

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

**APPLICATION OF ASSURANCE)
WIRELESS USA, L.P., TO EXPAND ITS)
ELIGIBLE TELECOMMUNICATIONS)
CARRIER DESIGNATED SERVICE)
AREA TO INCLUDE TRIBAL LANDS)**

Docket No. TC25-003

SUBMISSION OF DOCUMENTS FROM DOCKET NO. TC24-002

The May 9, 2025 Petition filed by Assurance Wireless USA, L.P. (“Assurance Wireless” or “Company”) in Docket No. TC25-003 refers to and builds on the ETC designation granted by the South Dakota Public Utilities Commission (“Commission”) to Assurance Wireless in the Commission’s May 15, 2024 Order in Docket No. TC24-002 (the “2024 Designation Order”).¹ In order to ensure that the 2024 Designation Order and certain documents supporting it, originally filed in Docket No. TC24-002, are part of the record in this proceeding, Assurance Wireless hereby files those documents with the Commission.² In some instances, information from Docket No. TC24-002 is obsolete. In those instances, Assurance Wireless hereby files and submits updated information. Assurance Wireless also confirms that the information it filed in Docket No. TC24-002, as updated in this submission, remains correct in all material respects.

¹ *In the Matter of the Petition 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, *Order Approving Joint Stipulation; Order Granting Petition for Designation as an Eligible Telecommunications Carrier* (May 15, 2024).

² Assurance Wireless thanks Commission Staff Attorney Amanda Reiss and Staff Analyst Joseph Rezac for their suggestion to ensure that the docket in this matter is complete by filing the documents from Docket No. TC24-002.

I. DOCUMENTS FROM DOCKET NO. TC 24-002

The documents from Docket No. TC 24-002 that are being filed herewith are listed below.

Attachment	Name	Confidential?
A	Assurance Wireless' January 12, 2024 Petition for Designation as an Eligible Telecommunications Carrier for the Purpose of Offering Lifeline Service to Qualifying Customers, with Exhibits: ³	
B	Exhibit 2 (Sample Advertising)	
C	Exhibit 3 (Coverage)	
D	Exhibit 5 (Business Continuity)	
E	Assurance Wireless' February 22, 2024 Responses to Staff's First Set of Data Requests, with Attachments: ⁴	
F	Revised Exhibit 1 to January 12, 2024 Petition	
G	Attachment 4 (Confidential Response to DR1-27)	Y
H	Assurance Wireless' March 5, 2024 Responses to Staff's Second Set of Data Requests, with Attachments: ⁵	
I	Attachment 7 (Confidential Response to DR2-8)	Y
J	Assurance Wireless' April 8, 2024 Responses to Staff's Third Set of Data Requests	
K	Assurance Wireless' April 18, 2024 Supplemental Responses to Staff's Data Requests, with Attachments	
L	Attachment 1A (Map of Requested ETC Service Area)	
M	Revised Exhibit 4 (List of Service Area Zip Codes)	
N	Assurance Wireless' April 24, 2024 Letter regarding Clarification	
O	Staff's May 1, 2024 Memorandum	
P	Assurance Wireless' May 6, 2024 Response to the Comments of SDTA	
Q	Commission's May 15, 2024 Order Approving Joint Stipulation and Granting Petition for Designation as an Eligible Telecommunications Carrier	

³ Exhibit 1 to the January 12, 2024 Petition contained a clerical error and was replaced by a Revised Exhibit 1, submitted on February 22, 2024. Exhibit 4 was replaced by Revised Exhibit 4, submitted on April 18, 2024. Exhibits 6 and 7 are obsolete and more current versions are filed herewith. Exhibit 8 contained a reference to T-Mobile's 2023 10-K Report. As discussed below, T-Mobile is filing its 2024 10-K Report herewith.

⁴ Attachment 1 to the February 22, 2024 Responses was superseded by Attachment 1A to the April 18, 2024 Responses. Attachment 2, T-Mobile's 2023 10-K Report, is not necessary because T-Mobile is filing its 2024 10-K Report herewith. Attachment 3, which was filed confidentially, relates to the Affordable Connectivity Program, which was discontinued in 2024 and is not relevant.

⁵ Attachment 6 to the March 5, 2024 Responses, which was filed confidentially, relates to the Affordable Connectivity Program, which was discontinued in 2024 and is not relevant.

II. ADDITIONAL UPDATED INFORMATION

To supplement the record in this proceeding, Assurance Wireless hereby submits the following updated information, replacing documents that were filed in Docket TC24-002 that are now out-of-date:

Attachment	Name
R	September 19, 2024 letter from CTIA to T-Mobile re: T-Mobile's recertification process for its Business Continuity/Disaster Recovery Program.
S	May 17, 2024 letter from CTIA to T-Mobile re: T-Mobile's recertification for compliance with CTIA Consumer Code.
T	Assurance Wireless' 2024 10-K Report

In addition, since the January 2024 filing of Assurance Wireless' Petition in Docket TC24-002, T-Mobile has made investments to improve its coverage and capacity in South Dakota. It has made substantial capital investments in network growth, network experience, backup power, and other facilities in South Dakota since April 1, 2024. In addition, T-Mobile is in the process of acquiring USCellular's wireless operations and spectrum assets. Although USCellular has no facilities in South Dakota, the assets being acquired by T-Mobile may enable it to improve wireless coverage in some parts of South Dakota.

Also, some of the responses to Staff's discovery in Docket No. TC 24-002 are focused on the Affordable Connectivity Program ("ACP"). That program was discontinued in 2024 and so information about it is generally obsolete. Finally, Assurance Wireless no longer offers a free handset as it did in 2024. Instead, a customer can provide their own handset or purchase a discounted compatible device from Assurance Wireless. Additional details are available at <https://www.assurancewireless.com/phone-options>.

III. AFFIRMATION

Assurance Wireless has reviewed the information listed and provided above and hereby verifies that the above-listed information remains correct in all material respects, except where the passage of time has rendered previously-submitted information obsolete.

Respectfully submitted, this the 12 day of June, 2025.



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