

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 28 2014

PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF TOTAL CALL MOBILE,)
INC. FOR LIMITED DESIGNATION AS) CASE NO.
AN ELIGIBLE TELECOMMUNICATIONS) 2014-00268
CARRIER)

**TOTAL CALL MOBILE, INC.'S RESPONSES TO THE KENTUCKY PUBLIC
SERVICE COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

Information Request #1: Confirm that Total Call does not seek to receive funds from the Kentucky Universal Service Fund ("USF") for the provision of Lifeline service to Kentucky customers.

Response to Information Request #1: Yes, Total Call Mobile, Inc. ("Total Call" or the "Company") does not seek to receive funds from the Kentucky USF at this time.

Information Request #2: Refer to page 4 of the Application, which states that Total Call "intends to be the leader in the wireless marketplace by offering exceptional value and competitive amounts of voice usage at all price points to consumers." Compare and contrast Total Call's service offerings to those of other Lifeline providers.

Response to Information Request #2: Total Call has requested this information from its sales and marketing department but is still awaiting a response. As such, Total Call hereby requests an extension to respond to this question.

Information Request #3: Throughout the Application and Exhibits, Total Call references tribal and non-tribal customer plans. Kentucky does not have any tribal lands as defined by 47 C.F.R. § 54.400(e). Confirm that Total Call's inclusion of plans to customers in tribal lands in the Application was inadvertent.

Response to Information Request #3: Yes, Total Call's inclusion of plans to customers in tribal lands for Kentucky was inadvertent because Total Call's tribal plans are only applicable to states with tribal lands.

Information Request #4: Refer to page 7 of the Application. Describe Total Call's proposed in person events that it will use to sign up Lifeline customers.

Response to Information Request #4: CONFIDENTIAL AND PROPRIETARY.

[Redacted]

[Redacted]

Information Request #5: Refer to page 7 of the Application, which states that Total Call's "distribution network" will be used to provide information to applicants for Lifeline service. Describe Total Call's "distribution network."

Response to Information Request #5: CONFIDENTIAL AND PROPRIETARY.



Information Request #6: Refer to page 7 of the Application, which states that Total Call has a 90-day non-usage policy. Explain how this complies with 47 C.F.R § 54.407 (c)(2), which requires a 60-day non-usage policy.

Response to Information Request #6: To clarify, Total Call has a 60-day non-usage policy with a 30-day cure period. While 47 C.F.R § 54.407 (c)(2) states that an ETC “shall only continue to receive universal service support reimbursement for such Lifeline service provided to subscribers who have used the service within the last 60 days, or who have cured their non-usage...”, 47 C.F.R § 54.405 (e)(1) states that the carrier “must allow a subscriber 30 days following the date of the impending termination letter required to demonstrate continued eligibility...an eligible telecommunications carrier must terminate any subscriber who fails to demonstrate continued eligibility within the 30-day time period.” Total Call does not and will not seek reimbursement for the 30 day grace period following 60 days of non-usage.

Witness: Hideki Kato, Chief Operating Officer, Total Call Mobile, Inc.

Information Request #7: Refer to pages 14-15 of the Application, which detail how Total Call will advertise the availability of supported services. Provide further explanation describing Total Call's marketing plan and the inclusion of print, radio, and television advertisements, if any.

Response to Information Request #7: Total Call has requested this information from its sales and marketing department but is still awaiting a response. As such, Total Call hereby requests an extension to respond to this question.

Information Request #8: Refer to page 16 of the Application, which states that Total Call can provide service in every Zip Code in Kentucky. Provide maps or other documentation that demonstrate that Sprint PCS, the underlying carrier of Total Call, provides service in every Zip Code in Kentucky.

Response to Information Request #8: Total Call has requested these maps from Sprint but is still awaiting a response. As such, Total Call hereby requests an extension to respond to this question.

Witness: Hideki Kato, Chief Operating Officer, Total Call Mobile, Inc.

Information Request #9: For each state in which Total Call has been designated as an Eligible Telecommunications Carrier for the purpose of offering Lifeline service, provide the percentage of Lifeline customers as compared to total customers in each state.

Response to Information Request #9: Total Call has requested this information from its business analytics department but is still awaiting a response. As such, Total Call hereby requests an extension to respond to this question.

Information Request #10: Confirm that Total Call will collect or otherwise contribute \$.08 per line per month to the Kentucky USF for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

Response to Information Request #10: Yes, Total Call will contribute \$.08 per line per month to the Kentucky USF for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

Witness: Hideki Kato, Chief Operating Officer, Total Call Mobile, Inc.

Information Request #11: Confirm that Total Call will collect or otherwise contribute \$.04 per line per month to the Kentucky Telecommunications Relay Service/Telecommunication Access Program Fund for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

Response to Information Request #11: Yes, Total Call will contribute\$.04 per line per month to the Kentucky Telecommunications Relay Service/Telecommunication Access Program Fund for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

Information Request #12: Confirm that Total Call will contribute to the Commercial Mobile Radio Service Emergency Telecommunications Fund pursuant to KRS 65.7:35.

Response to Information Request #12: Yes, Total Call will contribute to the Commercial Mobile Radio Service Emergency Telecommunications Fund pursuant to KRS 65.7:35.

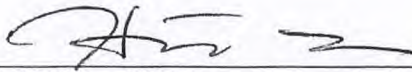
Witness: Hideki Kato, Chief Operating Officer, Total Call Mobile, Inc.

State of California)
)
County of Los Angeles)

Certification

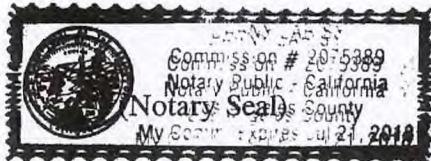
Hideki Kato, COO of Total Call Mobile, Inc., being first duly sworn on oath, deposes and states that he has read the Response to the Kentucky Public Service Commission Staff's First Request for Information to Total Call Mobile, Inc., and the answers made therein are true, correct and complete to the best of his knowledge and belief.

Dated: 10/24/2014



Hideki Kato, COO
Chief Operating Officer for Total Call Mobile
1411 W. 190th St., Suite 650
Gardena, CA 90248

Subscribed and sworn to before me this 24 day of October 2014.



Commission # 2075389



(Signature of person authorized to administer oath)

My Commission Expires: 7/21/2018

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COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TOTAL CALL MOBILE, INC.

Total Call Mobile, Inc. ("Total Call"), 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 on or before October 24, 2014. 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.

Total Call 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

6. Refer to page 7 of the Application, which states that Total Call has a 90-day non-usage policy. Explain how this complies with 47 C.F.R § 54.407 (c)(2), which requires a 60-day non-usage policy.

7. Refer to pages 14-15 of the Application, which detail how Total Call will advertise the availability of supported services. Provide further explanation describing Total Call's marketing plan and the inclusion of print, radio, and television advertisements, if any.

8. Refer to page 16 of the Application, which states that Total Call can provide service in every Zip Code in Kentucky. Provide maps or other documentation that demonstrate that Sprint PCS, the underlying carrier of Total Call, provides service in every Zip Code in Kentucky.

9. For each state in which Total Call has been designated as an Eligible Telecommunications Carrier for the purpose of offering Lifeline service, provide the percentage of Lifeline customers as compared to total customers in each state.

10. Confirm that Total Call will collect or otherwise contribute \$.08 per line per month to the Kentucky USF for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

11. Confirm that Total Call will collect or otherwise contribute \$.04 per line per month to the Kentucky Telecommunications Relay Service/Telecommunication Access Program Fund for each Total Call Kentucky customer, both Lifeline and non-Lifeline.

Robert Yap
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