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DEC 18 2014

PUBLIC SERVICE
COMMISSION

December 17, 2014

Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0615

Re: Application of Total Call Mobile, Inc. for Limited Designation as an Eligible
Telecommunications Carrier
Case No. 2014-00268

Dear Mr. Derouen:

Enclosed please find:

1. An original and ten copies of Total Call's Responses to Staff's First Request for Information; and

2. An original and ten copies of Total Call's Motion to File Under Seal Responses to Staff's First Request for Information pursuant to 807 KAR 5:001, Section 13(2). Pursuant to 807 KAR 5:001, Section 13(2)(a)(3), the confidential information is being submitted in a separate sealed envelope marked confidential. Please contact me if you have any questions regarding this filing.

Sincerely yours,

Mark S. Yurick

Mark S. Yurick *by Kelly Kumpke*

MSY
Enclosures

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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 hereby submits a Lifeline rate plan comparison chart as Attachment A.

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: **CONFIDENTIAL AND PROPRIETARY.** Total Call hereby submits as Attachment B the proposed marketing plan for providing Lifeline service in Kentucky. This confidential document has been filed under seal with the Commission.

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 amends its statement that Total Call can provide service in every Zip Code in Kentucky. According to the Kentucky coverage maps produced by Sprint PCS, Total Call's underlying provider, Sprint PCS does not provide service in every Zip Code in Kentucky. Total Call can, however, provide service anywhere that Sprint PCS has coverage.

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: **CONFIDENTIAL AND PROPRIETARY.** Total Call hereby submits as Attachment C a comparison of its legacy wireless customers versus Lifeline customers in all active states. This confidential document has been filed under seal with the Commission.

ATTACHMENT A

	Total Call Mobile Plans				Virgin Mobile Plans			Budget Prepay Mobile Plans				
	Total Call Option 1: 250 (Lifeline)	Total Call Option 2**: 1000 Talk & 1000 Text	Total Call Option 3**: Unlimited Talk & Text	Total Call Option 4**: Unlimited Talk, Text & Data	Assurance Wireless (Lifeline)	Assurance Wireless \$5 Talk & Unlimited Text (Lifeline)	Assurance Wireless \$30 Unlimited Talk, Text + Web (Lifeline)	Budget Prepay 250 (Lifeline)	Budget Prepay 350 (Lifeline)	Budget Prepay 500 (Lifeline)	Budget Prepay 1000 (Lifeline)	Budget Prepay Unlimited (Lifeline)
Basic Plan Minutes (allowance)	250	1000	unlimited	unlimited	250	500	unlimited	250	350	500	1000	unlimited
Texts included	1 Text = 1 min	1000	unlimited	unlimited	unlimited	unlimited	unlimited	250	unlimited	unlimited	unlimited	unlimited
Data included	0	0	0	unlimited	0	0	unlimited	0	50 MB	250 MB	400 MB	500 MB
Cost to Lifeline Eligible Customer	\$ 10.00	\$ 9.99	\$ 19.99	\$ 29.99	\$ -	\$ 5.00	\$ 30.00	\$ -	\$ 5.00	\$ 10.00	\$ 20.00	\$ 30.00

ATTACHMENT B

**CONFIDENTIAL – FILED UNDER
SEAL**

ATTACHMENT C

**CONFIDENTIAL – FILED UNDER
SEAL**

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF TOTAL CALL MOBILE,)
INC. FOR LIMITED DESIGNATION AS)
AN ELIGIBLE TELECOMMUNICATIONS)
CARRIER)

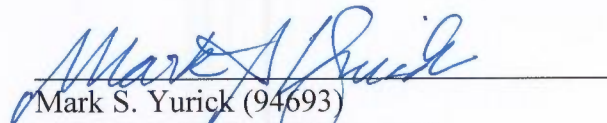
CASE NO.
2014-00268

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

Pursuant to 807 KAR 5:001 Section 13 and KRS 61.878, Total Call Mobile, Inc. ("Total Call"), respectfully requests confidential treatment of a portion of its Responses to The Kentucky Public Service Commission Staff's First Request for Information. The basis for this motion is provided in the attached memorandum in support.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Pursuant to 807 KAR 5:001 Section 13 and KRS 61.878, Total Call Mobile, Inc. (“Total Call”), respectfully requests confidential treatment of a portion of its Responses to Kentucky Public Service Commission Staff’s First Request for Information. In its First Request for Information, Staff requested an “explanation describing Total Call’s marketing plan and the inclusion of print, radio, and television advertisements.” (Information Request 7) Staff also requested that Total Call provide information describing the percentage of Lifeline customers as compared to total customers in each state that Total Call is designated as an Eligible Telecommunications Carrier for the purpose of offering Lifeline service. (Information Request 9) In response to these requests, Total Call is providing two documents: (1) its proposed marketing plan for providing Lifeline service in Kentucky (Attachment B of Total Call’s responses) and (2) a comparison of its legacy wireless customers versus Lifeline customers in all active states (Attachment C of Total Call’s responses) (collectively referred to as the “Confidential Information”).

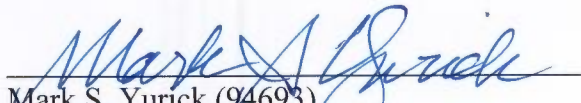
Pursuant to 807 KAR 5:001 Section 13(2), Total Call requests confidential treatment of its Confidential Information because these business planning and marketing strategies were created, and are kept, for internal company use. Total Call has expended a substantial amount of money and effort to develop this information, and this type of information is generally recognized as confidential or proprietary. If this Confidential Information is disclosed, existing and potential competitors could use this information to gain an unfair and undeserved competitive advantage.

807 KAR 5:001 Section 13(2)(a)(3)(b) states that “[i]f confidential treatment is sought for an entire document, written notification that the entire document is confidential may be filed

with the document in lieu of the required highlighting.” Total Call contends that all of the information in Attachment B and C is confidential. Disclosure of any portion of this information would provide existing and potential competitors with an unfair and undeserved competitive advantage by allowing them to have access to information that Total Call does not make available to the public.

807 KAR 5:001 Section 13(2)(a)(2)(b) states the motion for confidential treatment must state the time period for the material to be treated as confidential and the reasons for this time period. Total Call requests that the Confidential Information be protected as confidential for an indefinite period of time. Although Total Call contends that the Confidential Information is highly sensitive, and will continue to be so for a period of time, how long this information will remain confidential is currently unknown. Therefore, providing confidential treatment to Total Call for an indefinite period of time is reasonable.

Respectfully submitted,


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