

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the matter of:

AN INQUIRY INTO THE STATE	)	CASE NO.
UNIVERSAL SERVICE FUND	)	2016-00059

**EAST KENTUCKY NETWORK, LLC D/B/A APPALACHIAN WIRELESS'S  
RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO ALL PARTIES OF RECORD**

East Kentucky Network, LLC d/b/a Appalachian Wireless (“Appalachian Wireless”) hereby submits its responses to the information requests of the Public Service Commission Staff, dated April 6, 2016. W.A. Gillum is the witness responsible for responding to the questions related to the information provided in each of the responses.

**Requests for Information to Parties that Received Payment  
from the Kentucky Universal Service Fund (“KUSF”)**

1. Provide the KUSF reimbursement forms submitted to the Commission and the Department of Finance and Administration from January 2014 to the present.

**RESPONSE: Please see the forms attached hereto collectively as Exhibit A.**

2. Provide the Federal Communication Commission (“FCC”) Form 497 submitted to the FCC from January 2014 to the present.

**RESPONSE: Please see the forms attached hereto collectively as Exhibit B.**

3. Refer to the Lifeline plans you filed with the Commission with your Application for Designation as an Eligible Telecommunications Carrier (“ETC”). State whether there have been any changes to these Lifeline plans since the Commission entered an Order designating you as an ETC

for the purpose of offering Lifeline service in Kentucky. If there have been changes to the Lifeline plans, provide:

- a. Copies of all Lifeline plans currently offered to Kentucky subscribers.
- b. For each new or modified Lifeline plan, explain in detail:
  1. How the current Lifeline plan modifies the Lifeline plan in effect when you were designated as an ETC.
  2. Whether the current Lifeline plan was offered in addition to Lifeline plans in effect when you were designated as an ETC.
- c. An explanation for why existing Lifeline plans were changed or additional Lifeline plans were added.

**RESPONSE: There have not been any changes to the Lifeline plan since inception. The plan offered by Appalachian Wireless is local unlimited voice with roaming and long distance restrictions.**

4. If the Commission's decision is to maintain state Lifeline support for only voice service, describe how that decision would affect whether and how you provide Lifeline service in Kentucky.

**RESPONSE: It would have no effect.**

5. Identify any cost-effective procedures that you believe should be implemented by the Commission to increase oversight in the Lifeline program.

**RESPONSE: See, the *Testimony of W.A. Gillum on behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless*, which was previously filed in this matter on March 7, 2016.**

6. If the Commission's decision is to change the amount of Lifeline support, state how soon upon issuance of an Order by the Commission changing the Lifeline support amount that you are or anticipate being able to implement the changes on customer bills.

**RESPONSE: Appalachian Wireless believes that it would be entitled to implement any change immediately. However, as a courtesy to Lifeline customers and subject to obtaining leave from the Commission, Appalachian Wireless would prefer to defer the change for one billing cycle in order to provide all customers with notice prior to decreasing the support.**

7. Provide, in detail, the methods employed to verify the eligibility of customers who participate in the Lifeline program.

**RESPONSE: Appalachian Wireless requires potential Lifeline customers to complete a Lifeline Certification Form and a Lifeline Household Worksheet. Appalachian Wireless also requires that potential Lifeline customers provide proof of participation in a qualifying program or proof of income qualification. Appalachian Wireless also queries the National Lifeline Accountability Database ("NLAD") and enrolls the customer in the NLAD.**

8. State whether you have been subjected to FCC investigation, action, and/or penalties relating to participation in the Lifeline program. If you have been so subjected, provide in detail, including citations to the FCC action, the investigation, action, and/or penalties to which you were subjected.

**RESPONSE: No.**

9. Describe, in detail, your current marketing programs for Lifeline service in Kentucky, including but not limited to, person-to-person sales.

**RESPONSE: Appalachian Wireless has a promotional poster concerning the Lifeline plan, which is sent to the Food Stamp offices in Appalachian Wireless's coverage areas for display. New posters are sent to the Food Stamp offices approximately every six months. Appalachian Wireless also has information about the Lifeline plan available on its website. Appalachian Wireless also provides public notice by publication in approximately twenty-two different newspapers each quarter.**

**Requests for Information to All Parties**

1. Provide the KUSF reimbursement forms submitted to the Commission and the Department of Finance and Administration from January 2014 to the present.

**RESPONSE: Please see the forms attached hereto collectively as Exhibit A.**

2. Explain how the total number of subscriber lines is calculated for the KUSF reimbursement form when a new customer receives service in the middle of a month.

**RESPONSE: Appalachian Wireless does not prorate the Lifeline subsidy. The customer's credit for the KUSF Lifeline subsidy applies on the customer's first full billing cycle. The number of subscriber lines reported on the KUSF reimbursement form is equal to the number of customers who received a Lifeline credit on their respective bills in the prior month.**

3. Explain how the total number of subscriber lines is calculated for the KUSF reimbursement form when a customer leaves in the middle of a month.

**RESPONSE: If the customer's last bill issued in the one-month period prior to the report date had a credit for Lifeline support, they would be reported on the reimbursement form. There is no proration of the subsidy on the customer's final bill. The entire subsidy**

**amount would be applied to reduce the customer's prorated balance on the customer's final bill.**

4. Explain how the KUSF surcharge remittance is calculated when you experience a bad debt. Explain whether none of the surcharge amount or the full surcharge amount billed to, but not paid by, the customer is remitted.

**RESPONSE: The full amount of surcharge billed is remitted, regardless of whether or not it is paid by the customer.**

5. State whether you believe the Commission should wait until the FCC's investigation of Lifeline Reform is conducted before rendering a decision in this proceeding, and explain the basis for your response.

**RESPONSE: Appalachian Wireless takes no position.**

6. State how soon upon the issuance of an Order by the Commission changing the KUSF surcharge that you are or anticipate being able to implement the changes on customer bills. If it differs by type of account, provide the information for each type of account, along with the number of access lines for each account type.

**RESPONSE: Appalachian Wireless believes that it could institute an increased surcharge on all accounts immediately.**

Respectfully submitted on April 27, 2016.

*Cindy D. McCarty*

Cindy D. McCarty  
Staff Attorney

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In the matter of:

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**CERTIFICATION**

STATE OF KENTUCKY

COUNTY OF FLOYD

W.A. Gillum, being duly sworn, states that he has supervised the preparation of *East Kentucky Network, LLC d/b/a Appalachian Wireless's Responses to Commission Staff's First Request for Information to All Parties of Record* in the above-referenced matter, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

*W.A. Gillum*

W.A. Gillum

Subscribed and sworn to before me on this 26<sup>th</sup> day of April, 2016.



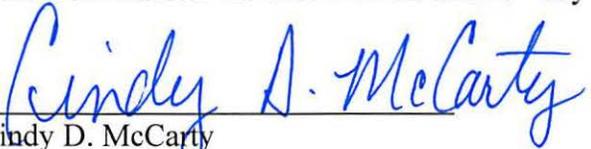
*Raina L. Helton*

Notary Public

My Commission Expires: Feb 10, 2020

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing, *East Kentucky Network, LLC d/b/a Appalachian Wireless's Responses to Commission Staff's First Request for Information to All Parties of Record*, is a true and accurate copy of the document being filed in paper medium; that the electronic filing was transmitted to the Commission on April 27, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing in paper medium is being mailed to the Commission via U.S. mail on this 27<sup>th</sup> day of April, 2016.

  
Cindy D. McCarty