

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

In the Matter of the Petition of)	
North American Local, LLC for)	Docket No. TC19-009
Designation as an Eligible Telecommunications)	
Carrier in the State of South Dakota)	

**North American Local, LLC
Supplemental Responses To Discovery Requests
of the South Dakota Telecommunications Association (“SDTA”)**

North American Local, LLC (“North American”) hereby submits these supplemental responses to the Discovery Requests of the South Dakota Telecommunications Association (“SDTA”).¹ The following responses correspond to the numbered Interrogatories 1 through 12 in SDTA’s Discovery Requests:

Interrogatory 1 Response:

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Interrogatory 2 Response:

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At this time, no documents have been reviewed for Jorge Bellas’ testimony, except North American’s ETC application filed in this proceeding and the responses to discovery requests.

¹ On August 21, 2020, North American submitted its initial responses to the discovery requests of the SDTA.

Interrogatory 3a Response: North American is a facilities-based wireless reseller with its own network and back office facilities that relies on the wireless spectrum, cell towers and radio equipment of the large nationwide wireless carriers, like AT&T, Verizon, and T-Mobile.

Interrogatory 3b Response: See Response to Interrogatory 3a.

Interrogatory 3c Response: North American intends to serve all residents of the Tribal lands included in its request for ETC designation. Any potential customer is not satisfied with North American's coverage and service availability will have the ability to cancel service at no charge.

Interrogatory 3d Response: See Response to Interrogatory 3a. North American has agreements with AT&T, Verizon, and T-Mobile to resell services.

Interrogatory 4a Response: As a reseller of other facilities-based carriers' services, North American is able to provide consumers with the optimum coverage depending upon the underlying carrier's coverage and services that best meet customers' needs.

Interrogatory 4b Response: It is North American's understanding that ARSD § 20:10:32:43.01 is applicable to ETC applicants seeking high cost support used to extend network facilities to unserved areas. North American is seeking only Lifeline support to provide discounted service to qualified low-income consumers.

Interrogatory 5 Response: Upon ETC designation, North American will immediately make available Lifeline service to qualified low-income consumers throughout its ETC service area, subject to any applicable regulatory requirements or conditions of ETC designation.

Interrogatory 6 Response (Updated): See North American’s updated web site at <https://www.northamericanlocal.com/sign-upalternate>, which is summarized below.

Rate Plan	Features	Retail Cost	Non-Tribal Cost	Tribal Cost
Choice Mobile Unlimited	1000 Talk, 500 Text	\$7.25	\$0.00	\$0.00
Choice Mobile Unlimited	Unlimited Talk, Unlimited Text	\$32.25	\$25.00	\$0.00
Choice Mobile Unlimited 1GB	Unlimited Talk, Unlimited Text, 1GB	\$47.25	\$40.00	\$15.00
Choice Mobile Unlimited 3GB	Unlimited Talk, Unlimited Text, 3GB	\$59.25	\$50.00	\$25.00
Choice Mobile Unlimited 5GB	Unlimited Talk, Unlimited Text, 5GB	\$69.25	\$60.00	\$35.00
Choice Mobile Unlimited 10GB	Unlimited Talk, Unlimited Text, 10GB	\$89.25	\$80.00	\$55.00
Choice Home Unlimited	Unlimited Local and Long Distance	\$59.25	\$50.00	\$25.00

Interrogatory 7 Response: North American’s Lifeline service offerings will meet all applicable regulatory requirements, including the minimum service standards established by the Federal Communications Commission (“FCC”).

Interrogatory 8 Response: The minimum monthly data usage standard established in 47 C.F.R. § 54.408 is an evolving standard set periodically by the FCC. North American meets this standard in its Lifeline service markets and will continue to meet this standard in South Dakota and all other Lifeline markets.

Interrogatories 9 (Updated):

Interrogatory 9a Response: North American currently has approximately 5,000 prepaid wireless subscribers.

Interrogatory 9b Response: Of the approximately 5,000 prepaid wireless subscribers of North American, 75% are on Lifeline rate plans and 25% are on non-Lifeline rate plans.

Interrogatory 9c Response: Of all of North American’s Lifeline subscribers, approximately 80% are Tribal Lifeline subscribers.

Interrogatory 9d Response: All rate plans are available to non-Lifeline subscribers without the Lifeline discount.

Interrogatory 9e Response: See previous responses.

Interrogatory 10 Response (Updated):

Interrogatory 10a Response: Service guard is defined on the web site as follows: “If your phone is not used within a 45-day period, your account will be moved to our protection plan with a cost of only \$0.50! Once you use your device after the 45-day non-usage period, your account will revert back to its previous plan and be billed at its normal rate.” Service Guard protection does not impact the non-usage requirement in FCC Rule 54.407(c)(2), which North American remains in compliance with at all times.

Interrogatory 10b Response: See response to Interrogatory 6. North American offers rates plans with up to 10 GB of data usage.

Interrogatory 10c Response: North American offers additional data usage purchase options as follows:

500MB	\$10.00
1GB	\$20.00
2GB	\$30.00
3GB	\$40.00

Interrogatory 10d Response: North American offers additional voice minutes purchase options as follows:

100 Minutes	\$4.99
200 Minutes	\$9.98
300 Minutes	\$14.97
400 Minutes	\$19.96

Interrogatory 10e Response: North American does not offer roll-over voice minutes or data.

Interrogatory 10f Response: North American’s Lifeline rate plans include free smartphones.

Interrogatory 10g Response: North American provides only smartphones and devices with Wi-Fi and hotspot capability. The ZTE Blade Vantage and Kyrocera Duraforce are the devices currently offered to all subscribers.

Interrogatory 10h Response: All Lifeline subscribers (Tribal and non-Tribal) are eligible to receive a free smartphone device. Approximately 25 percent of non-Lifeline subscribers purchased one or more of North American's phones or devices.

Interrogatories 11 Response (Updated):

Interrogatory 11a Response: Approximately 2% of prepaid wireless subscribers purchase additional data services not included in their rate plans.

Interrogatory 11b Response: Approximately 4% of Lifeline wireless subscribers purchase additional data services not included in their rate plans.

Interrogatories 12 Response (Updated):

Interrogatory 12a Response: Total gross revenue for prepaid wireless services (non-Lifeline) in 2018 was \$598,000.

Interrogatory 12b Response: Total gross revenue for Lifeline (non-Tribal) wireless service in 2018 was \$503,000.

Interrogatory 12c Response: Total gross revenue for Tribal Lifeline wireless service in 2018 was \$1,867,000.

Interrogatory 12d Response: The average monthly gross revenue per subscriber is based upon the applicable rate plan identified in response to interrogatory 6.

Interrogatory 12(e) Response: The total disbursement from the federal Lifeline program made to North American in 2018 is identified in the USAC disbursement tool found at <https://apps.usac.org/li/tools/disbursements/default.aspx>, which provides an updated view of Lifeline disbursements to North American by USAC.

Dated: August 28, 2020

Respectfully submitted,

North American Local, LLC

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Certificate of Service

I hereby certify that a copy of these Supplemental Responses To SDTA's Discovery Requests was filed with the South Dakota Public Utilities Commission and served on the following individuals by email on August 28, 2020:

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