

**Docket Number:** TC13-035  
**Subject Matter:** Seventh Data Request  
**Request to:** Boomerang Wireless  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** 12/16/16  
**Responses Due:** 1/6/17

- 7-1. The advertisement below as posted on a social media page for EnTouch Wireless. Explain the following, 1) is this an advertisement for Lifeline services, and 2) if yes to 1, how will the company will ensure accepting fraudulent applications and/or duplication of services will not take place given the incentives for a potential customer to get a free phone and a current customer free data.



**Entouch Wireless**

September 28 at 12:15am ·

Want EXTRA F R E E data ?

Bring a friend to get a free smartphone with us and you receive 100 MB extra of data!



**RESPONSE:** Yes, this advertisement was for Lifeline services. However, it was a 30-day promotion targeted for CA only, and did not include South Dakota.

Regardless of the application source (Lifeline or non-Lifeline subscriber), all applications are vetted through Boomerang's enrollment process to ensure that an applicant is eligible for the Lifeline program. Eligibility verification for the Lifeline program includes multiple identification verifications and duplicate checks (which also use NLAD or state ID verification, inter-company and intra-company processes). All applications are screened through the same processes and

scrutiny regardless of any referrals. Also, the free smartphone was only available when the applicant was approved and enrolled in the Lifeline program, and the person making the referral only received the free 100 MB if the referred applicant was approved for Lifeline.

- 7-2. Provide the most recent twelve month financial information for Boomerang Wireless as well as the most recent financial reports similar to those given in response to data request 2-1.

**RESPONSE:** **CONFIDENTIAL** See **CONFIDENTIAL** attachment 7-2a for Boomerang's financial statement for the most recent 12 month period ending November 30, 2016. See attachment **CONFIDENTIAL** 7-2b for HH Ventures 2015 Audit Report.

- 7-3. Provide any updates and/or additions to Exhibit C – Officers to show how the technical capabilities requirement in 47 CFR §54.202(a)(4) is met by Boomerang. Also provide biographies of key upper-level managerial employees who will have a major role in how the Lifeline business is run.

**RESPONSE:** There are no changes to Exhibit C - Officer List. Attachment 7-3 contains the bios of the officers' bios (that were in Exhibit C) and the bios for key upper-level managerial employees with major roles in the Lifeline business.