

Docket Number: TC23-048
Subject Matter: First Data Request
Request to: Boomerang Wireless LLC dba enTouch Wireless (Boomerang)
Request from: South Dakota Public Utilities Commission Staff
Date of Request: November 6, 2023
Responses Due: Extended to December 5, 2023

- 1-1. Provide an update on how many customers have contacted Boomerang following receipt of the initial notices.

RESPONSE: As of December 1, 2023, six (6) of the 14 impacted subscribers in South Dakota have contacted Boomerang and made arrangements to port their services to Boomerang Wireless. One (1) subscriber of the 14 impacted subscribers is inactive (they no longer receive services from Boomerang), and seven (7) subscribers have not responded to our notices or out-reach efforts.

- 1-2. Refer to the petition, pages 2-3, where it states: "As a result of these changes approximately 14 subscribers in the former Verizon Wireless service area will be impacted, though none of the impacted subscribers reside in the proposed relinquished zip codes (listed in Exhibit B)."
a) Further explain how these subscribers are impacted when they do not reside in the proposed relinquished zip codes.

RESPONSE: The 14 subscribers are "impacted" because they receive their Lifeline services via Boomerang's underlying carrier, Verizon, and Boomerang seeks to eliminate Verizon as an underlying carrier. However, these 14 subscribers reside in areas where Boomerang has an alternate underlying carrier that can continue to provide Boomerang Lifeline services to these subscribers. So, these 14 subscribers have the option to change Lifeline service providers or to remain with Boomerang and keep their current services. To stay with Boomerang, these subscribers must contact Boomerang at the number provided (via the notices) and arrange to port their service to Boomerang's alternate underlying carrier, T-Mobile.

The Coverage Areas Boomerang seeks to relinquish are the Verizon Service Areas where Verizon is Boomerang's only underlying carrier within that zip code Coverage Area. As stated previously, Boomerang does not have any subscribers residing in the Verizon Service Areas to be relinquished. If there were subscribers residing in these areas where Verizon was our only underlying carrier, the subscribers would not have the option to remain with Boomerang for their services.

- b) Are these 14 customers the only customers Boomerang has utilizing the Verizon network in South Dakota?

RESPONSE: Yes, Boomerang has only 14 subscribers/customers utilizing the Verizon network in South Dakota.

- 1-3. Refer to the petition, page 3, where it goes on to state: "The impacted subscribers will need to choose whether to port their service to Boomerang's alternate underlying carrier, or to transfer their service to a new ETC designated service provider in their service area." Please describe the changes in service a customer will experience with either option. What other requirements will there be for customers with either option (for example, new SIM cards or new phones needed)?

RESPONSE: The impacted subscribers have two options:

- 1) Option 1: Subscribers can remain with Boomerang Wireless by porting their current services and phone number from Boomerang's underlying carrier, Verizon, to Boomerang's alternate underlying carrier, T-Mobile. Subscribers who choose this option will retain their Boomerang service offering, service dates, pricing, etc. And, except for the possible exception of a phone number change, there would be no updates or interruption of subscriber's enrollment in the Lifeline program in NLAD.

As a change of underlying carriers requires a porting process, the subscribers will receive a new SIM card and phone unless subscriber prefers to keep their current phone, provided a new Sim card can replace the old SIM card making the device compatible with the T-Mobile network. Likewise, their phone numbers will be ported as well unless the subscriber chooses otherwise.

- 2) Option 2: Subscribers also have the option to transfer their service to another service provider who provides Lifeline services in the area where the customer resides. Boomerang does not impose any notice requirements, termination fees or penalties for transferring services to another service provider. If a subscriber should choose to transfer their Lifeline service to another ETC, the USAC website has a 'Company Near Me' tool that identifies a list of designated ETC (Lifeline) service providers and their phone numbers, available based on the zip code the customer resides in.

The services available to the customer will depend on the service provider's Lifeline service offerings. Depending on USAC and/or the new service provider processes, the customers may have to complete application(s), additional form(s), provide documentation, etc. to USAC and/or the new service provider. Customers may also need a new SIM and/or device. If the subscriber wants to keep their current phone number, they will need to 'port' their current phone number to the new service provider before disconnecting their services from Boomerang.

- 1-4. Refer to the maps filed in Docket TC13-035 in response to Staff's Data Request 12-1 through 12-6, and Exhibit B attached to the Commission's order. Please confirm the areas where the purple Qwest/CenturyLink areas overlap with the non-rural zip code areas represent Boomerang's current South Dakota service area. Please explain any discrepancies and provide updated maps if necessary.

RESPONSE: Boomerang confirms that our Coverage Area is where the Qwest/CenturyLink (ILEC) service area (depicted as purple in the maps referenced in question 1-4) overlaps the non-rural zip codes.

Attachment-1, 'A-26d SD_DR-1.4, Att1, MAP-SD Current_Coverage_Area, Attachment1, 2023-11-04,' is a new map of our current coverage area using the data from FCC website. This map differs from the previous map: 1) the dotted lines of the previous map were based on zip code boundaries with the Qwest/CenturyLink service area shaded in purple; and 2) the new map uses redlines to define the service areas of the ILECs, of which Qwest/CenturyLink is blue, and the zip code area is shaded in orange.

Upon comparison of the two maps one anomaly appears in or around Aberdeen SD. The boundaries of zip code 57401 appear to have been modified (and/or possibly another zip code has been inserted) leaving a portion of the Qwest/CenturyLink service area no longer overlapped by zip code 57401. (See Boomerang Response to Data Request 12, Attachment 2-06, MAP-5 for previous coverage of 57401; and compare to Attachment 1 ('A-26d SD_DR-1.4, Att1, MAP-SD Current_Coverage_Area, Attachment1, 2023-11-04'.) Boomerang has no customers in this area. Though Qwest/CenturyLink is still the underlying carrier, the area is no longer covered by zip code 57401 and if there is a new zip code, it is not on our approved list. Thus, this area is not included in our service area.

- 1-5. Provide maps depicting the areas Boomerang is seeking to relinquish. Please overlay this map with the approved non-rural wire centers (Qwest/CenturyLink areas).

RESPONSE: See Boomerang's Proposed Relinquish Areas which are reflected in Attachment 2, 'A-26d SD_DR-1.5, Att2, MAP-SD Proposed_Relinquish_Areas, Attachment2, 2023-11-04.' Consistent with the formatting in the Attachment 1 map, the red outline in the SD Proposed Relinquish Areas map are the ILEC service area boundaries, of which the Qwest/CenturyLink areas are colored in blue; Boomerang's current coverage is the zip code area, colored orange, that overlaps the Qwest/CenturyLink service areas. Boomerang's proposed relinquished zip codes are reflected in pink. The proposed relinquished coverage areas are the zip code areas where Verizon is Boomerang's only underlying carrier within the zip code.

- 1-6. Provide updated maps of Boomerang's service area in South Dakota following relinquishment and T-Mobile's merger with the Sprint network. Please overlay this map with the approved non-rural wire centers (Qwest/CenturyLink areas).

RESPONSE: In South Dakota, T-Mobile's merger with the Sprint network mirrored Boomerang's Verizon non-rural service area with the exception of the Relinquishment Zip Codes. Attachment 3 reflects Boomerang's Revised Coverage Area, ('A-26d SD_DR-1.6, Att3, MAP-SD Revised_Coverage_Area, Attachment3, 2023-11-04') following relinquishment and T-Mobile's merger with the Sprint network. To reiterate, Boomerang's Coverage area is the Qwest/CenturyLink (ILEC) service area (non-rural) that are overlapped by the zip codes.

- 1-7. Provide maps showing each of the 14 impacted customer's location. Provide which options each customer has for continued service. Please overlay this map with the approved non-rural wire centers (Qwest/CenturyLink areas).

RESPONSE: Attachment 4 reflects the location of the 14-impacted subs within Revised Coverage Area of the map. The Revised Coverage Area includes the Current Coverage area that Boomerang will retain and will not include the relinquished areas. The green pins identify the locations where the subscribers reside. There are 3-impacted subscribers in or around the Rapid City area, 9-impacted subscribers in or around the Sioux Falls area, 1 subscriber in or around the Vermillion area, and 1 subscriber in or around the Yankton area. (See 'A-26d SD_DR-1.7, Att4, MAP-SD Impact Subs in Revised Coverage Area, Attachment4, 2023-11-04.')

- 1-8. Refer to Exhibit A. The Commission granted Boomerang ETC designation for the non-rural wire centers. Which non-rural wire centers will Boomerang continue to serve and which does Boomerang seek to relinquish?

RESPONSE: The responses in Attachments 5a and 5b are formatted consistent with Exhibit A of the Non-Rural Approval Order for (TC13-035).

See Attachment 5a ('A-26d SD_DR-1.8, Att5a, Bmg SD Revised Coverage Area WC List, Attachment5a, 2023-11-05') for the Revised Coverage Area Wire Center List that comprises the retained Wire Centers.

See Attachment 5b ('A-26d SD_DR-1.8, Att5b, SD WC to be Relinquished, Attachment5b, 2023-11-05') for the list of Wire Centers to be relinquished/withdrawn from Boomerang's Current Coverage Area.

- 1-9. Provide what authority allows relinquishment based on zip codes.

RESPONSE: Boomerang initially filed its partial relinquishment applications and petitions in approximately 30 states with zip codes for convenience to clearly delineate the areas affected by the pending withdrawal of Verizon Wireless coverage, which is defined by Verizon Wireless in zip code format, and to clearly identify which customers had the option to transfer to Boomerang's other underlying carrier T-Mobile within the same zip codes. In other words, the initial applications relied on the Zip Codes because the underlying carriers define their Service Areas using Zip Codes and because USAC tracks alternative ETC coverage by zip codes. See <https://cnm.universalservice.org/>

Boomerang remains committed to complying with each State's filing requirements, including South Dakota's submission of the coverage area by wire center as required by the Commission.

- 1-10. Refer to Exhibit C. Explain why Boomerang is currently serving in the following rural service territories: CRST Telephone Authority, Santel Communications, Venture Communications, James Valley Cooperative, and Western Telephone Company¹. If Boomerang is not currently serving in these service areas, explain why these ETCs are listed on Exhibit C.

RESPONSE: Boomerang is not serving in the rural services territories listed above. The list was put together using USAC's "Companies Near Me" tool to identify service providers within a 'Zip Code.' USAC's Tool focuses on Zip Code rather than ILEC or wire centers. Qwest/CenturyLink is the alternate service provider in each of the relinquished wire centers. There are two 'zip codes' that appear to have one alternate mobile service provider, Feelsafe Wireless by Airvoice (57028) and Centex (57067), per USAC's Companies Near Me" tool.

- 1-11. Is Boomerang currently serving any customers in any rural areas in South Dakota? If so, provide the number of customers, identify the service area(s), and explain why Boomerang is serving these customers given the Commission's order in Docket TC13-035 designating Boomerang as an ETC in non-rural areas.

RESPONSE: No, Boomerang is not serving any customers located in rural areas in South Dakota.

- 1-12. Pursuant to ARSD 20:10:32:48(1), please confirm Boomerang provided a copy of the petition to each local service provider serving the area for which Boomerang seeks to relinquish its eligible telecommunications carrier designation. If not, please explain.

RESPONSE: Service providers in the proposed relinquishment areas have been noticed as detailed in the attached service list. See Attachment 6 ('A-26d SD_DR-1.12, Att6, Svc List to Svc Providers in Relinq Zips, 2023-12-04').

- 1-13. How many customers does Boomerang currently serve in South Dakota?

RESPONSE: 42 subscribers in South Dakota, of which only 14 received services via the Verizon network.

¹ Note that in Docket TC14-087, the Commission approved Venture Communications Cooperative's application to Amend its Certificate of Authority to offer local exchange services to the former customer of Western Telephone Company as Western Telephone Company merged with and into Venture Communications Cooperative Company