

Docket Number: TC26-001
Subject Matter: First Set of Data Requests
Request to: Grasshopper Group, LLC
Request from: South Dakota Public Utilities Commission Staff
Date of Request: March 13, 2026
Responses Due: March 27, 2026

Grasshopper Group, LLC (“Grasshopper” or “Applicant”), hereby responds to South Dakota Public Utilities Commission Staff’s First Set of Data Requests as follows:

General Questions

- 1-1. Refer to response to ARSD 20:10:24:02 (1). Provide an email address as required by ARSD 20:10:24:02 (1). (Note a link to a website is not an email address.)

Response: Applicant’s email address is: telecom@goto.com.

- 1-2. Refer to the response to ARSD 20:10:24:02 (6). Provide a list and specific description of the telecommunications services the applicant intends to offer as required.

Response: Applicant intends to offer only interexchange services.

Applicant's solution provides small and very small businesses, such as solo entrepreneurs, a professional, business telephony service that they can operate while on-the-go, including from their personal mobile device. This service enables Applicant's customers to keep their personal and business telephony services separate, while reducing the financial investment required to maintain a business phone system. Applicant does not provide dial tone or "local" service as customers must have their own existing wireless or wireline service.

1-3. Refer to the response to ARSD 20:10:24:02(7). Provide specific details of how the applicant will provide its services as required.

- a) How and what type of carriers does Grasshopper contract with (are these IXC, ILEC, Wireless, VoIP companies)?

Response: Applicant contracts with upstream cloud communications platform providers (Cloud Platform as a Service), such as [REDACTED].

- b) How and where does the company get its numbering resources from?

Response: Applicant obtains its numbering resources, including local, toll free, and specialty/vanity numbers, from its upstream providers.

- c) Does the company anticipate utilizing large blocks of numbers?

Response: While Applicant can obtain large blocks of numbers from its upstream providers, it is Applicant's practice to procure only what it needs based on projected demand from new and existing customers.

- d) Does the company have any procedures in place to reduce the amount of numbering resources it utilizes?

Response: Yes. As noted above, Applicant requests and receives numbers as they are needed, based on projected demand from new and existing customers.

1-4. Refer to the response to ARSD 20:10:24:02(8). Provide a service area map or a narrative description indicating with particularity the geographic area proposed to be served as required.

a) Have you been to South Dakota?

Response: Applicant is authorized to transact business in South Dakota. See Exhibit A to Grasshopper's Application. As stated elsewhere in the Application, Applicant is a member of the GoTo group of companies. The employing entity for all GoTo group companies in the United States is Applicant's parent company, GoTo Technologies USA, LLC. While GoTo Technologies USA, LLC currently employs no employees in South Dakota, it operates on a work-from-anywhere basis, and recruits for positions on a national basis. Because of this policy, it is possible that, in the future GoTo Technologies USA, LLC, could employ personnel located in South Dakota. Applicant does not currently maintain, nor does it currently anticipate obtaining, a physical presence in South Dakota.

b) Are you familiar with the geographic area?

Response: Yes.

c) Do you plan to serve rural areas?

Response: Applicant intends to provide service wherever customers request service, including in rural areas.

1-5. Refer to the response to ARSD 20:10:24:02(9). Provide the most recent 12-month period, financial statements of the applicant including a balance sheet, income statement, and cash flow statement, which would be through the end of 2025 as required.

[REDACTED]

a) [REDACTED]

[REDACTED]

b) [REDACTED]

[REDACTED]

c) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d) [REDACTED]

[REDACTED]

e) [REDACTED]

[REDACTED]

f) [REDACTED]

[REDACTED]

g) [REDACTED]

[REDACTED]

h) [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

i) [REDACTED]

[REDACTED]
[REDACTED]

j) [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

k) [REDACTED]

[REDACTED]

l) [REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

m) [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- 1-6. Refer to the response to ARSD 20:10:24:02(10). Provide a facsimile number for the contacts provided as required. Provide a description of how the applicant handles customer service matters as required. (Note a description of how customers can contact the customer service department, is not a description of how the applicant handles customer service matters.)

Response: Facsimile Number: 1-781-437-1820.

How Applicant Handles Customer Service Matters: Applicant provides customers with multiple means of contacting its Customer Care organization. Most customers submit their concerns online, using the intake method provided at <https://support.grasshopper.com/contact>. If a customer wishes to speak to a Care representative over the phone, customers may use this online feature to input general case and contact information. Customers will then receive a telephone number to contact Customer Care along with a case number to reference on their call. Case progress, including Care agent assigned and internal escalations and interaction notes, is tracked by Applicant's Customer Care team in its case management system through case resolution. Applicant provides team members who are able to assist customers address various types of customer issues, including technical issues, general service questions, service and feature set up, concerns with call quality, number porting requests, and billing or account issues.

In addition, Applicant's support site (<https://support.grasshopper.com/>) provides articles and self-help tools to help customers address common questions. Customers may also view service status from this page.

1-7. Refer to the response to ARSD 20:10:24:02(11) As required provide information concerning how the applicant plans to bill and collect charges from customers.

a) Will the applicant bill monthly?

Response: Yes, Applicant will bill monthly. Specifically, Applicant bills monthly service charges for each month and bills usage in arrears.

b) Does the applicant plan to offer any prepaid services including prepaid calling cards?

Response: Applicant does not plan to offer prepaid services or prepaid calling cards.

c) Will the applicant accept or require any deposits or advance payments?

Response: Applicant does not accept or require deposits or advance payments for intrastate calls (calls within the State of South Dakota), interstate calls (calls from South Dakota to another continental US state) or calls to or from Canada. Applicant may require an advance payment of \$500 when a customer activates international calling, *i.e.*, calling outside the continental United States or Canada. This advance payment is not a deposit that is held against potential default or non-payment. Rather, it is an advance payment of the initial \$500 in international toll charges for calls outside of the continental United States and such charges are immediately billed against the advance payment until it is fully depleted. Once the advance payment is depleted, Applicant bills this international usage in arrears and does not require additional advance payments for these services.

- 1-8. Refer to the response to ARSD 20:10:24:02 (16). Provide who your target market is. Provide whether the applicant engages in any multilevel marketing. Provide copies of any company brochure used to assist in the sales of services. (Note referral to a website is not copies of any company brochure used to assist in the sale of services.)

Response: Grasshopper's target market is the small and very small business (e.g. solo entrepreneurs) who desire to establish a professional, business telephony service that they can operate while on-the-go, including from their personal mobile device. This service enables the small and very small businesses to keep their personal and business telephony services separate, while reducing the financial investment required to maintain a business phone system.

Most Grasshopper sales are conducted via the company's website, although Grasshopper has appointed a small number of marketing agents who promote Grasshopper services. Grasshopper primarily markets through its website; it does not maintain brochures, opting, instead, to rely on its website for its product communication needs.

- 1-9. Refer to response to ARSD 20:10:24:02(19). Provide a written request for waiver of those rules the applicant believes to be inapplicable.

Response: Applicant does not request waiver of Commission rules.

1-10. The applicant's website says the following: **"Does Grasshopper replace my service provider?**
No. Grasshopper is an entrepreneur phone system that provides a number of great features, including a second phone number, but you still need a service provider for your personal phone number, where your Grasshopper calls will be forwarded."

a) Provide a detailed explanation of what this means.

Response: Please see response to DR#1-8. Grasshopper's solution does not provide dial tone or "local" telephone service. Grasshopper's solution enables a customer to establish a virtual business presence using their existing wireless or wireline service with features such as enhanced voicemail, Interactive Voice Response, and programmable call routing. Because Grasshopper does not provide dial tone, Grasshopper customers must have an existing service in order to place or receive calls through the Grasshopper solution. Additional information is available on Grasshopper's website at <https://grasshopper.com/>.

b) Is this the type of set up the applicant plans to deploy in South Dakota?

Response: Yes

1-11. Have you paid the \$250 filing fee that is required by SDCL 49-31-3? If not, when will that be paid?

Response: Yes. Applicant submitted a check in the amount of \$250 for the filing fee. The submission was delivered on March 25, 2026.