

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF I-WIRELESS, LLC FOR )  
DESIGNATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER IN THE ) CASE NO. 2010-00478  
COMMONWEALTH OF KENTUCKY FOR THE )  
LIMITED PURPOSE OF OFFERING LIFELINE )  
SERVICE TO QUALIFIED HOUSEHOLDS )

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO I-WIRELESS, LLC

I-wireless, LLC ("i-wireless"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before February 28, 2011. 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.

I-wireless 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 Highland fails or refuses to furnish all or part of the requested information, Highland 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. Kentucky currently requires that all Eligible Telecommunications Carriers ("ETCs") perform an audit of all customers receiving Lifeline benefits. Each customer must provide proof of eligibility. Does i-wireless agree to audit all Lifeline customers each year rather than conduct a yearly audit of only a sample of customers?

2. Has i-wireless begun the certification process for Public Safety Answering Points in Kentucky? If so, when did the process begin and when will it conclude?

3. Explain the process by which i-wireless will verify the eligibility of Lifeline customers. Provide details about how and where Lifeline subscribers will be able to initiate service.

4. For those customers that choose the default plan with no out-of-pocket cost, how will i-wireless monitor the accounts of Lifeline customers to ensure that the customers are receiving the benefit of the service?

a. For example, if a customer stops using his or her Lifeline i-wireless phone after six months, or if the wireless device is damaged so that it cannot be used, will i-wireless continue to credit the customer with minutes to his or her account?

b. Under the scenario described above, will i-wireless continue to receive Universal Service Fund disbursements for the provision of service even if the service is not being used?

5. The Kentucky Universal Service Fund for Lifeline support is maintained by a fee of eight cents per access line per month from every wireline and wireless subscriber, which is collected by carriers. Does i-wireless collect this surcharge from any of its customers?

6. The Kentucky Telecommunications Relay Service and the Kentucky Telecommunications Access Program are supported by a surcharge, which is collected by carriers. Each fund is supported by a fee of two cents per access line per month from every wireline and wireless subscriber, which is collected by the carriers. Does i-wireless collect this surcharge from any of its customers?

7. Do i-wireless' customers pay the statewide wireless 911 fee?

8. Does i-wireless seek to receive Lifeline support from the Kentucky Universal Service Fund?

9. Provide a list of all states in which i-wireless operates.

10. a. List all states in which i-wireless has received ETC status.

b. List all pending ETC petitions, with docket numbers and the state in which the designation is requested.

11. Has i-wireless filed for ETC status in any state and subsequently withdrawn the petition or been denied ETC status? If so, list the state, docket number, and i-wireless' reason for seeking withdrawal of the petition for that state.

12. How many Kentucky customers does i-wireless presently serve?

13. If i-wireless receives ETC designation in Kentucky, approximately how long will it take for i-wireless to offer Lifeline service in the area in which it receives the ETC designation? Elaborate on any extenuating or special circumstances.

14. Do i-wireless' customers have access to competitive directory assistance providers, as defined as by 47 C.F.R. 54.101(a)(8)? If not, explain why.

15. Does i-wireless understand that there may be an audit by the Commission of the use of universal service funds and that the eligible telecommunications service designation may be reviewed annually?

16. Has i-wireless been audited by other state utility commissions regarding its use of universal service funds? If so, list the state and the result of the audit.

17. Does i-wireless have any outstanding complaints at any state commissions or at the Federal Communications Commission ("FCC")? Provide detailed documentation of any complaint filed with a state commission or at the FCC in the past three years.

18. Provide a description of i-wireless' corporate structure, with both names and titles. Also provide a list of i-wireless' owners or corporate officers and indicate if any are also owners, corporate officers, or employees of any other telecommunications companies.

19. Will i-wireless seek toll limitation service reimbursement from Universal Service Administrative Company ("USAC") if granted ETC status? If so, provide a detailed list of the incremental costs it will be claiming, along with a detailed description to support the amounts to be claimed.

20. Will i-wireless seek Link-Up reimbursement from USAC if granted ETC status? If so, list the amount per customer i-wireless would be claiming.

21. Will i-wireless seek Lifeline reimbursement from USAC if granted ETC status? If so, list the amount per customer i-wireless would be claiming.

22. Will i-wireless seek Lifeline reimbursement from the Kentucky Universal Service Fund if granted ETC status? If so, list the amount per customer i-wireless would be claiming.

23. Does i-wireless maintain separate books/general ledgers for each state in which it operates? Where are the books/general ledgers for Kentucky customers maintained? Provide the physical address, office telephone number, and name and title of employee responsible for maintaining those books/general ledgers.

24. Provide the number of requests for service from potential customers in Kentucky that were unfulfilled by i-wireless in the previous calendar year.

25. Provide the address (URL) to the i-wireless website, if there is one.

26. What recurring and nonrecurring costs will a new Lifeline customer incur from becoming an i-wireless customer over the period of a year?

27. Provide the name of the person (with business title) and/or entity that will be filing the Form 497 with USAC if i-wireless obtains ETC status.

28. Does i-wireless provide service to its customers via a prepaid service? If so, what percentage of its customers receive their service via a prepaid service?

29. Have any owners, officers, or managers of i-wireless been involved in any bankruptcy proceedings? If so, provide details as to the name of the person, the date on which the petition was filed, the case number, and the name of the federal court district where the petition was filed.

30. Have any owners, officers, or managers of i-wireless been charged or convicted of a criminal offense during the last 10 years (either state or federal)? If so, provide details as to the name of the person, the dates of each charge, the case number, and the name of the state or federal court district where the charges or convictions occurred.

31. Identify any civil litigation in which an i-wireless owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness within the last 10 years.

32. If a Lifeline customer enrolls in either of the optional plans whereby the customer must pay a monthly fee, describe the process which i-wireless will employ if a customer does not pay his or her monthly fee.

a. Is there a grace period for making payment?

b. Would the customer have to re-enroll in Lifeline if they do not make payment for a month?

c. Are Lifeline customers charged a reconnection fee?

33. Does i-wireless use agents or other retailers to market and sell its service? Provide a list.

34. Describe the process that I-wireless intends to use to sign up customers for Lifeline. Will i-wireless verify the customer's eligibility in the designated programs?

35. Will i-wireless be willing to advertise Lifeline and Link-Up availability in languages other than English? If so, name the other languages.

36. Does i-wireless have any telecommunications facilities used to provide service? If so, give a description and location.

37. Will i-wireless be using any subcontractors (operations, call centers, etc.) to provide the required services? If so, provide the name of each company and the physical address.

38. Does i-wireless understand that Kentucky does not allow consumers to qualify for Lifeline under the income guidelines?

39. I-wireless states in its application that the FCC granted its petition for forbearance.<sup>1</sup> I-wireless also attached, as Exhibit 4, the response and compliance plan that it filed with the FCC. Has that plan been approved by the FCC?

40. I-wireless states in its application at page 5 that it will apply a discount of \$15 to any i-wireless rate plan. Given that the reimbursement amount available to ETCs is less than \$15, how did i-wireless arrive at giving a \$15 discount, and how will that discount be funded?

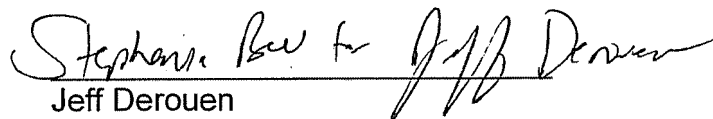
41. I-wireless states that it will resell the service of Sprint. Please provide a detailed map depicting the service area in Kentucky along with a table listing Common Language Location Identifier Codes of all areas to which service will be provided in Kentucky.

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<sup>1</sup> Petition at 7 and Exhibit 3.

42. Do any of i-wireless' plans include the carryover of unused minutes from one month to the next?

43. Further describe the methodology or calculation of the Free Minute program employed through the Kroger Company.



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DATED: JAN 26 2011

cc: Parties of Record



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