

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S SECOND 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 April 17, 2015. 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 Total Call fails or refuses to furnish all or part of the requested information, Total Call

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. 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 filing a paper containing personal information, Total Call shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Describe the protocols implemented by Total Call to prevent customers from obtaining duplicate Lifeline services in violation of the Federal Communication Commission's ("FCC") rules permitting only one Lifeline service per household set forth in 47 C.F.R. § 54.409-54.410.

2. Describe Total Call's procedures to ensure that its agents, contractors or representatives adhere to the duplicate-service-prevention protocols implemented by Total Call.

3. Describe the fraud-prevention protocols implemented by Total Call to ensure applicant eligibility for Lifeline services pursuant to FCC rules set forth in 47 C.F.R. § 54.409-54.410.

4. Describe Total Call's procedures to ensure that its agents, contractors or representatives adhere to the fraud-prevention protocols implemented by Total Call.

5. Have any conditions been attached to Total Call's Lifeline ETC designation by any state regulatory agency? If so, describe the conditions imposed and identify the state commission and case number.

6. Has Total Call ever been cited by the FCC for providing duplicative Lifeline services to a customer? If so, provide the file number and date of the citation and order.

7. Has Total Call ever been investigated by the FCC for providing duplicative Lifeline services to a customer? If so, provide the file number and investigation outcome.

8. Has Total Call ever been cited by the FCC for providing Lifeline services to an ineligible customer? If so, provide the file number and date of the citation and order.

9. Has Total Call ever been investigated by the FCC for providing Lifeline services to an ineligible customer? If so, provide the file number and date of the citation and order.



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Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

**MAR 19 2015**

DATED \_\_\_\_\_

cc: Parties of Record

Case No. 2014-00268

\*Total Call Mobile, Inc.  
1411 W 190th Street, Suite 700  
Gardena, CA 90248

\*Robert Yap  
Chief Legal Officer  
1411 W. 190th Street, Suite 700  
, CALIFORNIA 90248

\*Mark S Yurick  
Taft Stettinius & Hollister, LLP  
65 E. State Street, Suite 1000  
Columbus, OHIO 43215