

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

In the Matter of:

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

**EASY WIRELESS' SUPPLEMENTAL RESPONSE  
TO COMMISSION STAFF'S FIRST REQUESTS FOR INFORMATION**

Easy Telephone Services Company d/b/a Easy Wireless, hereby serves its Supplemental Response to the Kentucky Public Service Commission Requests for Information Nos. 3 and 8 dated April 6, 2016.

**DATA RESPONSES**

**REQUESTS FOR INFORMATION TO PARTIES THAT RECEIVED PAYMENT FROM THE KENTUCKY UNIVERSAL SERVICE FUND ("KUSF")**

**REQUEST NO. 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 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:

**RESPONSE:**

- a. **Effective January 1, 2017, Easy Wireless enhanced its Lifeline offer in Kentucky, as shown in this table:**

<b>Non-Tribal Lifeline:</b>	
750 Minutes + Unlimited Text + 25 MB High-Speed Data	\$0.00
750 Minutes + Unlimited Text + 250 MB High-Speed Data	\$1.00
Unlimited Minutes + Unlimited Text + 1,024 MB High-Speed Data	\$15.00
Unlimited Minutes + Unlimited Text + 2,048 MB High-Speed Data	\$25.00
Unlimited Minutes + Unlimited Text + 2,048 MB High-Speed Data + Unlimited Data at 2G speeds	\$26.00
Unlimited Minutes + Unlimited Text + 5,120 MB High-Speed Data + Unlimited Data at 2G speeds	\$40.00

- b.
  - i. **Easy Wireless was approved with a 100 minute plan for \$12.75. We also have retail plans and family plans. The retail plans are offered to Lifeline customers with a \$12.75 discount. The family plans are offered to customers that have at least one account (retail or Lifeline) with Easy already.**
  - ii. **The only plan offered when designated as an ETC was the 100 minute plan.**
- c. **Plans were changed to offer better products with more options to the eligible Lifeline customers in KY.**

**RESPONSIBLE WITNESS:** Tina C. Allen, Compliance Manager

**REQUEST NO. 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:**

**Easy Telephone Services Company d/b/a Easy Wireless (Easy or the Company) has been subjected to Federal Communication Commission (FCC) investigation and action relating to its participation in the Lifeline program. It has not been subjected to any penalties.**

**On September 30, 2013, the FCC issued a Notice of Apparent Liability for Forfeiture (NAL) (File No.: EB-IHD-13-00010590) to Easy alleging that Easy sought reimbursement from the universal service fund for intra-company duplicate subscribers. The NAL proposed a monetary forfeiture of \$1,586,545. Easy takes very seriously the issue of alleged intra-company duplicates raised in the NAL. We believed that the NAL was both misguided and unfounded, and on December 4, 2013, Easy submitted its response to the NAL seeking cancellation of the proposed forfeiture. Easy supplemented its response on August 4, 2014 to provide additional data in support of its positions.**

**On December 29, 2017, Easy and the FCC entered into a Consent Decree to resolve the investigation and the Consent Decree was adopted by Order (FCC 17-174). The proposed forfeiture was reduced to \$100,000 and Easy agreed to implement a compliance plan to ensure that it adheres to the FCC's rules.**

**RESPONSIBLE WITNESS:** Tina C. Allen, Compliance Manager

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that the January 10, 2018 electronic filing of these Data Responses is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on January 10, 2018; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of these Data Responses will be mailed to the Commission by first class United States mail, postage prepaid, on January 10, 2018.

  
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Douglas F. Brent