

Docket Number: TC24-003
Subject Matter: Second Data Request
Request to: IM Telecom, LLC dba Infiniti Mobile (Infiniti)
Request from: South Dakota Public Utilities Commission Staff
Date of Request: May 28, 2024
Responses Due: June 11, 2024 (extended to June 25, 2024)

- 2-1. Provide a list of the CenturyLink wire centers Infiniti is requesting to serve.
Response: Comparing wire centers to wireless coverage (which is zip-code based) is like comparing apples to oranges. Neighbors on the same street could be within a CenturyLink wireline rate center or outside of it. The Company would likely need to use Geocoding which would require monetary investment as well as time for vetting and implementing a robust solution. Therefore, Infiniti proposes to limit the service area at this time to the list of attached zip codes which, to the best of the Company's knowledge, are wholly located within CenturyLink's service area. The primary wire centers associated with each zip code are included.
- 2-2. Provide a map, by wire center, of the CenturyLink areas Infiniti is requesting to serve, consistent with the list provided in response to question 2-1. Shade the areas Infiniti requests to serve in a different color than the rural areas Infiniti will not serve per the Stipulation with SDTA. In addition, please include an outline of the tribal area boundaries.
Response: Infiniti does not at this time have the ability to generate such a map. However, Infiniti proposes to define the requested service area to only those zip codes wholly located within CenturyLink service areas, and understands that such list would be subject to review by the South Dakota Telecommunications Association ("SDTA") to ensure SDTA service areas are indeed excluded.
- 2-3. Explain how the Company will ensure customers are located in CenturyLink areas.
Response: By limiting the service area to only zip codes wholly within CenturyLink areas, the Company will ensure customers are located in CenturyLink areas. Infiniti generated the attached zip code list using data from the LERG, but also input each zip code in the interactive map below to ensure it was located within CenturyLink's service area.

<https://sdbit.maps.arcgis.com/apps/webappviewer/index.html?id=73648b1b111b4d81b71e71fd49c295>
- 2-4. Explain how the Company will ensure tribal customers are located in CenturyLink areas, since some tribal lands extend into rural areas.
Response: USAC determines tribal Lifeline eligibility and also limits enrollments to subscribers within the Company's approved ETC service area (which in this case, would be the list of zip codes wholly within CenturyLink areas), therefore any customers, including tribal, approved by USAC through the National Verifier would be located within CenturyLink areas.

2-5. Will Infiniti be utilizing zip codes when enrolling customers? If so, please provide a list of zip codes Infiniti intends to serve and provide a map overlaying the zip codes with the map provided in response to question 2-2. In addition, explain how the Company will distinguish customers in rural and non-rural areas to ensure Infiniti only enrolls customers in non-rural areas.

Response: See responses to 1 and 2 above. Infiniti does not have the ability to generate the requested map at this time, but has confirmed to the best of the Company's knowledge – in part using the interactive map referenced in response to No. 3 above – that the proposed zip codes are located within non-rural areas.

2-6. Refer to Infiniti's response to Staff Data Requests 1-29, 1-14, and 1-15. Exhibits 1-14 and 1-15 provide Lifeline and ACP customer information. Are the non-lifeline revenues provided in Exhibit 1-29 ACP revenues only? With the expiration of the ACP funding, will the Company solely rely on Lifeline funding to operate? If not, provide Infiniti's other sources of revenue.

Response: Infiniti is a traditional prepaid MVNO, and the ACP and Lifeline programs provide discounts to consumers on services which they would otherwise have to fully pay for. Non-Lifeline revenues do not contain ACP revenues only. Other sources of unsubsidized revenue include prepaid wireless plans, top-up payments and device sales. Infiniti does not rely solely on Lifeline funding to operate. Infiniti revenues are consolidated into our parent company, KonaTel. With that, other sources of revenues from our affiliate, Apeiron, include those generated by CLEC and CPaaS product sets. While the KonaTel entities each spend primary focus on their respective business units, they still share common resources whether operationally or financially thereby not relying solely on Lifeline funding to operate.

2-7. Refer to DR 1-30 in which Infiniti states it "does not anticipate geographic areas in South Dakota wherein customers may experience service issues due to inadequate coverage by the underlying carriers." On page 17 of the Petition, Infiniti asks for a waiver of ARSD 20:10:32:43:01(2), which requires ETCs to make modifications to network facilities to provide service within a reasonable period of time if the potential customer is within the applicant's service area but outside its existing network coverage and service can be provided at a reasonable cost. If Infiniti does not anticipate inadequate coverage in any areas, explain why a waiver of ARSD 20:10:32:43.01(2) is necessary.

Response: As a reseller, Infiniti would be unable to make modifications to network facilities as required by ARSD 20:10:32:43:01(2), should the need ever arise - hence the waiver request.

2-8. Per ARSD 20:10:32:43(2), provide the proposed effective date of designation of ETC status.

Response: June 24, 2024 or as soon as possible thereafter.

Zip Code	Rate Center	City	County
57013	CANTON	Canton	Lincoln County
57017	BROOKINGS	Colman	Moody County
57025	ELK POINT	Elk Point	Union County
57028	FLANDREAU	Flandreau	Moody County
57032	HARISBGTEA	Harrisburg	Lincoln County
57069	VERMILLION	Vermillion	Clay County
57071	VOLGA	Volga	Brookings County
57078	YANKTON	Yankton	Yankton County
57103	SIOUX FLS	Sioux Falls	Minnehaha County
57105	SIOUX FLS	Sioux Falls	Minnehaha County
57106	SIOUX FLS	Sioux Falls	Minnehaha County
57108	SIOUX FLS	Sioux Falls	Lincoln County
57110	SIOUX FLS	Sioux Falls	Minnehaha County
57212	ARLINGTON	Arlington	Kingsbury County
57216	BIGSTONECY	Big Stone City	Grant County
57231	DE SMET	De Smet	Kingsbury County
57233	WATERTOWN	Erwin	Kingsbury County
57249	LK PRESTON	Lake Preston	Kingsbury County
57252	MILBANK	Milbank	Grant County
57301	MITCHELL	Mitchell	Davison County
57324	CAVOUR	Cavour	Beadle County
57325	CHAMBERLAN	Chamberlain	Brule County
57350	HURON	Huron	Beadle County
57353	IROQUOIS	Iroquois	Kingsbury County
57362	MILLER	Miller	Hand County
57469	REDFIELD	Redfield	Spink County
57501	PIERRE	Pierre	Hughes County
57532	PIERRE	Fort Pierre	Stanley County
57572	VALENTINE	Saint Francis	Todd County
57641	MCINTOSH	McIntosh	Corson County
57645	MCINTOSH	Morristown	Corson County
57656	TIMBERLAKE	Timber Lake	Dewey County
57701	RAPID CITY	Rapid City	Pennington County
57703	RAPID CITY	Rapid City	Pennington County
57706	RAPID CITY	Ellsworth Afb	Meade County
57717	BELLEFORCH	Belle Fourche	Butte County
57718	RAPID CITY	Black Hawk	Meade County
57719	RAPID CITY	Box Elder	Meade County
57732	RAPID CITY	Deadwood	Lawrence County
57745	HILL CITY	Hill City	Pennington County
57754	RAPID CITY	Lead	Lawrence County
57783	SPEARFISH	Spearfish	Lawrence County
57785	STURGIS	Sturgis	Meade County
57793	SPEARFISH	Whitewood	Lawrence County