

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

In the Matter of:

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

COMMENTS OF TOTAL CALL MOBILE, INC.

Total Call Mobile, Inc. (“Total Call”) is designated as an eligible telecommunication carrier (“ETC”), and is authorized by the Kentucky Public Service Commission (“Commission”) to receive federal low-income Universal Service Funds. Total Call is currently designated for participation in the Lifeline program, and is currently eligible for reimbursement of \$9.25 per month for federal Lifeline support. Although Total Call does not currently receive the additional \$3.50 available under the Kentucky Universal Service Fund (“KUSF”), Total Call intends to propose an enhanced service plan, which would potentially make Total Call eligible for KUSF support.

Total Call commends the Commission for initiating this investigation to address the solvency of the KUSF. The importance of universal service is well established, and maintaining a solvent KUSF is critical. The Telecommunications Act of 1996 (the “Act” or the “1996 Act”) specifically provides for states to adopt mechanisms that preserve and advance universal service. 47 U.S.C. Sec. 254(f). The KUSF plays a vital part in the Commission’s “primary goal” of “[e]nsuring that quality service is available to all Kentuckians at reasonable rates.” Administrative Case No. 360, *An Inquiry Into Universal Service Funding Issues* (Ky. PSC May, 22, 1998), Order at 1. Total Call looks forward to participating in this proceeding in order to help ensure the KUSF remains solvent and functional.

In its February 1, 2016 Entry, the Commission suggested two potential options for temporarily addressing the solvency of the KUSF while a broader investigation occurs. One option is to temporarily increase the current monthly per-line surcharge from \$.08 to \$.14. The other option is to decrease the KUSF support provided to ETCs from \$3.50 to approximately \$2.00 per line. Total Call believes that the more appropriate option is to increase the current monthly per-line surcharge from \$.08 to \$.14. This slight increase of \$.06 per-line surcharge would be a less drastic change than a \$1.50 decrease in KUSF support. In addition, Total Call intends to provide an enhanced service plan for Kentucky Lifeline subscribers, which would potentially qualify Total Call for KUSF support. If the Commission were to reduce the KUSF support provided to ETCs from \$3.50 to \$2.00 per line, Total Call would have to reevaluate the economics of its potential offering to determine if such an offering is feasible.

Further, Total Call presumes the \$.06 per-line surcharge increase would only be temporary considering that the Commission desires to establish a potential long-term solution in the near future. Imposing a temporary \$.06 increase in the per-line surcharge while a more robust resolution is explored by the Commission is a relatively minor burden when considering the importance of addressing the solvency of the KUSF.

Respectfully submitted,

/s/ Nicholas J. Pieczonka

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing electronic filing is has been submitted to the Commission in paper medium, that the electronic filing was transmitted to the Commission on February 22, 2016, and that no parties have been excused from participation by electronic means in this proceeding.

/s/ Nicholas J. Pieczonka

Nicholas J. Pieczonka