

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

**APPLICATION OF ASSURANCE)
WIRELESS USA, L.P., FOR)
DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER)
FOR THE PURPOSE OF OFFERING)
LIFELINE SERVICE TO QUALIFYING)
CUSTOMERS)**

Docket No. TC24-002

**ASSURANCE WIRELESS' SUPPLEMENTAL RESPONSES TO
STAFF'S DATA REQUESTS**

Request to: Assurance Wireless USA, L.P.
Request from: South Dakota Public Utilities Commission Staff

1-2. Provide a map, by wire center, of the area Assurance is requesting to serve.

Response: Assurance Wireless requests designation as an ETC in South Dakota in a service area that is equivalent to its current wireless coverage area in South Dakota (including as that coverage area may change going forward), but not in Tribal lands. Attachment 1, filed herewith, shows Assurance Wireless's coverage superimposed on a map of the wire centers within South Dakota. The colored areas shown on Attachment 1, denoting Assurance Wireless's coverage, are equivalent to its requested ETC service area.

Supplemental Response (April 18, 2024): See Supplemental Response to Staff DR 1-2. That supplemental response shows Assurance Wireless' proposed ETC service area by zip code, not wire center, but is a clearer and more accurate representation of Assurance Wireless proposed Lifeline-only ETC service area.

2-1. Refer to the response to DR1-2. Attachment 1 to DR 1-2 shows all wire centers and the coverage for the entire state. Provide a map that clearly shows the specific wire centers Assurance is requesting ETC for within the wireless coverage area map that has already been provided.

Response: As context for Assurance Wireless' response, it is important to note that it is not necessary for Assurance Wireless' proposed ETC service area in South Dakota to conform to or be defined by the boundaries of specific wire centers.¹ As explained in Assurance Wireless'

¹ See *In the Matter of Telecommunications Carriers Eligible for Support, Lifeline and Link Up Reform*, WC Docket Nos. 09-197 and 11-42, *Memorandum Opinion and Order*, FCC 13-44 (rel. April 15, 2013), ¶ 11

Petition and its response to Staff DR 1-2, Assurance Wireless' proposed ETC service area is as follows: its current wireless coverage area in South Dakota (including as that coverage area may change going forward), but not in Tribal lands. In other words, Assurance Wireless' proposed ETC service area is everywhere that is colored magenta on Attachment 1 to Staff DR 1-2, minus any Tribal lands. The wire centers that overlap with that service area were intended to be shown on Attachment 1 to Staff DR 1-2, and to be identified on Exhibit 4 to Assurance Wireless' Petition.

In the course of communications with Commission Staff, Assurance Wireless became aware of a technical error causing some of the information in Attachment 1 to Staff DR 1-2 and on Exhibit 4 to Assurance Wireless' Petition to be incomplete. Assurance Wireless plans to soon submit a supplemental response that provides a clearer visual of Assurance Wireless' proposed ETC service area, with Tribal lands shown. Assurance Wireless also plans to soon submit an updated version of Exhibit 4 to Assurance Wireless' Petition listing all the South Dakota wire centers that are included in Assurance Wireless' proposed ETC service area.

Supplemental Response (April 18, 2024): Assurance Wireless has learned that the technical error referred to in the original response was caused by inadequate data provided by Assurance Wireless' mapping vendor. That vendor, which is known as Precisely, does not have reliable data identifying wire center boundaries in South Dakota. To provide a clear and authoritative identification of the areas in South Dakota where it seeks designation as a Lifeline-only ETC, Assurance Wireless proposes to use zip codes instead of wire center boundaries. Zip codes are easily ascertainable by all stakeholders; in particular, consumers know the zip code in which they live. Attached is an updated service area map (Attachment 1A to Staff DR 2-1), identifying the zip codes in South Dakota in which Assurance Wireless seeks designation. Also submitted herewith is a list of those zip codes; this list should be considered a replacement for Exhibit 4 to Assurance Wireless' Petition.

(forbearing from application of "service area" requirement in 47 U.S.C. § 214(e)(5) and 47 C.F.R. § 54.207(b)).

VERIFICATION

I, Robert Stanchina, am Senior Director for Assurance Wireless USA, L.P. (“Assurance”) and I hereby state that the facts set forth in the foregoing supplemental responses of Assurance to Staff’s Data Requests are true and correct to the best of my knowledge, information, and belief.

Robert Stanchina

Robert Stanchina
Senior Director, Assurance Wireless USA, L.P.