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PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF SI WIRELESS, LLC)
TO RELINQUISH ITS (HIGH COST)) **CASE NO. 2019- 00385**
ELIGIBLE TELECOMMUNICATIONS)
CARRIER DESIGNATION)

NOTICE - APPLICATION

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, SI Wireless, LLC. (“SI Wireless”) gives notice to the Kentucky Public Service Commission (“Commission”) of its intent to relinquish its designation as an eligible telecommunications carrier (“ETC”) for high cost eligibility, effective January 6, 2020, and applies for approval of this relinquishment. The proposed relinquishment will have minimal impact because SI Wireless currently serves a limited number of subscribers, alternative service providers presently provide this service in the areas of Kentucky in which SI Wireless serves, and existing subscribers will have ample time to transition to another service provider.

In support of its Application, SI Wireless provides the following:

General Information

1. The full name and post office address of SI Wireless is: 1275 N. Reed Station Road, Carbondale, Illinois 62901. Its e-mail address is: accounting@mymobilenation.com.
2. SI Wireless is a limited liability company organized on February 28, 2009 under the laws of Illinois. It is presently in good standing in the state of Illinois and is authorized to transact business in the Commonwealth of Kentucky.
3. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

Jason Narrell
SI Wireless, LLC dba Mobile Nation
1275 N. Reed Station Road
Carbondale, IL 62901
(731) 602-6013
jnarrell@mymobilenation.com

Gerald E. Wuetcher
Stoll Keenon Ogden PLLC
300 West Vine Street, Ste 2100
Lexington, KY 40507-1801
(859) 231-3017
gerald.wuetcher@skofirm.com

4. SI Wireless (SAC 269036) was designated as an ETC by the Kentucky Public Service Commission in Case No. 2012-00145.¹ SI Wireless was required to seek high cost designation in order to participate in a Federal Communications Mobility Fund Auction, for which SI received no high cost funds. SI Wireless requests to relinquish this authority.² The wire centers affected by the proposed relinquishment are listed in Exhibit A to this Application.

Request to Relinquish ETC Designation

5. Federal law specifies that the Commission “shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier.”³ The federal requirements for relinquishment of ETC designation can be summarized as the following: (1) there must be more than one ETC serving in the area of the ETC seeking relinquishment; (2) the ETC seeking relinquishment must provide advance notice to the relevant public service commission; (3) the subscribers served by the relinquishing ETC must continue to be served by an ETC; and (4) to

¹ *Application of SI Wireless For Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky*, Case No. 2012-00145 (Ky. PSC June 25, 2012).

² The Universal Service Administrative Company (“USAC”) has assigned SI Wireless study area code (“SAC”) 269036 for wireless services. SI Wireless will ask USAC to cancel this SAC upon approval of this request by the Commission. SI Wireless has not previously applied for or received Federal Universal Service high-cost support.

³ 47 U.S.C. § 214(e)(4).

the extent that additional facilities are required to serve any of the relinquishing ETC's customers, sufficient notice shall be provided to ensure that the construction or purchase can be timely completed.⁴

6. SI Wireless's ETC service area is served by more than one ETC, including multiple alternative wireless ETCs. Because at least one other ETC serves SI Wireless's ETC service area, federal law provides that the Commission should permit SI Wireless to relinquish its high cost ETC designation.

7. Consistent with 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a), SI Wireless is filing this notice more than a month in advance of the requested effective date of relinquishment of its ETC designation.

8. To the best of SI Wireless's knowledge, SI Wireless's Lifeline subscribers will have at least one alternative ETC from which to choose. Thus, all low-income consumers residing in SI Wireless's ETC service area will continue to be served by an ETC consistent with 47 U.S.C. § 214(e).

9. To the best of SI Wireless's knowledge, none of the remaining ETCs will be required to purchase or construct additional facilities to continue to serve consumers within the applicable service area.

10. SI Wireless's proposed ETC relinquishment is consistent with the public interest. The services offered by SI Wireless are available from other wireline and wireless providers in the Commonwealth, including TracFone Wireless, Q Link Wireless, and the incumbent LECs serving SI Wireless's ETC area. Consequently, SI Wireless's subscribers will not be unduly harmed as they will be able to transition to new providers and continue to receive Lifeline discounts.

⁴ See 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a).

11. SI Wireless will ensure that its subscribers have ample time to find a new service provider in a thoughtful and informed manner. No later than November 7, 2019, SI Wireless will provide to affected customers written notice via U.S. mail of its intent to cease service as of January 6, 2020.⁵ A copy of the proposed notice is attached as Exhibit B to this Application. This action will provide Lifeline customers sixty (60) days' notice, which equals or exceeds the amount of notice that other carriers in Kentucky relinquishing their ETC designations have provided to their customers.⁶ SI Wireless also will provide a text message reminder at least once to the remaining customers during the 60-day notice period. The notice will clearly indicate that the subscriber must make arrangements with another carrier to avoid loss of service and will provide a toll-free telephone number to contact SI Wireless's customer service representatives for assistance with this transition.

12. Consistent with other recent ETC relinquishments that the Commission has approved,⁷ SI Wireless will largely⁸ cease to enroll new Lifeline subscribers from the date of this filing going forward.

13. SI Wireless requests that the Commission advance this Application to the top of its docket and issue a decision no later than **November 7, 2019** to permit SI Wireless sufficient time to adequately notify its Lifeline subscribers and to ensure an orderly transition.

⁵ According to the most recent Universal Service Administrative Company data, SI Wireless had 413 Lifeline customers in Kentucky as of July 2019.

⁶ See, e.g. *Request of Budget Prepay, Inc. to Relinquish Eligible Telecommunications Carrier Designation*, Case No. 2017-00166 (Ky. PSC Apr. 25, 2017) (30 days); *Application of Cricket Communications, LLC For A Commission Order Granting Relinquishment of Its Designations As A Lifeline-Only Eligible Telecommunications Carrier* Case No. 2015-00135 (Ky. PSC May 14, 2015) (45 days); *Petition of Cincinnati Bell Wireless, LLC For Relinquishment of Eligible Telecommunications Carrier Designation*, Case No. 2014-00140 (Ky. PSC May 16, 2014) (45 days).

⁷ See, e.g., *Cricket Communications, LLC* ¶ 2; *Cincinnati Bell Wireless, LLC* at 2.

⁸ SI Wireless may continue to process enrollments in some cases but reserves the right not to conduct any new enrollments going forward.

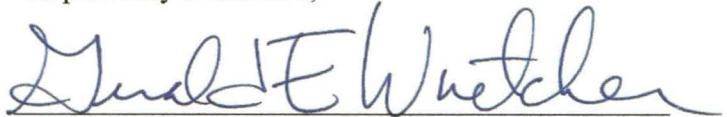
Conclusion

WHEREFORE, SI Wireless, LLC requests that the Commission:

1. Enter an Order approving SI Wireless's proposed relinquishment of its designation as an ETC for high cost eligibility effective January 6, 2020;
2. Place this Application at the top of its docket and enter an Order on the Application but no later than **November 7, 2019**; and,
3. Grant any and all such other relief to which SI Wireless may be entitled.

Dated: October 15, 2019

Respectfully submitted,



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Counsel for SI Wireless, LLC

EXHIBIT A

AFFECTED WIRE CENTERS

265182 - BellSouth Telecommunications, LLC dba AT&T Kentucky - KY

| | | | | |
|-----------|----------|----------|----------|----------|
| FLTNKYMA | FRDNKYMA | SEBRKYMA | SLGHKYMA | STRGKYMA |
| GBVLKYMA | HANSKYMA | HCMNKYMA | LFYTKYMA | MARNKYMA |
| MDVIKYMA | MGFDKYMA | MRRYKYMA | MYFDKYMA | NEBOKYMA |
| PDCKKYIP | PDCHKYLO | PDCKKYMA | PDCHKYRL | AURRKYMA |
| BNTNKYMA | PRTNKYES | PRVDKYMA | CADZKYMA | CLAYKYMA |
| CLTNKYMA | CNTNKYMA | DIXNKYMA | DWSPKYMA | EDVLKYMA |
| UNCYTNMA* | | | | |

*Only to the extent this exchange is located in Kentucky

260396 - Ballard Rural Telephone Cooperative Corporation, Inc.

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|----------|----------|----------|----------|----------|
| BNDNKYXA | BRLWKYXA | GAGEKYXA | HETHKYXA | KEVLKYXA |
| LACTKYXA | WCKLKYXA | | | |

260417 - Salem Telephone Company

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|----------|--|--|--|--|
| SALMKYXA | | | | |
|----------|--|--|--|--|

260421 - West Kentucky Rural Telephone Cooperative Corporation, Inc.

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|----------|----------|----------|----------|----------|
| CNHMKYXA | FLDLKY01 | FNFMKYXA | FRNGKYXA | FRTNKYXA |
| HAZLKYXA | HRDNKYXA | KRKSXYXA | LOWSKYXA | LYGVKYXA |
| LYVLKYXA | NWCNKYXA | SDLIKYXA | WINGKYXA | WPLNKYXA |

260691 - Windstream Kentucky East, Inc. - London

| | | | | |
|----------|----------|----------|----------|----------|
| ARTNKYXA | BRWLKYXA | CLCTKYXA | CLMBKYXA | MLBNKYXA |
| SMLDKYXA | | | | |

EXHIBIT B

11/7/2019

Name

Address

City, St Zip

MobileNation will no longer provide Lifeline Benefits in Kentucky, as of 1/6/2020.

How does this impact you? If you would like to keep a Lifeline discount you will need to contact a Lifeline provider in your area. Here is a list of providers that may offer a Lifeline discount in your State – you can contact the providers directly to find which ones provide service in your area.

- Ballard Rural Telephone Coop
- AT&T
- Access Wireless
- Q Link Wireless
- Safelink Wireless
- Life Wireless
- Easy Wireless
- Tag Mobile
- Boomerang Wireless
- Amerimex Communications
- Air Voice Wireless
- TruConnect
- Assurance Wireless
- StandUP Wireless

Or you can go to <https://nationalverifier.service-now.com/lifeline> to find a list of Line providers in the city/town near you. You can also contact the Universal Service Administrative Company (USAC) at LifelineProgram@usac.org or 800.234.9473 for a list of Lifeline providers in your state or to ask general questions about Lifeline.

If you have any questions please call us at 877.732.2147 to speak with someone from Member Support or check with your local MobileNation store.

Sincerely,

MobileNation Lifeline Support