

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF IM TELECOM, LLC DBA)
INFINITI MOBILE FOR DESIGNATION)
AS AN ELIGIBLE TELECOMMUNICATIONS) CASE NO.
CARRIER IN THE COMMONWEALTH) 2016-00276
OF KENTUCKY)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO IM TELECOM, LLC.

IM Telecom, LLC d/b/a Infiniti Mobile ("Infiniti Mobile"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within 15 days of the date of this request. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Infiniti Mobile shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Infiniti Mobile fails or refuses to furnish all or part of the requested information, Infiniti Mobile shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. If the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Infiniti Mobile shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Confirm that Infiniti Mobile seeks to receive funds from both the federal Universal Service Fund ("USF") and the Kentucky USF for the provision of Lifeline service to qualifying Kentucky customers.

2. Refer to the Application, page 3, which states that Infiniti Mobile is a commercial mobile service provider ("CMRS") throughout the United States. Provide a list of the states in which Infiniti Mobile provides service along with the total number of customers served and the percentage of those customers receiving Lifeline Service.

3. Refer to the Application, page 3, which states that Infiniti Mobile has ETC petitions pending before ten state utility commissions, in addition to this case, and before the Federal Communications Commission for ETC designation in an additional 12 jurisdictions. Provide docket numbers for each of the proceedings and, if a final order has been issued, provide a copy.

4. Refer to the Application, page 4, which states that Infiniti Mobile “intends to be a leader in the prepaid marketplace by offering consumers exceptional value and competitive amounts of voice usage at affordable price points.” Describe Infiniti Mobile’s Lifeline service plans and discuss how they differ from other providers offering Lifeline service in Kentucky.

5. Discuss Infiniti Mobile’s ability to offer Lifeline subscribers mobile data.

6. Refer to the Application, page 6, which references the enrollment method. Confirm that Infiniti Mobile will not have any agents or in-person events in Kentucky.

7. Refer to the Application, page 5. Identify the “neighborhood retailers” that will be used to market Infiniti Mobile’s service.

8. Describe the training, education, and qualifications of the employees who will be used to market Lifeline, and state whether they will be employees directly employed by Infiniti Mobile, or will be sub-contracted.

9. Does Infiniti Mobile share any common ownership or affiliation with any other Lifeline providers?

10. Refer to the Application, pages 12–14, which detail how Infiniti Mobile will advertise the availability of Lifeline service. Describe in further detail Infiniti Mobile’s marketing plan and the inclusion of print, radio, and television advertisements.

11. Refer to the Application, pages 14–15, which state that Infiniti Mobile seeks designation as an ETC only in the non-rural exchanges of BellSouth Telecommunications, LLC d/b/a AT&T-Kentucky, Cincinnati Bell Telephone Company, and Windstream Kentucky East, LLC. Explain why Infiniti Mobile does not seek to serve the rural exchanges of these companies or any other rural company in Kentucky.

12. Confirm that Infiniti Mobile will collect or otherwise contribute the Kentucky USF per-line surcharge, currently \$.14 per line per month, to the Kentucky USF for each Infiniti Mobile Kentucky customer, both Lifeline and non-Lifeline.

13. Confirm that Infiniti Mobile will collect or otherwise contribute the Kentucky Telecommunications Relay Service/Telecommunications Access Program surcharge, currently \$.04 per line per month, to the Kentucky Telecommunications Relay Service/Telecommunications Access Program Fund for each Infiniti Mobile Kentucky customer, both Lifeline and non-Lifeline.

14. Confirm that Infiniti Mobile will contribute to the Commercial Mobile Radio Service Emergency Telecommunications Fund pursuant to KRS 65.7635.

15. Confirm that Infiniti Mobile will comply with the annual assessment and gross earnings reports requirements pursuant to KRS 278.130–150.



Talina R. Mathews
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED AUG 25 2016

cc: Parties of Record

*Honorable Matthew R Malone
Attorney at Law
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*IM Telecom, LLC d/b/a Infiniti Mobile
1705 South Baltimore Avenue
Tulsa, OK 74119