

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

APPLICATION OF BOOMERANG)	
WIRELESS, LLC FOR DESIGNATION AS)	
AN ELIGIBLE TELECOMMUNICATIONS)	Docket No. TC13-035
CARRIER ON A WIRELESS BASIS (LOW-)	
INCOME ONLY)	
)	

PREFILED DIRECT TESTIMONY OF KIMBERLEY LEHRMAN

1 Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

2 A. My name is Kimberley Lehrman. My business address is 955 Kacena Road, Suite A,
3 Hiawatha, IA 52233.

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5 Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

6 A. I am testifying on behalf of Boomerang Wireless, LLC d/b/a enTouch Wireless
7 (“Boomerang” or the “Company”), the applicant in this proceeding.

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9 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

10 A. I am submitting additional testimony in support of the Application (“Application”)
11 whereby Boomerang is seeking designation as a wireless Eligible Telecommunications
12 Carrier (“ETC”) in the non-rural Service Area within the State of South Dakota.
13 Specifically, I am providing this testimony to demonstrate why designation of
14 Boomerang as and ETC serves and will serve the public interest.

15
16 Q. WHAT IS YOUR CURRENT POSITION AT BOOMERANG?

1 A. I am President of the Company.

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3 Q. HAVE YOU REVIEWED THE APPLICATION AND OTHER DOCUMENTS FILED
4 BY BOOMERANG IN THIS PROCEEDING?

5 A. Yes.

6 Q. DO YOU ADOPT THE APPLICATION AS FILED?

7 A. Yes, including the demonstration of the public interest as set forth in the Application.

8 Q. DOES BOOMERANG HOLD ANY OTHER AUTHORITY FROM THE SOUTH
9 DAKOTA PUBLIC UTILITIES COMMISSION (“COMMISSION”)?

10 A. No, but Boomerang is anxious to receive designation as an ETC in South Dakota.
11 Boomerang was previously designated by the Federal Communications Commission
12 (“FCC”) as a Lifeline Broadband Provider ETC, and Boomerang is presently serving
13 approximately 1,741 wireless Lifeline customers in South Dakota. Each of these
14 customers is currently receiving Lifeline service meeting the FCC’s minimum service
15 standards.

16

17 Q. WHAT IS THE NATURE OF BOOMERANG’S REQUEST?

18 A. Boomerang requests designation as a wireless ETC in the State of South Dakota for
19 participation in the Federal Universal Service Lifeline program (Low Income only) to
20 serve qualifying South Dakota residents, so that Boomerang can continue to service
21 approximately 1,466 non-rural customers of the 1,741 customers in South Dakota
22 currently receiving Lifeline service through Boomerang’s designation as an LBP. In
23 addition, Boomerang seeks approval of its Lifeline service plans.

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Q. WHAT IS THE AREA IN WHICH BOOMERANG REQUESTS DESIGNATION AS AN ETC?

A. Through this Application, Boomerang is requesting designation only throughout the non-rural Service Area of the State of South Dakota. Boomerang plans to offer Lifeline service in all non-rural service areas in South Dakota that are served by its underlying carriers Sprint, Verizon, and T-Mobile; and therefore, Boomerang requests designation in all non-rural exchanges to the extent that Boomerang’s underlying carriers have facilities and coverage. More specifically, Boomerang has previously submitted a set of zip codes, wire centers, and detailed maps describing the requested Service Area, and Boomerang requests designation in the specified non-rural Service Area.

Q: DESCRIBE BOOMERANG’S LIFELINE SERVICE PLANS.

Boomerang will offer qualified consumers a choice of either of Boomerang’s Lifeline Service Plans. Eligible non-tribal Lifeline customers who reside in Boomerang’s designated Service Area in South Dakota will be provided one of two optional Lifeline plans: a) the Voice Minimum Standard Plan; or b) the Broadband Minimum Standard Plan.

The Voice Minimum Standard Plan is the **500 Minute Plan** that offers 500 voice minutes, 100 texts, and 10MB of data per month. Each customer must either provide his or her own device, or receive a Company-provided data-enabled smartphone for a minimal charge. There are no discounts or promotions for devices available with this plan. Lifeline minutes, texts and data are automatically posted each month on the Lifeline customer’s service date. There is no rollover of minutes, texts, or data, and any

1 unused minutes, texts, or data will expire on the next month's monthly service date. All
2 usage is subject to the Acceptable Use Policy. .

3 The Broadband Minimum Standard Plan is the **500 MB Plan**: This plan offers 500 MB
4 of data and 100 talk & text units per month. Data is 3G/4G based on network
5 availability and device capability. Each customer must either provide his or her own
6 device, or receive a Company-provided data-enabled smartphone for a minimal charge.
7 Lifeline data, units, minutes, and texts are automatically posted each month on the
8 Lifeline customer's service date. There is no rollover of data, units, minutes, or texts,
9 and any unused data, units, minutes, or texts will expire on the next month's monthly
10 service date. All usage is subject to the Acceptable Use Policy.

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12 Q. DOES BOOMERANG HAVE ETC DESIGNATION IN ANY OTHER
13 JURISDICTION?

14 A. Yes. The Company has been granted ETC designation in 31 States: Arizona, Arkansas,
15 California, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky,
16 Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada,
17 North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina,
18 Texas, Washington, West Virginia, Wisconsin, and Wyoming. In addition, Boomerang
19 has been designated as an ETC in the U. S. Territory of Puerto Rico. Boomerang also has
20 applications pending in several jurisdictions for designation as an ETC on a wireless
21 basis for federal support for Lifeline services. Boomerang has never been denied ETC
22 designation by any state commission or by the FCC in connection with any state.

1 Q. HOW WILL BOOMERANG'S DESIGNATION AS AN ETC SERVE THE PUBLIC
2 INTEREST OF SOUTH DAKOTA?

3 A. Designating Boomerang as an ETC throughout its service area will make Lifeline
4 discounts available to more South Dakota residents. This provision of Lifeline discounts
5 is particularly valuable to low-income customers in the wireless field, where, to
6 Boomerang's knowledge, there are a limited number of wireless providers offering USF
7 supported service and even fewer offering the same with absolutely no monthly recurring
8 charge to the end-user. As such, the service for which Boomerang seeks ETC status is
9 unique.

10 Designation of Boomerang as an ETC for purposes of offering the Lifeline program will
11 serve the public interest by increasing participation of qualified consumers in those
12 programs, thereby contributing to an overall increase in the number of South Dakota
13 residents receiving Lifeline service and an increase in the amount of federal USF dollars
14 benefitting South Dakota residents.

15 Designation of Boomerang will also serve the public interest by furthering the extensive
16 role that Boomerang believes it will play in the provision of communications service to
17 low-income consumers, transient users, and other consumers who, due to restrictive
18 credit criteria, deposit requirements, and long-term commitments of traditional service
19 providers, are off network and, without any viable alternative, are likely to remain so.

20 Finally, designation of Boomerang as a non-rural ETC will ensure that approximately
21 84% of the 1,741 South Dakota customers currently receiving Lifeline service from
22 Boomerang will continue to receive these services uninterrupted beyond June 1, 2017.

1 Q: HOW CAN BOOMERANG ENSURE IT WILL NOT OFFER SERVICE OUTSIDE
2 THE DESIGNATED NON-RURAL SERVICE AREA?

3 A: Boomerang has previously submitted its confidential Geo-Location process whereby
4 Boomerang is able to confirm that a prospective customer resides within Boomerang's
5 deisgnated Service Area. Use of these processes will serve the public interest in South
6 Dakota.

7 Q: WHAT ABOUT THE FORMER BUDGET CUSTOMERS WHO WERE SERVED BY
8 BOOMERANG AS AN LBP, BUT WOULD FALL OUTSIDE BOOMERANG'S
9 REQUESTED NON-RURAL SERVICE AREA?

10 A: Unless the Commission grants a specific approval to serve these rural customers, the
11 customers will be de-enrolled by or before June 2, 2017. The Commission could in its
12 Order authorize Boomerang to temporarily continue serving these rural customers.

13 Q: IS BOOMERANG SEEKING DESIGNATION IN RURAL AND/OR TRIBAL AREAS
14 AT THIS TIME?

15 A: Although Boomerang is not seeking designation in rural and/or tribal areas through this
16 particular Application, Boomerang does have a pending request for ETC designation in
17 certain South Dakota tribal areas in Docket No. TC-15-002.

18

19 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

20 A. Yes.

VERIFICATION

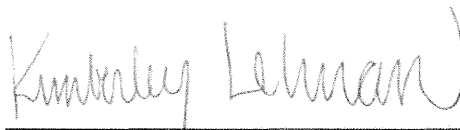
STATE OF IOWA

COUNTY OF LINN

I, the undersigned KIMBERLEY LEHRMAN, do hereby state as follows:

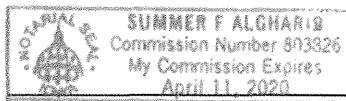
1. I serve as President of Boomerang Wireless, LLC d/b/a enTouch Wireless ("Boomerang"). My business address is 955 Kacena Road, Suite A, Hiawatha, Iowa 52233.
2. I have reviewed and am submitting the foregoing Prefiled Direct Testimony on behalf of Boomerang Wireless, LLC d/b/a enTouch Wireless, and based on my personal knowledge, the Prefiled Direct Testimony is accurate and complete.
3. I have full authority to submit this Prefiled Direct Testimony on behalf of Boomerang.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



KIMBERLEY LEHRMAN, President
Boomerang Wireless, LLC

SWORN TO AND SUBSCRIBED before me on this the 25th day of
April, 2017.



Notary Public

My Commission Expires:

April 11, 2020