

**KENTUCKY PUBLIC SERVICE COMMISSION
TAG MOBILE, LLC'S ("TAG MOBILE" OR "TAG") RESPONSES
CASE NUMBER 2016-0059 EXECUTIVE ORDER 2020-215**

Question 1

Responder: Robert Yaquinto, Jr.
Trustee in Bankruptcy for TAG Mobile, LLC
TAG Mobile, LLC
701 E. Plano Parkway, Suite 408
Plano, TX 75074
(214) 942-5502
rob@syllp.com

Question: State whether the ETC has experienced an increase over the past 45 days in usage of voice minutes and data for Lifeline customers in Kentucky. If so, provide the increase over the monthly usage average.

Response: TAG shows no increase of data usage for Kentucky subscribers in the past 45 days. TAG currently provides subscribers in Kentucky unlimited voice calling with their Lifeline plan.

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Question 2

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Question: For January and February 2020, provide the percentage of Lifeline customers that exceeded the monthly 1,000 voice minutes or 3 GB of data. Provide the same information for March and April 2020.

Response: TAG records show that no Kentucky subscribers exceeded their allotted 3 GB of data in January, February, March and April 2020. TAG currently provides subscribers in Kentucky unlimited voice calling with their Lifeline plan.

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Question 3

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Question: State whether the ETC is providing additional minutes and data in response to the current state of emergency. If the ETC is providing the additional services, state when the ETC is planning to cease providing the additional services.

Response: Starting on March 17, 2020, TAG Mobile, LLC began providing an additional 5 GB of data for a total of 8 GB of data for all Kentucky Lifeline subscribers each month through May 17, 2020.

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Question 4

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Question: State whether the ETC would be willing to provide unlimited voice in Kentucky if additional reimbursement from the KUSF was made available to the ETC for providing unlimited voice.

Response: TAG Mobile, LLC currently provides subscribers in Kentucky unlimited voice calling, as well as unlimited texts with their Lifeline plan.

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Question 5

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Question: State whether the ETC would be willing to provide additional data in Kentucky if additional reimbursement from the KUSF was made available to the ETC for providing additional data. If so, state the amount of additional data the ETC could provide and the cost to provide the data.

Response: TAG Mobile is willing to increase our Lifeline offering to 4GB of data if we are able to acquire an additional \$11.35 each month for a total of \$14.85 from the KUSF, increasing our current offering by 1 GB of data each month. If the KUSF is willing to provide TAG Mobile with a one-time reimbursement of \$39.00 for each new subscriber, TAG would be able to provide an upgraded Smartphone, which has Mobile WiFi Hotspot capability for those subscribers.

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Question 6

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Question: If the ETC provided unlimited voice or increased data, state how soon the ETC could implement the increase in services.

Response: TAG is able to implement any increase in services within one week. Also, please see TAG's response to Question 8.

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Question 7

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Question: State whether there is a minimum time the additional temporary KUSF support and Lifeline services should continue to provide a tangible public health benefit.

Response: TAG Mobile believes that there is no minimum time additional temporary support should continue. TAG believes that additional services should remain in place until the ramifications of the pandemic have been controlled and the state unemployment rate is back to pre-pandemic levels.

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Question 8

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Question: Provide any information regarding this inquiry that will assist the Commission in its inquiry including its experience from other jurisdictions.

Response: TAG Mobile has been hindered by the FCC's Fifth Report and Order, Memorandum Opinion and Order, Order on Reconsideration, and FNPRM, released on November 14, 2019, which limits how ETC carriers are able to pay in-person enrollment agents. These rules have made TAG's ability to use in-person enrollment agents in Kentucky impossible. This severely limits potential Lifeline subscribers from easy access to Lifeline service as they are unable to complete their enrollment in-person and must rely on internet access to place their orders for Lifeline.