

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

In the Matter of:

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

**TOTAL CALL MOBILE, INC.'S RESPONSES TO COMMISSION STAFF'S  
SECOND REQUEST FOR INFORMATION TO ALL PARTIES OF RECORD AND TO  
TOTAL CALL MOBILE, INC.**

Total Call Mobile, Inc. ("TCM") hereby serves its Responses to the Kentucky Public Service Commission Staff's Second Request for Information To All Parties of Record dated June 22, 2016 and Commission Staff's Second Request for Information To Total Call Mobile, Inc. dated June 22, 2016.

**DATA RESPONSES**

**REQUESTS FOR INFORMATION TO ALL PARTIES**

**REQUEST NO. 1(a)** Provide the monthly Kentucky Universal Service Fund (“KUSF”) forms submitted to the Commission and the Department of Finance and Administration from January 2014 to the present.

**RESPONSE:** Please see Exhibit A for the KUSF forms from January 2014 through June 2016.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**REQUEST NO. 1(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.

**RESPONSE:** Each active line during the month is counted as one line in the total number of subscriber lines.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**REQUEST NO. 1(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.

**RESPONSE:** Each active line during the month is counted as one line in the total number of subscriber lines.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**REQUEST NO. 1(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.

**RESPONSE:** Total Call is a prepaid provider and does not experience bad debt.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**REQUEST NO. 1(e)** State whether the KUSF surcharge billed to a customer is prorated if the customer has service for less than a full month.

**RESPONSE:** Total Call is a prepaid provider and does not issue bills.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**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.

**RESPONSE:** N/A. See Response to Request No. 1.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**REQUEST NO. 3** Explain the anticipated impact, if any, that the FCC's recent *Lifeline Reform Order* 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:** The changes outlined in the *Lifeline Reform Order*, specifically the increased minimum voice and data service standards and reduction of Federal Universal Service funding for voice, will increase the cost at which Total Call Mobile is able to offer service to Lifeline customers. Total Call Mobile is currently evaluating the economics of its potential offerings to determine the best offerings in light of the FCC's Lifeline reforms.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel



**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:** Although Total Call does not currently receive KUSF support, Total Call intends to propose an enhanced service plan, which would potentially make Total Call eligible for KUSF support. If the Commission were to reduce or eliminate the KUSF support provided to ETCs, Total Call would have to reevaluate the economics of its potential enhanced offering to determine if such an offering is feasible, particularly in light of the changes mandated in the FCC's Lifeline reform order.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

## **DATA RESPONSES**

### **REQUESTS FOR INFORMATION TO TOTAL CALL MOBILE, INC.**

**REQUEST NO. 1** Refer to Total Call's response to Commission Staff's Request for Information to All Parties, Item 1. State whether the response indicates that Total Call is not collecting the Kentucky Universal Service Fund ("KUSF") surcharge. If not, explain why the KUSF Form is not being filed and why collections are not being submitted to the fund.

**RESPONSE:** Total Call is remitting the KUSF surcharge to Kentucky, see Response to Request No. 1 of Commission Staff's Second Request For Information dated June 22, 2016. Total Call understood Item 1 as referenced above to mean the forms to request reimbursement of the KUSF fund. Since Total Call is not yet eligible for KUSF support and therefore had not received any payment from the KUSF fund, Total Call did not provide such forms.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**REQUEST NO. 2** Refer to Total Call's response to Commission Staff's Request for Information to All Parties, Item 6. The response states that Total Call does not pass on the KUSF surcharge to its customers. Instead, Total Call Mobile would remit an amount equal to the surcharge that would otherwise be required of customers. State the amount that has been submitted to the KUSF each year since Total Call became an eligible telecommunications carrier. If not remittances have been submitted to the KUSF fund, explain why they have not been submitted. If remittances have been submitted, provide a copy of the KUSF forms that accompanied the remittances.

**RESPONSE:** Total Call Mobile was authorized to become an eligible telecommunications carrier in July 2015. From July 2015 through June 2016, Total Call has remitted a total of \$240.78 in KUSF surcharges. A copy of each form is attached in Exhibit B.

**RESPONSE PROVIDED BY:** Michael Morrissey, General Counsel

**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.

/s/ Nicholas J. Pieczonka

Nicholas J. Pieczonka