BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FILING OF TELRITE CORPORATION d/b/a LIFE WIRELESS' 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	**TC25-002**

RESPONSES OF TELRITE CORPORATION D/B/A LIFE WIRELESS TO STAFF'S THIRD DATA REQUEST

Telrite Corporation d/b/a Life Wireless ("**Telrite**") provides the following response to the third set of data requests of the South Dakota Public Utilities Commission Staff issued on October 6, 2026 ("**Third Data Request**").

RESPONSE TO THIRD DATA REQUEST

1. **Referring to the company's response to Staff Data request DR 2-2:**

   a. **Describe the specific location or geocoding software used to verify a customer's location. Does the company rely on a commercial product, an internal system, or a third-party database to verify that new lifeline subscribers do not reside in a rural service area?**

   Respondent: Derek Wong, Director of Software Development

   Response:

   Telrite can obtain study area boundary shapefiles from the FCC at https://us-fcc.box.com/v/studyareaboundaries. The company will extract the information and store it in its internal database. When a consumer applies for Lifeline service, the company will geocode the applicant's physical address using Melissa Data Geocode API and compare the resulting location against the study area boundary data to determine whether the address is within Telrite's approved ETC service area. If not, the company will decline to enroll that applicant.

   b. **Does Telrite maintain any internal logs or documentation of address-verification attempts for those zip codes that overlap rural service areas?**

   Respondent: Derek Wong, Director of Software Development

   Response:

   Yes. Telrite maintains internal logs of address-verification results and will retain documentation of address-verification results for South Dakota applicants whose zip codes overlap rural service areas.

   c. **How does the company handle applicants with non-traditional addresses (rural routes, P.O. boxes, newly-developed areas, etc.)?**

   Respondent: Leah Gsell, Director of Compliance

   Response:

   Telrite will require applicants to provide a physical residential address, consistent with FCC Lifeline requirements. (47 C.F.R. § 54.410(d)(2)(ii)). A P.O. box alone will not be accepted as a residential address. For applicants with nontraditional addresses, including rural route addresses

or addresses in newly developed areas, Telrite will follow the applicable federal Lifeline address-verification procedures. Telrite will also verify that the applicant's residential location falls within its authorized ETC service area before enrollment.

d. What position at the company has the responsibility to verify the address would be in a non-rural service area? Is there more than one position at the company that does this apart of their assigned job duties? Identify those positions.

Respondent: Derek Wong, Director of Software Development

Response:

Derek Wong, Director of Software Development, will be responsible for ensuring that applicants' addresses are verified as being within Telrite's authorized non-rural service area before service is provided. Leah Gsell, Director of Compliance, will provide compliance oversight and serve as a resource for questions concerning the address-verification requirements.

Respectfully submitted,



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