and the Tribal 1100 Free Unit Plan that meet the minimum service requirement for voice telephony service. Boomerang is still developing plans, but does not have a date at this time.

Docket Number: TC13-035
Subject Matter: First Data Request
Request to: Boomerang Wireless
Request from: South Dakota Public Utilities Commission Staff
Date of Request: 8/11/16
Responses Due: 9/9/16

- 1-1. Provide the average data usage per month for a Boomerang retail customer and another average for Lifeline customers.

RESPONSE: CONFIDENTIAL

- 1-2. Explain why the advertisements on pages 2, 3, 6, and 9 do not address point 8 from page 13, paragraph 27 of the amended application.

RESPONSE: Some of the marketing materials have a purpose other than “marketing materials describing the service” (from page 13, paragraph 27 of the amended application). The Banners are used to identify the enTouch Wireless when the event is taking place. The purpose of the Flyer and Poster is to reach out to the public prior to an event and inform them of the location and time of an upcoming enTouch Wireless Lifeline event; the Banners are used to identify the enTouch Wireless when the event is taking place; the “You Will Need” Banner is to identify the what documentation they will need to apply for Lifeline benefit at an event.

The Welcome Insert (front & back document) is one of the inserts in the Lifeline device package that a new subscriber receives after being approved for the Lifeline program. The Welcome Insert purpose is to welcome the subscriber to enTouch; inform subscriber of what to do next, how to maintain their lifeline benefit, and how to get additional talk/text units or data to supplement their Lifeline benefit.

The standard language has been modified to incorporate point 8 from page 13, paragraph 27 of the amended application. The revised materials are attached as attachments:

- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2a NLAD Non-Tribal Flyer 11808 (Color) - 2016.08.31
- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2a NLAD Non-Tribal Poster (English) 11807 - 2016.08.31
- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2b NLAD Non-Tribal Banner #1 (English) 11803 - 2016.08.31
- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2d entouch Welcome Insert -11768-2016.09.06

- A-10- BmgSDNon-Rural_DR-3 Responses, Att1_2g NLAD Banner #2 (You Will Need) 11782 - 2016.08.31

1-3. Provide a copy of the advertisement on page 4 that has all of the words legible.

RESPONSE: The placemat has been separated into two halves for easier viewing. The English portion of the "Disclosure" column and the "Important" column are also listed separately for viewing. See attachment A-10- BmgSDNon-Rural_DR-3 Responses, Att1_3 SD Placemat Blow Ups.

1-4. Explain why the advertisement on page 7 doesn't address points 2, 3, 4, 5, 6, and 8 from page 13, paragraph 27 of the amended application.

RESPONSE: The Airfair Bag Insert (advertisement on page 7) is one of the inserts in the Lifeline device package that a new subscriber receives after being approved for the Lifeline program. The Airfair Bag Insert is to inform a subscriber about how to get additional talk/text units or data to supplement their Lifeline benefit on their phone. These plans are not part of the Lifeline offering or regulated through the Lifeline program or describe the Lifeline program.

1-5. Explain why the advertisement on page 8 doesn't address points 1, 2, 3, 4, 5, 6, and 8 from page 13, paragraph 27 of the amended application.

RESPONSE: The Data Insert (advertisement on page 8) is a tool that is included as one of inserts in the device package new enTouch Lifeline customers receive. Like the Airfair Bag Insert in Response 1-4 above, the Data Insert does not describe the supported Lifeline services. Rather, the Data Insert informs customers as to what a 100 MB of data can provide. This helps customers decide how much data they may want to purchase from Airfair top ups to supplement their Lifeline benefit.

1-6. In paragraph 15 of the Amended Application, it states that "Boomerang, together with its parent and sister companies, currently provides prepaid wireless services to more than 230,000 subscribers..." However, when one does a simple internet search for "Boomerang Wireless," all or nearly all results refer to a "Free Government Phone." Furthermore, the website, www.entouchwireless.com appears to exclusively target lifeline customers. Please explain.

1-6a) How many of the 230,000 subscribers referenced in paragraph 15 are subscribers to Boomerang, as opposed to a parent or sister company?

1-6b) How many of the subscribers in the response to 1-6a) are lifeline subscribers to Boomerang?

RESPONSE: CONFIDENTIAL

- 1-7) What percentage of the Applicant's revenues are derived from the sale of excess talk, text, and data?

RESPONSE: CONFIDENTIAL

- 1-8) Paragraph 24 states that the Applicant "employs Verizon, Sprint, AT&T, as well as other GSM carrier networks..." Please list other "other GSM networks" in South Dakota.

RESPONSE: T-Mobile.

- 1-9) Refer to paragraph 48. Describe what is meant by an "entry-level smart phone." What features would this phone have?

RESPONSE: Boomerang defines an entry-level smart phone based on the following characteristics:

- Screen size of 3.5" to 4";
- Operating system is an Android 2.3 or higher, iOS 7;
- Processor is Single-core;
- Internal Storage is 1GB – 8GB;
- Has SD Card Expansion capability (excluding iPhones)
- Handles up to 3G transmissions.

Some device examples are Samsung Fascinate, LG VS450, ZTE Majesty Z796C-1, Motorola MB810, and HTC 6350.

- 1-10) Paragraph 48 states that customers will need to provide their own phone for certain plans. Can phones from other major providers (Verizon and AT&T, for example) be activated for these plans?

RESPONSE: Yes, depending on several factors: 1) if there is coverage from Verizon, Sprint, AT&T, or T-Mobile (Boomerang's underlying carriers) at the consumer's location; 2) whether the device is CDMA (Verizon or Sprint) or GSM (AT&T or T-Mobile); and 3) whether the device is an unlocked phone.

- 1-11) What percentage of existing lifeline (non-tribal) customers exceed:
- a. 10 MB of data per month
 - b. 500 MB of data per month
 - c. 1 GB of data per month
 - d. 2 GB of data per month

RESPONSE: CONFIDENTIAL

- 1-12) What percentage of existing lifeline (non-tribal) customers exceed:
- a. 500 minutes used per month
 - b. 750 minutes used per month
 - c. 1,000 minutes used per month

RESPONSE: CONFIDENTIAL

- 1-13) Provide an updated list of customer complaints.

RESPONSE: See attachment A-10- BmgSDNon-Rural_DR-3 Responses, Att1_13 Complaint Matrix Summary Updated 2016-08-25.

- 1-14) Explain the role that Boomerang sales professionals will play in the enrollment process given that the use of the National Verifier is with a third party?

RESPONSE: The field agents will continue to do many of the same roles they do today: answer questions about the Lifeline program and rules (such Lifeline is a government assistance program, only one benefit per household, that the benefit is non-transferable, etc.); inform folks about the Lifeline plans (what options available, what might work best for their needs) and how

to supplement their benefit with additional services (how and where to find the top up cards, how to use them, etc.); assist in entering the application information and documentation into the enrollment platform system; guide the consumer as to what documentation has to be provided; assist the consumer with how to activate, set-up and use their phones.

- 1-15) Prior to the addition of the National Verifier, in DR1-14 the response was no sales professionals would be paid a commission. Will any Boomerang sales professionals now get paid commission based on the number of customers enrolled now that the National Verifier will verify the eligibility of potential customers?

RESPONSE: No, Boomerang does not anticipate going to commission-based payment for sales force submitting applications. Boomerang chooses not employ a process that would tempt an employee or field agent to engage in waste, fraud and abuse of the program.

- 1-16) On page 3, footnote number 3, of the amended application filed July 15 it states, "enTouch Wireless will supplement this Application prior to December 1, 2016 to update all its Lifeline plans with expanded voice or data components meeting the minimum service requirements applicable under the 2016 Lifeline Order." Provide a projected date that these updates to the Lifeline plans will be made.

RESPONSE: In this amended application, Boomerang already offers the 500 Minute Plan (see paragraph 47) and the Tribal 1100 Free Unit Plan that meet the minimum service requirement for voice telephony service. Boomerang is still developing plans, but does not have a date at this time.