

**Docket Number:** TC23-041  
**Subject Matter:** First Data Request  
**Request to:** TERRACOM INC. dba Maxsip Tel (TERRACOM)  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** February 8, 2024  
**Responses Due:** April 18, 2024

- 1-1. Provide a map, by wire center, of the area TERRACOM is requesting to serve, as revised by the Stipulation.  
**Response: Please see Exhibit 1-1. TERRACOM is requesting to serve the CenturyLink areas as revised by the Stipulation.**
- 1-2. Does TERRACOM intend on building any facilities in South Dakota?  
**Response: No, TERRACOM does not intend on building any facilities in South Dakota.**
- 1-3. Provide updated financial statements for 2023.  
**Response: CONFIDENTIAL**  
**Please see Exhibit 1-3 - financial statements for which the company is requesting confidential and proprietary treatment.**
- 1-4. South Dakota already has a Lifeline Only wireless ETC that utilizes the T-Mobile and AT&T networks. Explain, in detail, how your product will be different from the one they are offering.  
**Response: TERRACOM cannot specifically compare its product to a carrier that has not been identified. Regardless of product offering, however, it is clear that South Dakota customers are underserved by the existing ETCs in the state. See attached Exhibit 1-4 showing data from USAC on most recent Lifeline disbursements by carrier as of December 2023. To the best of TERRACOM's knowledge, the only prepaid wireless Lifeline-only ETC is Boomerang Wireless, who was serving only 48 customers. The top 2 carriers based upon disbursements were MIDCONTINENT COMMUNICATIONS, serving 2465 customers, and CINGULAR WIRELESS, which is listed as serving 340 Tribal customers only, all on a voice (not broadband) plan. According to USAC's most recent Lifeline Participation Rate data as of April 2023, a total of 6,149 customers were being served out of an estimated 77,737 Lifeline-eligible households, equating to only 8% participation rate in South Dakota.<sup>1</sup>**

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<sup>1</sup> [Program Data - Universal Service Administrative Company \(usac.org\)](https://www.usac.org/Program-Data)

1-5. Refer to pages 9 and 10 of the petition. Page 9 states “TERRACOM offers rate plans that provide its customers with minutes of use for local service at no additional charge.” But page 10 states “TERRACOM’s service, moreover, is not offered on a distance-sensitive basis and local and domestic long distance minutes are treated the same.” Explain how TERRACOM can guarantee they are not charging extra for local calls if all minutes, local and long distance, are treated the same.

**Response: The keyword in the citation from the petition is “additional,” and that language is taken directly from FCC rules. TERRACOM is not charging any additional fees for either local or long distance calls. Below is background of the requirement:**

**The FCC has concluded that carriers may satisfy the obligation to provide local usage via service offerings that bundle local and long distance minutes.<sup>[1]</sup> In its *USF/ICC Transformation Order*, the FCC revised 47 C.F.R. § 54.101(a) to reference minutes of use for local service “provided at no additional charge to end users,” and clarified that its original intent for local access minutes was “to ensure that consumers would not pay additional charges for message units on top of the rate charged for basic local service.”<sup>[2]</sup> TERRACOM offers rate plans that provide its customers with minutes of use for local and long distance service alike at no additional charge beyond the monthly plan rate (which is \$0 for Lifeline customers).**

1-6. Provide a name, direct line telephone number, email, and address for a contact person at TERRACOM the Commission will use to contact TERRACOM in the event we were to receive any consumer complaints or question.

**Response:**

**Tramell Johnson, Compliance & Audit Manager  
6650 E. Brainerd Rd., Suite 200, Chattanooga, TN 37421  
(Phone) (405) 479-8934  
(Fax) (877) 388-1083  
(E-Mail) [regulatory@terracominc.com](mailto:regulatory@terracominc.com); [tjohnson@terracominc.com](mailto:tjohnson@terracominc.com)**

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<sup>[1]</sup> See *Lifeline Reform Order*, ¶ 49.

<sup>[2]</sup> See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”), note 115.

- 1-7. Confirm TERRACOM will agree to cooperate with the South Dakota Public Utilities Commission to resolve consumer complaints.  
**Response: TERRACOM will cooperate fully with the South Dakota Public Utilities Commission to resolve all consumer complaints.**
- 1-8. Explain how TERRACOM handles consumer complaints and the process used by the company.  
**Response: Consumer complaints are typically received via inbound calls, emails or via state or federal regulatory agencies. Any complaint that involves a question of compliance is immediately directed to a senior person with the appropriate expertise and copied to the Chief Compliance Officer. These complaints are investigated and responded to by a senior executive or his or her designee with their involvement. Complaints not of a compliance nature are handled by supervisors and tracked by issue type. Tracking documents are shared with senior and executive management for review on a regular basis. TERRACOM will cooperate fully with the Commission to resolve all consumer complaints.**
- 1-9. What hours does TERRACOM have representatives available to handle consumer inquires and complaints?  
**Response: Customer service is available Monday through Friday from 10:00AM to 7:00PM EDT via phone (toll-free 888-716-8880) or online chat. Subscribers can also initiate support tickets 24 hours a day 7 days a week via an online chat and customer service representatives respond during the above-mentioned support hours.**
- 1-10. Refer to the Company Overview on page 3 and 4 of the Petition. When will the Stock Purchase Agreement by and among TERRACOM; Global Reconnect, LLC; and Maxsip be finalized?  
**Response: Upon FCC approval of the 5th Revised Compliance Plan.**
- 1-11. Has the FCC approved TERRACOM's 5<sup>th</sup> Revised Compliance Plan filed with the FCC on March 1, 2023? If not, provide the status of the filed plan?  
**Response: TERRACOM's 5th Revised Compliance Plan remains pending with the FCC.**
- 1-12. Confirm the 5<sup>th</sup> Revised Compliance Plan, if approved by the FCC, will transfer and apply to TERRACOM Inc. dba Maxsip Tel when the Stock Purchase Agreement between TERRACOM; Global Reconnect, LLC; and Maxsip is finalized.  
**Response: The 5th Revised Compliance Plan will apply to TERRACOM Inc. dba Maxsip Tel. Compliance plans don't transfer, they remain with the approved company. TERRACOM is and will remain the entity to which the Compliance Plan applies and in the interim is fully capable of meeting the obligations and increasing subscribership. FCC approval of the 5th Revised Compliance Plan will simply approve the transfer of 100% ownership, as is customary in the industry.**

- 1-13. If a lifeline customer reaches their data allotment for the month, is the customer prevented from using additional data? Or do they continue to use data and then receive a bill at the end of the period? If they are not prevented from using additional data, are they notified the allotment is reached and that additional charges will be incurred if more data is used?

**Response: The customer would not be able to use more than 4.5 GB of data unless they purchased additional data. TERRACOM's Lifeline service is prepaid, therefore customers must purchase service in advance and are never able to accumulate usage towards a bill.**

- 1-14. How much is additional data for a lifeline customer? Is this rate consistent with cost for non-lifeline customers?

**Response: Yes, rates are consistent with Lifeline and non-Lifeline.**

**Data upgrade options for broadband base plans: Top Up Data.**

All States	\$5.00	\$10.00	\$20.00	\$30.00
Data	250 MB	500 MB	1 GB	1.5 GB

- 1-15. If a lifeline customer reaches their minute allotment for the month, is the customer prevented from using additional minutes? Or can the customer continue to use minutes and then receive a bill at the end of the period? If they customer is not prevented from using additional minutes, is the customer notified the minute allotment has been reached and that additional charges will be incurred if more minutes are used?

**Response: The customer would not be able to use more than their allotted minutes unless they purchased additional minutes. TERRACOM's Lifeline service is prepaid, therefore customers must purchase service in advance and are never able to accumulate usage towards a bill.**

- 1-16. How much does it cost to purchase additional minutes for a lifeline customer? Is this rate consistent with cost for non-lifeline customers? Is this a per minute charge?

**Response: Yes, rates are consistent with Lifeline and non-Lifeline.**

**Voice upgrade options for voice base plans: Top Up Voice.**

All States	\$5.00	\$10.00	\$20.00	\$30.00
Voice Minutes	250	500	1000	1500
Text	N/A	N/A	N/A	N/A

- 1-17. Do text messages received by a lifeline customer count toward the customer's 1,000 text messages for the month?

**Response: Yes, the text allotment is for sent and received; however, text messages from TERRACOM do not count against a customer's usage.**

- 1-18. If a lifeline customer reaches their text allotment for the month, is the customer prevented from sending and receiving additional texts? Or can the customer continue to text and then receive a bill at the end of the period? If they customer is not prevented from sending and receiving additional texts, is the customer notified the text allotment has been reached and that additional charges will be incurred if more texts are sent or received?  
**Response: Once the text allotment has been reached no additional text messages are available.**
- 1-19. How much does it cost to purchase additional texts for a lifeline customer? Is this rate consistent with cost for non-lifeline customers? Is this a per text charge?  
**Response: N/A, the need for additional text messages has never been an issue.**
- 1-20. What percent of TERRACOM's current lifeline subscribers purchase additional data? Texts? Voice minutes?  
**Response: TERRACOM will supplement with this response as soon as possible.**
- 1-21. What is the average term new lifeline customers take service from TERRACOM? What percentage of new lifeline customers cancel service from TERRACOM within 6 months?  
**Response: TerraCom doesn't require a term commitment from its customers. Due to this, its churn can vary widely (some periods less than 1%, others over 10%). This is highly dependent on a multitude of factors, including then current competition in the market and any promotions by competitors. Competition is the greatest driver of ever increasing options and sustainable connectivity for low income families and we applaud this evolution as far too many poor American suffer from lack of options.**
- 1-22. What percent of TERRACOM'S lifeline customers are deactivated due to non-use?  
**Response: Disconnection via non-usage, often called « Quiet quitting » in the industry was 24.99% of in 2022, 15.10% in 2023.**
- 1-23. Refer to page 17 of the Petition. Do customers need to apply for Lifeline with the National Lifeline Eligibility Verifier and then apply for lifeline service with TERRACOM? Does the Customer need to provide TERRACOM with documentation of the National Lifeline Eligibility Verifier's determination, or can TERRACOM obtain the information independently? Will TERRACOM assist potential customers with the National Lifeline Eligibility Verifier application? Is TERRACOM responsible for the annual re-certification of subscriber's Lifeline eligibility, or is a customer required to complete that process with the National Lifeline Eligibility Verifier? Will TERRACOM provide lifeline customers with a notice of the requirement to re-certify before the annual re-certification date?  
**Response: Customers apply to the National Verifier then apply to TerraCom who confirms the approval by the National Verifier electronically.**

1-24. Provide the number of Lifeline customers TERRACOM has in each state it offers service. Separate out by Tribal and non-Tribal customers.

**Response:**

<b>State</b>	<b>Non-Tribal Count</b>
AK	2
AL	74
AR	631
AZ	6084
CO	1360
GA	4801
IA	138
IL	6054
IN	1109
KS	253
KY	671
LA	4045
MD	3340
ME	85
MN	563
MO	458
MS	270
NE	163
NV	2280
NY	21993
OH	2449
OK	335
PA	4050
RI	146
SC	60
TN	954
UT	99
VA	82
WA	447
WI	1369
WV	138
<b>Grand Total</b>	<b>64503</b>

<b>State</b>	<b>Tribal Count</b>
OK	605
WA	65
<b>Grand Total</b>	<b>670</b>

1-25. Provide the number of non-Lifeline customers TERRACOM has in each state it offers service.

**Response: It is currently de-minimus due to focusing capital resources to EBB and ACP.**

1-26. Refer to page 20 of the Petition, TERRACOM quotes that the goals of the Telecommunications Act include, “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies”. Explain the following:

a) How an additional Lifeline only ETC who provides \$0 service like other Lifeline only ETCs can “secure lower prices”?

**Response: Incumbent carriers may lower prices in response to no cost Lifeline services. More providers creates more competition. Also, given that only 8% of eligible South Dakota customers are enrolled in Lifeline, there are 92% of Lifeline-eligible customers that either do not have service or who, if they enrolled with TERRACOM compared to most any other carrier, would receive lower prices given that TERRACOM’s rate would be \$0 after discounts.**

b) How a reseller of T-Mobile and AT&T is better able to provide “higher quality of service for American telecommunications consumers” than already designated Lifeline Only ETC providers who resell T-Mobile and AT&T services.

**Response: The citation was a quote from the FCCs intent of the Telecommunications Act, which the existence of providers like TERRACOM facilitates in general. TERRACOM did not state that it would provide a “higher quality of service than existing designated Lifeline Only ETC” – that is a misreading of the Application—nor does TERRACOM believe that each new entrant needs to provide higher quality service than existing carriers; no one carrier can serve (or has, historically, served) all eligible customers. TERRACOM will help bring higher quality services in general to customers who are not already subscribed to another wireless ETC’s service, simply by nature of the fact that TERRACOM will be bringing mobile voice and broadband access to South Dakotans who otherwise would not have it.**

c) How a reseller of any underlying carrier can “encourage the rapid deployment of new telecommunication technologies” when that reseller does not install its own facilities?

**Response: See answer to (a) above. Competition encourages incumbent carriers to deploy new facilities.**

1-27. Provide a description of the plans, including details and pricing, for non-Lifeline customers in South Dakota. Are all the Lifeline plans available to non-Lifeline subscribers without the Lifeline discount? Can a customer have the Lifeline discount applied to a more expensive plan?

**Response: TerraCom offers the following retail plans:**

Usage Included			Monthly Retail Price
Voice (MOU)	SMS	Data (Gb)	
1000	1000	4.5	\$ 9.25
1000	1000	15	\$ 39.25
1000	1000	8	\$ 30.00
1000	1000	10	\$ 34.25
4000	4000	30	\$ 64.25
4000	4000	Unlimited	\$ 109.25

1-28. Will TERRACOM offer any other Lifeline plans in South Dakota besides what is provided in Exhibit 6? If so, provide the details and pricing of the other plans.

**Response: At this time no other plans are contemplated at launch.**

1-29. Are the plans provided in Exhibit 6 the same as TERRACOM’s plan offerings in other states? If TERRACOM offers different lifeline plans in other states, provide the details of each plan, specifying the state in which that plan is available.

**Response: The plans provided are the same plans offered in other states with the same available Lifeline subsidy (i.e. \$9.25 with no additional state funds).**

1-30. For each of TERRACOM’s Lifeline offerings in South Dakota, provide a breakdown of TERRACOM’s fixed cost and variable cost to serve a single Lifeline subscriber.

**Response: Since TERRACOM’s contracts with underlying carriers are confidential, TERRACOM objects to this question, since it cannot provide its primary cost, i.e., carrier airtime and data.**

1-31. Are there any locations in TERRACOM’s proposed service area that do not currently have a wireless Lifeline offering available to them? Are there any locations that do not have a prepaid wireless Lifeline offering available to them?

**Response: To the best of TERRACOM’s knowledge, there are no locations in TERRACOM’s proposed service area that do not currently have a wireless Lifeline offering available to them (or at minimum are not being marketed to), nor that do not have a prepaid wireless Lifeline offering available to them. Refer to attached Exhibit 1-4, which shows Lifeline reimbursements in South Dakota from USAC for Dec 2023. The only prepaid wireless ETC appears to be Boomerang, which had only 48 subscribers.**



- 1-32. Provide the details and pricing (including handset costs) of any prepaid Lifeline offerings by the wireless providers currently serving TERRACOM's proposed service area. Provide the details and pricing (including handset costs) of any postpaid Lifeline offerings by the wireless providers currently serving TERRACOM's proposed service area.  
**Response: The details and pricing (including handset costs) of any prepaid or postpaid Lifeline offerings by the wireless providers currently serving TERRACOM's proposed service area are contained in tariffs and websites of each Lifeline provider, which is publicly available information, and the tariffs are filed with the Commission.**
- 1-33. Will TERRACOM use Marketing Agents to enroll customers? If so, does TERRACOM compensate Marketing Agents based on enrollments? What procedures does TERRACOM have in place to assure its Marketing Agents do not misuse beneficiary data?  
**Response: Initially, TERRACOM will do on-line marketing only without the use of marketing agents. TERRACOM compensates any agents in accordance with FCC rules which prevent compensation based upon application for or enrollment in Lifeline. Please see attached CONFIDENTIAL Exhibit 1-33 for TERRACOM's Information Security Program.**
- 1-34. Provide the "Terms and Conditions" for plans and enrollment. Are these "Terms and Conditions" provided to the potential customer prior to enrollment?  
**Response: General terms and conditions are available on TERRACOM's website. Once approved in South Dakota, state specific information will be available to South Dakota consumers.**
- 1-35. What jurisdictions does TERRACOM provide services in that generate revenue outside of the Lifeline program? What was the breakdown of Lifeline revenue versus non-Lifeline revenue in 2022 and 2023?  
**Response: TerraCom has a long history of serving outside the lifeline market, however the lack of sound competition policy in wholesale access to critical inputs in landline and business services has driven TerraCom to focus on low-income subsidized programs.**
- 1-36. How will TERRACOM verify a potential customer resides in a tribal area? Does the National Verifier confirm a potential customer resides in a tribal area?  
**Response: Tribal eligibility is determined by NLAD at time of enrollment or transfer.**
- 1-37. Does TERRACOM utilize tribal/reservation government or other tribal/reservation administrative services to distribute phones to customers?  
**Response: Historically TerraCom has, however currently the focus has been on other geographic regions. When TerraCom is approved in additional tribal areas and with the winddown of ACP we will re-initialize our efforts and use our long-standing experience to work with tribal leaders as we have in the past.**
- 1-38. Does TERRCOM plan to enter, or has TERRACOM entered, into any agreements with a Tribe where TERRACOM would receive compensation for serving tribal areas?  
**Response: No.**

- 1-39. Provide a copy of all media sources used in the advertising of TERRACOM's services and charges, including point of sale materials, customer direct mail, customer brochures, and print media.  
**Response: At this time all TERRACOM enrollments are completed online, and most of TERRACOM's marketing materials are in digital format. See attached Exhibit 1-39 for an updated trifold brochure.**
- 1-40. Does TERRACOM anticipate geographic areas in South Dakota wherein customers may experience service issues due to inadequate coverage by the companies you have contracted with or intend to contract with? If so, what is the process and procedure for handling customer service issues after signing the individual up for services? Also, do you intend to make potential customers aware of potential coverage issues prior to enrolling customer?  
**Response: As contained in its application, TerraCom has multiple relationships and will be able to offer the most widespread coverage available. TerraCom does not enroll customers in areas where it cannot provide sufficient coverage. Should a customer need a device on a different network due to coverage TerraCom will swap their device at no charge.**
- 1-41. How does TERRACOM determine which underlying carrier will serve a customer? Can a customer elect a specific underlying carrier? Can a customer elect to switch underlying carriers if the customer is not satisfied with the service provided?  
**Response: TerraCom uses carrier propagation maps as well as ARC/GIS to overlay geographic areas and pre-determine the best carrier prior to marketing in a given area. Should a customer need a device on a different network due to coverage TerraCom will swap their device at no charge.**
- 1-42. Will TERRACOM provide a device to all new customers? Will TERRACOM provide a device to re-enrolled customers? Will TERRACOM provide a device to customers who previously received a device from a different Lifeline provider?  
**Response: For new subscribers TerraCom offers phones from free to \$50 at this time. SIM cards are free for new subscribers and in circumstances where necessary (i.e. customer's device is not compatible with any of the networks we use for our SIM card, we will provide a new device free of charge).**
- 1-43. If TERRACOM provides customers with a device, is the device new or refurbished?  
**Response: TERRACOM offers both new and refurbished devices.**
- 1-44. If refurbished, has TERRACOM had any quality issues with its refurbished handsets compared to new handsets?  
**Response: Typically we have not had quality issues due to our many years of experience in the wireless industry, but on occasion where there have been issues we replace the devices free of charge.**

- 1-45. Confirm that TERRACOM will not misrepresent refurbished phones as new phones in advertisements and when signing new customers up for service.  
**Response: TERRACOM will not misrepresent refurbished phones as new phones in advertisements and when signing new customers up for service.**
- 1-46. What types of devices will TERRACOM provide for free upon enrollment? Can the customer choose what type of device they will receive?  
**Response: TERRACOM offers both new and refurbished devices including the BLU C5L MAX, Maxwest Neo Flip, Alcatel Onetouch Pixi 7, Samsung Galaxy Tab A 8.0, and Samsung Galaxy Tab A 8.4 and the BLU M8L. TerraCom does its best to accommodate requests for specific free and purchased devices based on the current availability.**
- 1-47. Is there an option for a customer to choose an upgraded device? If so, provide all options for an upgraded device and the costs for each option?  
**Response: Yes, customers may upgrade by paying the difference. TERRACOM will supplement this response as soon as possible with upgraded device options and prices.**
- 1-48. Does TERRACOM have any control over its underlying carriers? If not, how will TERRACOM ensure the ability to remain functional in emergency situations?  
**Response: No, resellers do not exercise control over underlying carriers, however the underlying carriers are subject to their wholesale agreements and treat all end users the same in emergency situations.**
- 1-49. Explain how TERRACOM complies with ARSD 20:10:32:43.05 in offering a local usage plan comparable to the one offered by the incumbent local exchange carrier in the service area in which TERRACOM seeks designation. Provide the analysis done to compare the plans.  
**Response: TERRACOM seeks designation in the CenturyLink service area. To the best of TERRACOM's knowledge, CenturyLink offers either fixed internet or home phone service, not wireless phone service, at the following rates: Internet only \$55 per month for unlimited data at speeds up to 100 MBPS; Home phone only for \$50 per month with unlimited nationwide calling; or a bundle with both for \$95. TerraCom offers a basic plan with no monthly fee which provides both voice and data which are critical in today world for basic communications and these offering have demonstrated nationwide to have made a dramatic difference in connecting those who cannot afford \$55 per month, let along \$95.**
- 1-50. Explain how TERRACOM's Petition complies with ARSD 20:10:32:43.06.  
**Response: ARSD 20:10:32:43.06 states that "An applicant requesting designation as an eligible telecommunications carrier shall certify that it will be able to provide equal access to long distance carriers if no other eligible telecommunications carrier is providing equal access within the service area." Though this certification is no longer required under FCC rules, TERRACOM hereby certifies that it will be able to provide equal access to long distance carriers if no other eligible telecommunications carrier is providing equal access within the service area.**

- 1-51. What mobile broadband speed will Lifeline plans provide in tribal and non-tribal areas? Has TERRACOM confirmed this speed throughout the service area?  
**Response: 3G or greater in compliance with FCC minimum service standards. TERRACOM's underlying carriers generally already provide 4G throughout their entire network.**
- 1-52. Will TERRACOM provide Lifeline Services in South Dakota if ACP funding is not available?  
**Response: Yes.**
- 1-53. Confirm TERRACOM will file copies with the SD PUC of all applicable FCC Forms and Reports annually if this docket is approved, including but not limited to Form 555 and Form 481. What date will these be filed annually?  
**Response: TERRACOM will file copies with the SD PUC of all applicable FCC Forms and Reports annually if this docket is approved, including but not limited to Form 555 and Form 481.**
- 1-54. What is TERRACOM's proposed effective date to be designated as an ETC? Or, if no date is established, how soon after designation would TERRACOM intend to begin operating in South Dakota?  
**Response: TERRACOM's proposed effective date is April 25, 2024. This coincides with the expiration of the ACP shutdown.**
- 1-55. How will TERRACOM verify that the signal from the underlying carrier is adequate in all the requested service territory?  
**Response: TERRACOM will rely on the underlying carrier to determine adequate coverage; however, if a customer reports signal issues and wants to cancel, they are free to do so at any time with no consequences.**
- 1-56. Explain how TERRACOM will comply with the minimum service standards imposed on ETCs designated for Lifeline under 47 C.F.R. 54.408. Will all of TERRACOM's Lifeline plans in South Dakota meet these minimum service standards?  
**Response: TERRACOM will offer a single Lifeline plan in South Dakota for subscribers not residing on tribal lands that meets the minimum service standards for voice and data. A second plan offered to subscribers residing on tribal lands includes unlimited talk/text and 10GB data per month.**
- 1-57. Will TERRACOM furnish its own coverage information and maps to potential customers or rely on maps and coverage information from the underlying carriers?  
**Response: TERRACOM does not intend to furnish its own coverage information and maps to potential customers, but instead, will rely on maps and coverage information from the underlying carriers.**
- 1-58. Does TERRACOM plan to provide home internet or home telephone Lifeline services in South Dakota? Explain.  
**Response: TERRACOM does not plan to provide home internet or home telephone Lifeline services in South Dakota.**

1-59. Provide the name, address and telephone number of TERRACOM.

**Response: TERRACOM INC. d/b/a Maxsip Tel  
6650 E. Brainerd Rd., Suite 200, Chattanooga, TN 37421  
888-716-8880**

1-60. Will TERRACOM provide service coverage and quality maps to potential customers before providing service? If so, will TERRACOM furnish its own coverage maps, or rely on the underlying carrier's coverage maps?

**Response: The current ubiquity of coverage in the United States has made coverage maps less of an issue over time, and maps are all now presented in more real-time online. In the case of a rural state, we pride ourselves on choosing the best carrier for a given area based on our decades of experience. If a coverage map is needed our support personnel will work directly with the consumer to get them the correct map and if needed change their carrier to a more suitable network.**

1-61. Does TERRACOM currently offer Lifeline services in Tribal areas in any other state? If so, provide a list of all Tribal areas served.

**Response: TERRACOM provides tribal Lifeline service in Oklahoma and Washington to tribes within its designated ETC service area.**

1-62. Will TERRACOM have any storefronts or physical locations in South Dakota? Explain.

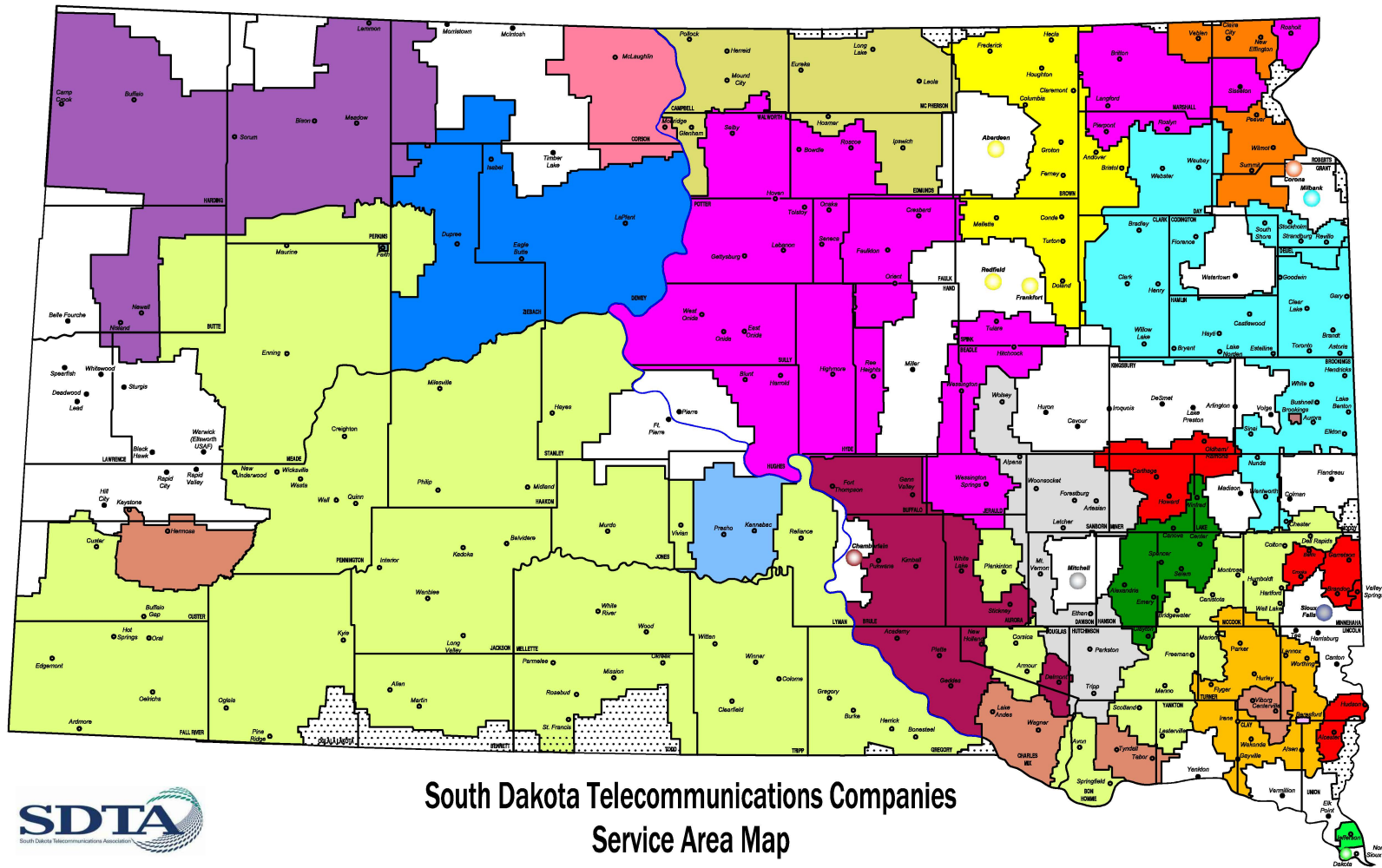
**Response: TERRACOM does not intend to have any storefronts or physical locations in South Dakota.**

1-63. Has TERRACOM received complaints regarding quality issues with any refurbished devices provided to customers? Does TERRACOM provide the customer with a different device if there are device quality issues?

**Response: Typically we have not due to our many years of experience in the wireless industry, but on occasion where there have been issues we replace the devices free of charge.**

**Exhibit 1-1**

**Service Area Map**



## South Dakota Telecommunications Companies Service Area Map

- |  |   |   |   |   |
|--|---|---|---|---|
| <ul style="list-style-type: none"> <li><span style="color: red;">■</span> Alliance Communications Cooperative - Garretson</li> <li><span style="color: purple;">■</span> Beresford Municipal Telephone Company - Beresford</li> <li><span style="color: blue;">■</span> Cheyenne River Sioux Tribe Telephone Authority - Eagle Butte</li> <li><span style="color: teal;">■</span> Faith Municipal Telephone Company - Faith</li> <li><span style="color: orange;">■</span> Fort Randall Telephone Company - Wagner</li> <li><span style="color: lightgreen;">■</span> Golden West Telecommunications - Wall</li> </ul> | <ul style="list-style-type: none"> <li><span style="color: cyan;">■</span> Interstate Telecommunications Cooperative - Clear Lake</li> <li><span style="color: yellow;">■</span> James Valley Telecommunications - Groton</li> <li><span style="color: lightblue;">■</span> Kennebec Telephone Company - Kennebec</li> <li><span style="color: orange;">■</span> Clarity Telecom d/b/a VastBroadband - Sioux Falls</li> </ul> | <ul style="list-style-type: none"> <li><span style="color: green;">■</span> Long Lines - Jefferson</li> <li><span style="color: lightgreen;">■</span> Long Lines (CLEC)</li> <li><span style="color: maroon;">■</span> Midstate Communications - Kimball</li> <li><span style="color: orange;">■</span> Midstate Communications (CLEC)</li> <li><span style="color: orange;">■</span> RC Technologies - New Effington</li> <li><span style="color: orange;">■</span> RC Technologies (CLEC)</li> <li><span style="color: grey;">■</span> Santel Communications Cooperative - Woonsocket</li> <li><span style="color: grey;">■</span> Mitchell Telecom (CLEC)</li> </ul> | <ul style="list-style-type: none"> <li><span style="color: brown;">■</span> Swiftel Communications - Brookings</li> <li><span style="color: green;">■</span> TrioTel Communications - Salem</li> <li><span style="color: yellowgreen;">■</span> Valley Telecommunications Cooperative - Herried</li> <li><span style="color: magenta;">■</span> Venture Communications Cooperative - Highmore</li> <li><span style="color: purple;">■</span> West River Cooperative Telephone Company - Bison</li> <li><span style="color: pink;">■</span> West River Telecommunications Cooperative - Hazen, ND</li> </ul> | <ul style="list-style-type: none"> <li><span style="border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> CenturyLink</li> <li><span style="background-color: black; width: 10px; height: 10px; display: inline-block;"></span> Other Companies</li> <li><span style="color: blue; font-size: 1.2em;">●</span> SDN Communications Base of Operations</li> </ul> |
|--|---|---|---|---|

**Published  
2015**  
Map Services Provided By  
 VantagePoint



**Exhibit 1-3**

**2023 Financial Statements**

**CONFIDENTIAL AND PROPRIETARY**



**Exhibit 1-4**

**USAC Data**

State	SPIN	Study Area Name	Lifeline \$	Mo/Year	# subs
SD	143031082	399014 JAMES VALLEY WIRELESS, LLC	\$25.00	Dec/2023	
SD	143002233	391667 GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.	\$33.00	Dec/2023	
SD	143002232	391405 ALLIANCE COMMUNICATIONS COOPERATIVE, INC	\$47.00	Dec/2023	
SD	143002240	391682 TRIOTEL COMMUNICATIONS, INC.	\$47.00	Dec/2023	
SD	143002154	399013 INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC.	\$76.00	Dec/2023	
SD	143002240	391669 TRIOTEL COMMUNICATIONS, INC.	\$76.00	Dec/2023	
SD	143002233	391640 GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.	\$86.00	Dec/2023	
SD	143002233	391684 GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.	\$94.00	Dec/2023	
SD	143002236	391664 JAMES VALLEY COOPERATIVE TELEPHONE COMPANY	\$104.00	Dec/2023	
SD	143002230	391653 CITY OF FAITH MUNICIPAL TELEPHONE COMPANY	\$107.00	Dec/2023	
SD	143002243	391674 ROBERTS COUNTY TELEPHONE COOPERATIVE ASSOCIATION	\$137.00	Dec/2023	
SD	143002227	391649 CITY OF BERESFORD	\$151.00	Dec/2023	
SD	143002239	391668 KENNEBEC TELEPHONE CO., INC.	\$161.00	Dec/2023	
SD	143002250	391685 VALLEY TELECOMMUNICATIONS COOPERATIVE ASSOCIATION, INC.	\$181.00	Dec/2023	
SD	143002255	391689 WEST RIVER COOPERATIVE TELEPHONE COMPANY	\$198.00	Dec/2023	
SD	143002233	391677 GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.	\$252.00	Dec/2023	
SD	143019465	399017 NORTHERN VALLEY COMMUNICATIONS LLC	\$255.00	Dec/2023	
SD	143002232	391642 ALLIANCE COMMUNICATIONS COOPERATIVE, INC	\$318.00	Dec/2023	
SD	143002244	391676 SANTEL COMMUNICATIONS COOPERATIVE	\$340.00	Dec/2023	
SD	143036595	399022 BOOMERANG WIRELESS LLC	\$348.00	Dec/2023	48
SD	143005231	395145 CENTURYLINK QWEST CORPORATION	\$359.00	Dec/2023	
SD	143030709	399011 MIDSTATE TELECOM, INC.	\$387.00	Dec/2023	
SD	143002154	391654 INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC.	\$418.00	Dec/2023	
SD	143002228	391650 CITY OF BROOKINGS TELEPHONE FUND	\$437.00	Dec/2023	
SD	143002232	391657 ALLIANCE COMMUNICATIONS COOPERATIVE, INC	\$678.00	Dec/2023	
SD	143002247	391680 VENTURE COMMUNICATIONS COOPERATIVE	\$1,251.00	Dec/2023	
SD	143034682	399020 STANDING ROCK TELECOM, INC	\$4,391.00	Dec/2023	
SD	143007716	391670 MIDSTATE COMMUNICATIONS, INC	\$4,804.00	Dec/2023	
SD	143002226	391647 CHEYENNE RIVER SIOUX TRIBE TELEPHONE AUTHORITY	\$6,035.00	Dec/2023	
SD	143002233	391659 GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.	\$6,291.00	Dec/2023	
SD	143002234	391660 MT. RUSHMORE TEL. CO.	\$6,570.00	Dec/2023	
SD	143002233	391686 GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.	\$7,420.00	Dec/2023	

SD	143029765	399015 CINGULAR WIRELESS	\$10,200.00	Dec/2023	340 (Tribal voice)
SD	143001179	399005 MIDCONTINENT COMMUNICATIONS	\$22,086.00	Dec/2023	2465

**Exhibit 1-33**

**Information Security Program**

**CONFIDENTIAL AND PROPRIETARY**

**Exhibit 1-39**

**Updated Trifold Brochure**



# About Us

Maxsip Telecom uses the federal program: Lifeline, to help lower the monthly cost of your phone or internet service.

**LET'S CONNECT**

[Maxsipconnects.com](https://Maxsipconnects.com)

Nebraska, Kansas, Utah, Idaho, Kentucky,  
see chart below.  
All other states follow the default category.

		Promo Plan for 1st 6 Months		
		Voice (MOU)	SMS	Data (Gb)
Lifeline	Default	1000	1000	4.5
Tribal Lifeline	Default	1000	1000	10
Lifeline	Nebraska	1583	1583	4.5
Lifeline	Kansas	3590	1000	4.5
Lifeline	Utah	1583	Unlimited	4.5
Tribal Lifeline	Utah	1583	1000	10
Lifeline	Idaho	1583	1583	4.5
Lifeline	Kentucky	Unlimited	1000	4.5

# FREE INTERNET





# Our NEW Lifeline plan

## Lifeline

Maxsip Telecom now utilizes the federal Lifeline program to reduce your monthly phone expenses.

## How to Qualify:

- If you participate in any ONE of these government benefit programs:
  - Supplemental Nutrition Assistance Program (SNAP)
  - Medicaid
  - Federal Public Housing Assistance (FPHA)
  - Veterans Pension and Survivors Benefits
  - Supplemental Security Income (SSI)

— OR —

**Lifeline:** If your income is at or below 135% of the federal poverty guidelines (for a family of 4 if income is less than \$40,500)

**If you live on Tribal lands, you may receive an additional discount towards your service and may be able to qualify through specific Tribal programs.**

### Receive free talk, text & high speed data



**Keep your Phone Number!**



**Free High Speed Internet**



**5GB of Monthly Data**



### Select from:



Phone



Tablet



SIM

DISCLAIMER: Lifeline is a government assistance program. Only eligible consumers may enroll in Lifeline. Lifeline service is non-transferable and limited to one discount per household. Lifeline services are provided by our trusted affiliate Terracom, Inc. d/b/a Maxsip Tel. Availability is limited to select states and specific zip codes.

[Maxsipconnects.com](https://Maxsipconnects.com)