

**BEFORE THE  
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

In the Matter of )  
 )  
Application of Grasshopper Group, LLC ) Docket No. \_\_\_\_\_  
For a Certificate of Authority for )  
Interexchange Service )

**Application for a Certificate of Authority for Interexchange Service**

COMES NOW, Grasshopper Group, LLC ("Grasshopper"), a Massachusetts limited liability company, by and through its undersigned counsel, and requests pursuant to A.R.S.D. § 20:10:24:02 of the Public Utilities Commission's ("Commission") Administrative Rules, a certificate of authority for interexchange service and submits the following information in support thereof:

**1. The applicant's name, address, telephone number, facsimile number, web page URL, and E-mail address (A.R.S.D. § 20:10:24:02 (1)):**

Company Name: Grasshopper Group, LLC  
Address: 333 Summer Street, 5<sup>th</sup> Floor  
Boston, Massachusetts 02210  
Telephone Number: 617-396-5700  
Fax Number: 866-466-1618  
Toll-Free Number: 800-820-8210  
Email Website: [www.grasshopper.com](http://www.grasshopper.com)

**2. A description of the legal and organizational structure of the applicant's company (A.R.S.D. § 20:10:24:02(2)):**

Grasshopper Group, LLC is a Massachusetts limited liability company organized on December 4, 2002.

**3. The name under which applicant will provide interexchange services if different than in subdivision (1) of this section (A.R.S.D. § 20:10:24:02(3)):**

Grasshopper will not be providing interexchange services under a different name.

**4. A copy of the applicant's certificate of authority to transact business in South Dakota from the Secretary of State (A.R.S.D. § 20: 10:24:02(4)):**

A copy of Grasshoppers Certificate of Authority from the South Dakota Secretary of State is attached hereto as **Exhibit A**.

**5. The location of the applicant's principal office, if any, in this state, and the name and address of its current registered agent, if applicable (A.R.S.D § 20:10:24:02(5)):**

Currently, Grasshopper does not have a principal office located in South Dakota. Grasshopper's Registered Agent in South Dakota is Corporation Service Company, 503 S Pierre St, Pierre, SD 57501-4522.

**6. A list and specific description of the types of services the applicant seeks to offer (A.R.S.D. § 20:10:24:02 (6)):**

Grasshopper seeks authority to provide resold interexchange telecommunications services in order to meet customer demand for connectivity and advanced telecommunications services in the State of South Dakota. Grasshopper will comply with all applicable Commission rules, regulations and standards, and will provide safe, reliable and high-quality telecommunications services in the State of South Dakota.

Grasshopper will primarily provide services utilizing facilities from other providers and will not be constructing any facilities for the purpose of providing interexchange services.

**7. A detailed statement of how the applicant will provide its services (A.R.S.D § 20: 10:24:02(7)):**

Grasshopper has entered into separate contracts with multiple carriers to provide phone numbers, intrastate and interstate connectivity, minutes that Grasshopper incorporates into its services and resells to its customers. Grasshopper has prior experience offering interexchange services in approximately 30 other states, where it has successfully delivered reliable and compliant telecommunications solutions. This operational history demonstrates the Grasshopper's sufficient managerial and technical capability to provide high-quality interexchange services in South Dakota.

Grasshopper is a subsidiary of the GoTo Group, Inc. Biographies for key members of the GoTo Group's executive leadership team are provided in **Exhibit B**. For a complete list of the executive leadership team for the GoTo Group, please visit <https://www.goto.com/company/leadership>.

**8. A service area map or narrative description indicating with particularity the geographic area proposed to be served by the applicant (A.R.S.D. § 20:10:24:02(8)):**

Grasshopper intends to provide its services throughout the State of South Dakota.

**9. For the most recent 12 month period, financial statements of the applicant including a balance sheet, income statement, and cash flow statement. The applicant shall provide audited financial statements, if available (A.R.S.D. § 20:10:24:02(9)):**

Grasshopper does not maintain standalone financial statements. Detailed consolidated financial statements for Grasshopper's parent company, LMI Parent, L.P. and all of its subsidiaries, including Grasshopper, are enclosed under seal and pursuant to a request for confidential treatment as **CONFIDENTIAL Exhibit C**.

**10. The names, addresses, telephone number, facsimile number, E-mail address, and toll free number of the applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters and a description of how the applicant handles customer service matters (A.R.S.D. § 20:10:24:02(10)):**

Grasshopper Customer Care representatives and 24-hour automated customer assistance allow customers to bring service, billing and repair questions or complaints to the Company's attention 24 hours a day, 7 days a week. Customers may access Grasshopper's Customer Care toll-free at (800) 820-8210 to initiate service complaints or to receive updates on reported problems or pending customer service complaints. Customers may also contact Grasshopper Customer Care 24 hours a day via the company's website, [www.grasshopper.com](http://www.grasshopper.com). Inquiries regarding service or billing may also be made in writing.

The individuals with overall responsibility for the resolution of repairs/maintenance questions, customer complaints, billing inquiries, refunds and other customer service-related inquiries and regulatory matters are:

**For complaint matters by Customers:**

Doug Squires  
Grasshopper Group, LLC  
333 Summer Street, 5th Floor  
Boston, MA 02s210  
805-617-7098  
[telecom@goto.com](mailto:telecom@goto.com)

**For regulatory matters:**

MP Kang  
Deputy General Counsel  
GoTo Technologies USA, LLC  
333 Summer Street, 5th Floor  
Boston, MA 02210  
(385)-387-3187  
[telecom@goto.com](mailto:telecom@goto.com)

**11. Information concerning how the applicant plans to bill and collect charges from customers (A.R.S.D. § 20:10:24:02(11)):**

Grasshopper will bill customers directly. Customer payments will be made directly to Grasshopper.

**12. Information concerning the applicant's policies relating to solicitation of new customers and a description of the efforts the applicant shall use to prevent the unauthorized switching of interexchange customers (A.R.S.D. § 20:10:24:02(12)):**

Grasshopper will follow federal and state laws and rules regarding solicitation of new customers and efforts to prevent the unauthorized switching of interexchange customers. Customers will not have their services switched to Grasshopper without a written letter of authorization for new service and changes in service. All affected employees are aware of these procedures and will be immediately disciplined if the procedures are not followed. Grasshopper markets and sells its services through its website, through direct sales, and through sales agents. Grasshopper does not utilize unaffiliated telemarketers.

**13. Information concerning how the applicant will make available to any person information concerning the applicant's current rates, terms, and conditions for all of its telecommunications services (A.R.S.D. § 20:10:24:02(13)):**

Current rates, terms, and conditions will be made available to the public and customers via Grasshopper's website, [www.grasshopper.com](http://www.grasshopper.com).

**14. Information concerning how the applicant will notify a customer of any materially adverse change to any rate, term, or condition of any telecommunications service being provided to the customer. The notification must be made at least thirty days in advance of the change (A.R.S.D. § 20:10:24:02(14)):**

Changes to rates, terms or conditions will be made at least thirty days in advance via direct mail, bill inserts, in product, and/or email notification.

**15. A list of the states in which the applicant is registered or certified to provide telecommunications services, whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial, a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified, and a detailed explanation of why the applicant is not in good standing in a given state, if applicable (A.R.S.D. § 20:10:24:02:15):**

Grasshopper is presently authorized to provide interexchange long distance telecommunications services pursuant to a registration, public service commission order, or on a deregulated basis in the states of Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, New Jersey, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Washington, West Virginia, and the District of Columbia. Grasshopper has filed applications for authority to provide interexchange services in Oklahoma, and Virginia, and expects to file in the near future applications for authority to provide interexchange services in Montana, New Mexico, Vermont, Wisconsin, Wyoming, and Puerto Rico.

Grasshopper is in good standing with the appropriate regulatory agencies in each of these states and has never been denied registration or certification in any state.

**16. A description of how the applicant intends to market its services, its target market, whether the applicant engages in any multilevel marketing, and copies of any company brochures used to assist in the sale of services (A.R.S.D. § 20:10:24.02.16)):**

Grasshopper will market interexchange services through direct sales, sales agents, digital outreach, and community and industry channels to reach business customers in South Dakota. Grasshopper may utilize sales agents to market its services; however, all customer contracts are concluded with Grasshopper. Representative marketing materials may be found at [www.grasshopper.com](http://www.grasshopper.com).

Marketing will consist of a mix of direct account executive outreach, sales agent outreach, website and online campaigns, targeted email, and participation at community and industry events appropriate to interexchange services. Traditional advertising such as print and radio may be used selectively to support brand awareness for long-distance and related interexchange offerings statewide.

**17. Federal tax identification number and South Dakota sales tax number (A.R.S.D § 20:10:24:02 (17)):**

Federal EIN: 20-5918212.

South Dakota sales tax number: 1023-7848-ST.

**18. The number and nature of complaints filed against the applicant with any state or federal regulatory commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered (A.R.S.D §20:10:24:02 (18)):**

None.

**19. Other information requested by the commission needed to demonstrate that the applicant has sufficient technical, financial, and managerial capabilities to provide**

**the interexchange services it intends to offer consistent with the requirements of this chapter and other applicable rules and laws (A.R.S.D §20:10:24:02 (20)):**

Grasshopper will provide further information as reasonably requested by the Commission.

Respectfully submitted,

GRASSHOPPER GROUP, LLC



By: \_\_\_\_\_

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Dated: March 12, 2026