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Public Service
Commission

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October 14, 2016

Talina R. Matthews
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40601

RE: Notification of Boomerang Wireless, LLC d/b/a enTouch Wireless and Total Call Mobile Regarding a Transfer of Customers

Dear Ms. Matthews:

Boomerang Wireless, LLC (Boomerang or the Company) and Total Call Mobile (Total Call and, together with Boomerang, the Parties) hereby notify the Kentucky Public Service Commission (Commission) of their intention to transfer several Total Call wireless Lifeline customers to Boomerang (the Transaction). For the Commission's records, the Parties provide the following information:

I. THE PARTIES

A. BOOMERANG WIRELESS, LLC D/B/A ENTOUCH WIRELESS (BOOMERANG)

Boomerang is a limited liability company located at 955 Kacena Rd. Suite A, Hiawatha, IA 52233. The Company provides prepaid wireless services to customers in twenty-four states, including in Kentucky.¹ Boomerang is registered with the Commission to provide wireless service under utility ID 4107600. The Company has been designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireless basis in 27 states, currently serving approximately 260,000 Lifeline customers throughout its operating territory. Boomerang was designated by the Commission as an ETC to provide Lifeline services on a wireless basis on January 22, 2013 in Case No. 2012-00422.

¹ Boomerang also holds international Section 214 authority from the Federal Communications Commission (FCC).

B. TOTAL CALL MOBILE (TOTAL CALL)

Total Call, a California corporation, is headquartered at 1411 W 190th St, Suite 700, Gardena, CA 90248. Total Call provides wireless services throughout the United States, including in Kentucky. Total Call is registered with the Commission to provide wireless service under utility ID 4103900. Total Call has been designated as an ETC to provide Lifeline services to low-income consumers on a wireless basis in numerous states and Puerto Rico. The Commission designated Total Call as an ETC to provide wireless Lifeline services on July 20, 2015 in Case No. 2014-00268.

II. DESIGNATED CONTACTS

Correspondence or other materials concerning this Notification should be directed to:

Joshua T. Guyan
Kelley Drye & Warren LLP
3050 K Street NW, Suite 400
Washington, D.C. 20007
Tel: (202) 342-8566
Fax: (202) 342-8451
Email: jguyan@kelleydrye.com

William K. Mosca, Jr.
Bevan, Mosca & Giuditta, P.C.
222 Mt Airy Road, Suite 200
Basking Ridge, NJ 07920
Tel: (908) 753-8300
Fax: (908) 753-6423
Email: wmosca@bmg.law

with a copy to:

Kimberley Lehrman
Boomerang Wireless LLC
President
955 Kacena Road, Suite A
Hiawatha, Iowa
52233
FAX: 319.743.1293
EMAIL: klehrman@readywireless.com

Saturo Manabe
President/CEO
Total Call Mobile
1411 W 190th Street
Suite 700
Gardena, CA 90248
EMAIL: saturo.manabe@kddia.com

III. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of a Customer Transfer Agreement dated October 12, 2016, (the Agreement), Total Call intends to transfer approximately four wireless customers in Kentucky to Boomerang. These Customers currently receive local exchange and long distance wireless Lifeline services from Total Call. Boomerang will not assume any of Total Call's pre-closing liabilities or obligations.

To ensure a seamless transition and avoid customer confusion or inconvenience, the Parties will provide affected customers with notice at least ten (10) days prior to the transfer, using a form notice substantially similar to the one attached as **Exhibit 1**.

III. PUBLIC INTEREST ANALYSIS

The proposed Transaction is in the public interest.² Upon consummation, the transferred customers will continue to receive high-quality competitive local exchange and interexchange wireless Lifeline services, now delivered by Boomerang. Following consummation of the Transaction, Boomerang will provide the transferred Lifeline customers with services that are improved compared to the plans they currently enjoy on the same underlying wireless network (i.e., acquired customers currently on the Sprint Wireless network will remain on that network). In Kentucky Boomerang offers a 500 minutes voice + 100 text + 10 MB plan to which the consumers will be upgraded on their existing phones. This plan also meets the new voice minimum service standard as defined by the FCC's Lifeline Modernization Order,³ which will be effective December 2, 2016. The consumer will not have to go through an additional plan change in December. Moreover, because these customers will continue to be served utilizing the same underlying network, they will be able to continue using the same handsets and will enjoy access to the same coverage area.

The Transaction has no adverse effects for the transferred Customers, who will receive notice in advance of the proposed transfer and may choose to remain with Boomerang or change to a new provider. Total Call and Boomerang will work together to ensure that the affected Customers experience a smooth, virtually seamless, transition.

IV. CONCLUSION

The Parties respectfully request that the Commission note the Transaction for its records. Please contact the undersigned if there are any questions regarding this filing.

Sincerely yours,



Douglas F. Brent
Counsel for Boomerang Wireless, LLC

DFB
Enclosure

² The transaction is not subject to any Commission regulation related to carrier changes. See KRS 278.535(1)(a); KRS 278.54611.

³ See *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38 (Apr. 27, 2016) (Lifeline Modernization Order).

EXHIBIT 1

Sample Customer Notice



<First_Name> <Last_Name>
<Address 1>
<Address 2>
<City>, <State> <Zip>

[DATE]

**RE: YOUR LIFELINE PHONE SERVICE
PLEASE READ!**

Dear <First_Name>:

We are pleased to share some exciting news about your wireless Lifeline services. On or shortly after [DATE] your wireless Lifeline phone service, currently provided by Total Call Mobile will be provided by Boomerang Wireless, LLC d/b/a enTouch Wireless. enTouch Wireless is a national provider of wireless services to Lifeline customers. For more information about the company go to www.enTouchwireless.com.

Assuming that you continue to qualify to receive Lifeline service, enTouch Wireless will provide the high level of customer service you expect and have received from Total Call Mobile. We will make the change as seamless as possible. Your service will continue to be provided utilizing the same nationwide network. Following the changeover, you will continue to be enrolled to receive wireless Lifeline-discounted services.

No action on your part is required.

You will continue to use the same phone and telephone number you currently have. There will be no fees related to the transfer of your service to enTouch. Following the transfer enTouch will provide you with the following wireless Lifeline services each month:

- **500 voice minutes**
- **100 texts**
- **10 MB of data**

You will still receive this service at no charge. The Top-Up plans now available from Total Call will also still be available. enTouch will send you notices of any future changes to the rates, terms and conditions of your service that are required by law.

You will be notified by enTouch via text message once your service is transferred.

Questions or concerns? Call enTouch at any point at 866.488.8719 or, prior to the transfer, you may also call Total Call Mobile at 1-800-661-7391.

We look forward to serving you!

Sincerely,

Kimberley Lehrman
President
Boomerang Wireless, LLC d/b/a enTouch Wireless
Customer Service: 866.488.8719

Hideki Kato
COO
Total Call Mobile
Customer Service: 1-800-661-7391



1411 W. 190th Street
Ste. 650
Gardena, CA 90248

**OPEN NOW!
IMPORTANT NOTICE
ABOUT YOUR PHONE
SERVICE.**

<First_Name> <Last_Name>
<Address 1>
<Address 2>
<City>, <State> <Zip>