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

**IN THE MATTER OF THE FILING OF
TRACFONE WIRELESS, INC.'S
PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF SOUTH
DAKOTA FOR THE LIMITED
PURPOSE OF PROVIDING LIFELINE
SERVICE TO QUALIFYING
CUSTOMERS**

Docket No. TC24-005

**TRACFONE WIRELESS, INC.'S RESPONSE TO SECOND DATA REQUEST OF
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION STAFF**

TracFone Wireless, Inc. (TracFone) provides the following response to the second data request of the South Dakota Public Utilities Commission (Commission) Staff issued on January 10, 2025.

Dated: February 10, 2025

RESPONSE TO SECOND DATA REQUEST

- 2-1. Refer to the response to DR1-6, explain how Tracfone will ensure customers are not in the rural areas when the only map submitted is a statewide map, but Tracfone entered a stipulation with SDTA to not provide service in rural areas.**

Response

The stipulation entered by TracFone and South Dakota Telecommunications Association (SDTA) provides in the Agreement section: “The Parties agree any ETC designation to result from this docket shall be limited to South Dakota CenturyLink wire centers and shall not extend into any rural service area served by an SDTA member company.” In SDTA’s response to the Commission Staff’s First Data Request, filed with the Commission on January 23, 2025, SDTA asserts that the stipulation addressed all rural areas, not only rural areas served by SDTA members. However, the clear language of the stipulation is limited to rural service areas served by an SDTA member company and SDTA is the only other party to the stipulation. Nevertheless, TracFone clarifies that it is only seeking designation as an ETC in CenturyLink wire centers. A list of the wire centers where TracFone seeks ETC designation and the primary zip code associated with each wire center is provided as Exhibit 2-1. A map depicting the wire centers is included with Exhibit 2-1.

TracFone will ensure that it is not serving customers outside of the CenturyLink wire centers by excluding Lifeline applicants residing in zip codes that are not associated with those wire centers. If a Lifeline applicant’s address is located in a zip code associated with a CenturyLink wire center, then TracFone will check that the street address is within its designated service area by using location software or checking the interactive coverage area map on the Commission’s website available at

<https://sdbit.maps.arcgis.com/apps/webappviewer/index.html?id=73648b1b111b4d81b71e71fd49c295>.

2-2. Refer to the response to DR 1-13:

- a) The link is not working for Staff to review. Explain how Tracfone can ensure customers are not in a rural area if you don't have your own map.**
- b) Explain, in detail, why Tracfone cannot provide its own wire center map.**
- c) Refer to exhibit 5 attached to DR1. This exhibit contains numerous rural telecom companies. Explain why rural telecom companies are included when the stipulation with SDTA limits the application to CenturyLink wire centers only.**
- d) Without a detailed map showing only your requested service area by wire center, explain how Tracfone is in compliance with ARSD 20:10:32:43(3).**

Response

- a) See Exhibit 2-1 for a list of wire centers and zip codes and a map describing TracFone's proposed ETC service area. Regarding the link provided in response to DR 1-13, TracFone refers the Commission Staff to the link provided in response to DR 2-1. As of the date of this response, the link is working.
- b) TracFone, as a wireless carrier, defines its service area by zip codes that are within the coverage of its wireless signals. In contrast, wireline carriers define their service areas based on the physical location of wire centers with each wire center having distinct boundaries. TracFone does not have access to the data necessary to generate its own wire center map. Therefore, TracFone relies on the wire center map available on the Commission's website at the link provided in response to DR 2-1.
- c) See Exhibit 2-1 for a description of TracFone's requested service area.

d) Exhibit 2-1 identifies the service area for which designation is sought by providing a list of wire centers and zip codes and a detailed map. Thus, TracFone meets ARSD 20:10:32:43(3).

2-3. Are Tracfone employees, subcontractors, etc. paid based on enrollments or any type of commission for signing people up?

Response

No.

2-4. Refer to the response to DR1-43 and the coverage map filed with the Petition. The western part of the state showing non-red colors is included in CenturyLink areas. Explain how Tracfone plans to serve these areas that the Verizon coverage map is showing could be problematic.

Response

See response to DR 2-1 for a description of TracFone's requested service area.

2-5. Will Tracfone file information with the SD PUC when changes to Lifeline plans are made? Provide any FCC rule that requires these types of filings.

Response

TracFone is not aware of a South Dakota statute or regulation that requires an ETC to file information when changes to Lifeline plans are made. TracFone is also not aware of any ETCs subject to such a requirement as a condition for designation. There are no FCC rules that require ETCs to file information about their Lifeline plans after designation.