

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

**In the Matter of:**

**AN INQUIRY INTO THE STATE     )  
UNIVERSAL SERVICE FUND        )**

**CASE NO.  
2016-00059**

**TAG MOBILE, LLC'S RESPONSE TO COMMISSION STAFF'S SECOND REQUEST  
FOR INFORMATION**

TAG Mobile, LLC ("TAG") hereby serves its Responses to the Kentucky Public Service Commission Request for Information dated June 22, 2016.

**REQUEST NO. 1.** If not already provided in a previous response to a Commission Staff request for information, respond to the following:

- a. Provide the monthly Kentucky Universal Service Fund ("KUSF") forms<sup>1</sup> ("KUSF form") submitted to the Commission and the Department of Finance and Administration from January 2014 to the present.
- b. Explain how the total number of subscriber lines is calculated for the KUSF form when a new customer receives service in the middle of a month.
- c. Explain how the total number of subscriber lines is calculated for the KUSF form when a customer leaves in the middle of a month. Commission Staff's First Request for Information referred to these forms as "reimbursement" forms. In this request, Commission Staff is referring to the forms that the parties are to file monthly pursuant to the Commission's decision in *An Inquiry into Universal Service Funding Issues*, Administrative Case No. 360 (KY. PSC May, 22, 1998) (form last revised March 10, 2016). These forms are to be filed regardless of whether a party is seeking reimbursement from the KUSF.
- d. 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.
- e. State whether the KUSF surcharge billed to a customer is prorated if the customer has service for less than a full month.

**RESPONSE:**

- a. Please see TAG's Response to Staff's Initial Data Requests.

**RESPONSIBLE WITNESS:**

Mary Calderon, Vice President of Legal Regulatory, & Compliance

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<sup>1</sup> Commission Staff's First Request for Information referred to these forms as "reimbursement" forms. In this request, Commission Staff is referring to the forms that the parties are to file monthly pursuant to the Commission's decision in *An Inquiry into Universal Service Funding Issues*, Administrative Case No. 360 (Ky. PSC May, 22, 1998)(form last revised March 10, 2016). These forms are to be filed regardless of whether a party is seeking reimbursement from the KUSF.

**REQUEST NO. 2.** If no KUSF forms have been submitted to the Commission and the Kentucky Department of Finance and Administration from January 2014, to the present, explain why the KUSF forms have not been submitted.

- a.** If no KUSF forms have been submitted, state whether you collect the KUSF surcharge from your customers.
- b.** If you do not collect the KUSF surcharge from your customers, explain why the KUSF surcharge has not been collected.
- c.** If no KUSF forms have been submitted, state whether you remit the KUSF surcharge to the Kentucky Department of Finance and Administration.
- d.** If you do not remit the KUSF surcharge to the Kentucky Department of Finance and Administration, explain why the KUSF surcharge has not been remitted.

**RESPONSE:**

Not Applicable.

**RESPONSIBLE WITNESS:**

Mary Calderon, Vice President of Legal Regulatory, & Compliance

**REQUEST NO. 3.** Explain the anticipated impact, if any, that the FCC's recent *Lifeline Reform Order*<sup>2</sup> will have on the provision of Lifeline service in Kentucky, including, but not limited to, verifying eligibility of Lifeline customers; the potential provision of broadband service; and, the impact of the reduction of Federal Universal Service funding for voice service.

**RESPONSE:**

TAG anticipates harm to mobile voice consumers as a result of the FCC's Lifeline Reform Order. On the *provision of broadband*, TAG will need to diversify in order to compete with broadband. It causes uncertainty in the market place, as the proposed federal subsidies will favor broadband support. On *eliminating voice only*, customers will be mostly impacted in a negative manner. The Order is replacing voice with broadband without consideration of the entire Lifeline population as many elderly customers rely on Lifeline for voice communications. Lifeline is intended to serve all eligible subscribers not just for after-school needs.

**RESPONSIBLE WITNESS:**

Mary Calderon, Vice President of Legal Regulatory, & Compliance

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<sup>2</sup> See *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Connect America Fund*, WC Docket No. 10-90, *Third Report and Order*, *Further Report and Order*, and *Order on Reconsideration* (Rel. April 27, 2016). (“Lifeline Reform Order”).

**REQUEST NO. 4.** In light of the *Lifeline Reform Order*, explain how a reduction in the amount of, or elimination of, KUSF support would impact the provision of Lifeline service in Kentucky.

**RESPONSE:** Lifeline customers would receive fewer voice minutes without additional state funding. Eliminating state support may work against the policy goal of Universal Service, as low income voice-only consumers lose the opportunity to have affordable or no cost service.

**RESPONSIBLE WITNESS:** .

Mary Calderon, Vice President of Legal Regulatory, & Compliance

Respectfully Submitted,



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*Counsel for TAG Mobile, LLC*

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that the July 13, 2016 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 July 13, 2016; 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 July 13, 2016.

A handwritten signature in black ink, appearing to read 'Douglas F. Brent', with a long horizontal stroke extending to the right.

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Douglas F. Brent