

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF T-MOBILE)	
CENTRAL LLC AND POWERTEL/MEMPHIS,)	
INC. FOR CONVERSION OF ITS HIGH-COST)	
ELIGIBLE TELECOMMUNICATIONS CARRIER)	CASE NO.
DESIGNATION AND FOR RELINQUISHMENT)	2020-00415
OF ITS MOBILITY FUND I ELIGIBLE)	
TELECOMMUNICATIONS CARRIER)	
DESIGNATION PURSUANT TO)	
47 U.S.C. 214(E)(4))	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC.

T-Mobile Central LLC and Powertel/Memphis, Inc. (T-Mobile), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due within seven days of the date of this request. The Commission directs T-Mobile to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 the 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.

T-Mobile shall make timely amendment to any prior response if T-Mobile obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which T-Mobile fails or refuses to furnish all or part of the requested information, T-Mobile shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When 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. When filing a paper containing personal information, T-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 T-Mobile requests the Commission to grant relinquishment of T-Mobile's Eligible Telecommunications Carrier (ETC) designation for the area in which

it was designated for purposes of participating in the Mobility Fund Phase I Auction for both high-cost and low-income funding.

2. Confirm that T-Mobile does not seek to offer Lifeline service to customers in the area in which it was designated for purposes of participating in the Mobility Fund Phase I Auction.

3. Provide the number of Lifeline customers that T-Mobile serves in the area designated by the Mobility Fund Phase I Auction. If the number is not zero, provide the plan to notify Lifeline customers that it will no longer provide service.

4. Provide the number of Lifeline customers that T-Mobile serves outside the area designated by the Mobility Fund Phase I Auction.

5. Confirm that T-Mobile has procedures in place to limit offering Lifeline service to areas outside of the Mobility Fund Phase I Auction area.

6. Confirm that T-Mobile does not seek to provide Lifeline service statewide subject to wireless coverage.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED JAN 25 2021

cc: Parties of Record

*Gerald E Wuetcher
Attorney at Law
STOLL KEENON OGDEN PLLC
300 West Vine Street
Suite 2100
Lexington, KENTUCKY 40507-1801

*Honorable Kendrick R Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KENTUCKY 40202-2828

*William Haas
Senior Corporate Counsel
T-Mobile
2001 Butterfield Rd., Suite 1900
Downers Grove, ILLINOIS 60515

*T-Mobile Central, LLC dba T-Mobile
12920 SE 38th Street
Bellevue, WA 98006