Docket Number:TC16-001Subject Matter:Sixth Data RequestRequest to:IM Telecom, LLC dba Infiniti MobileRequest from:South Dakota Public Utilities Commission StaffDate of Request:January 26, 2017Responses Due:February 8, 2017

6-2. In response to Data Request 5-8, the company says that it will "possibly" use zip +4 geocoding. What does the company currently use to ensure that a customer is in the appropriate service territory?

**Response to 6-2:** Infiniti Mobile currently operates through the CGM, LLC application platform, which sets ZIP code parameters on its behalf through Infiniti Mobile's service footprint, ensuring that all Lifeline enrollees and customers are in the appropriate service territory—as established in a designating order, including limitations with respect to rural service providers. Infiniti Mobile will coordinate with CGM to ensure service is not offered to customers residing in the geographic footprint of any rural carrier in South Dakota upon launch of service. Moreover, other jurisdictions do not require the use of "zip +4 geocoding," but given the demonstrated overlap of Infiniti Mobile's proposed service area with rural carriers in South Dakota, the level of detail needed to clarify service area is more precise and therefore may likely require zip +4 geocoding, which the company is willing to use even though it is an added expense.