

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of

An Inquiry Into The State  
Service Universal Fund

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No. 2016-00059

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**Response to Commission's  
5/11/20 Requests for Information**

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Telrite Corporation d/b/a Life Wireless ("Telrite") herewith submits its Response to the Commission's 5/11/20 Request for Information. A signed, notarized verification for the Response appears on the following page. The undersigned counsel is responsible for any objection noted for a particular response.

Respectfully submitted,

*/s/ Kathryn A. Eckert*

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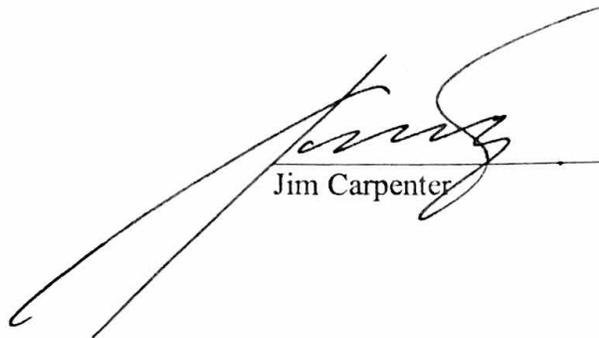
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**VERIFICATION**

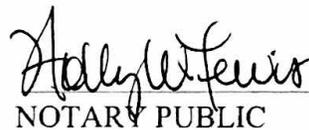
I, Jim Carpenter, President of Life Wireless (assumed name of Telrite Corporation), do hereby verify on behalf of Telrite Corporation, that the statements made in these Responses to the Commission's 5/11/20 Requests for Information are true and accurate to the best of my knowledge.

  
Jim Carpenter

State of Kentucky )  
County of Fayette )

Before me, the undersigned, a duly licensed notary public in and for said county and state, electronically appeared Jim Carpenter, on this 22nd day of May, 2020, who did acknowledge and verify under oath that he freely and voluntarily made the foregoing answers to the Interrogatories, and that they are true and correct to the best of his knowledge and belief.

My Commission expires: August 8, 2022

 #628672  
NOTARY PUBLIC

**Request**

1. State whether the ETC has experienced an increase over the past 45 days in usage of voice minutes and data for Lifeline customers in Kentucky. If so, provide the increase over the monthly usage average.
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**Response**

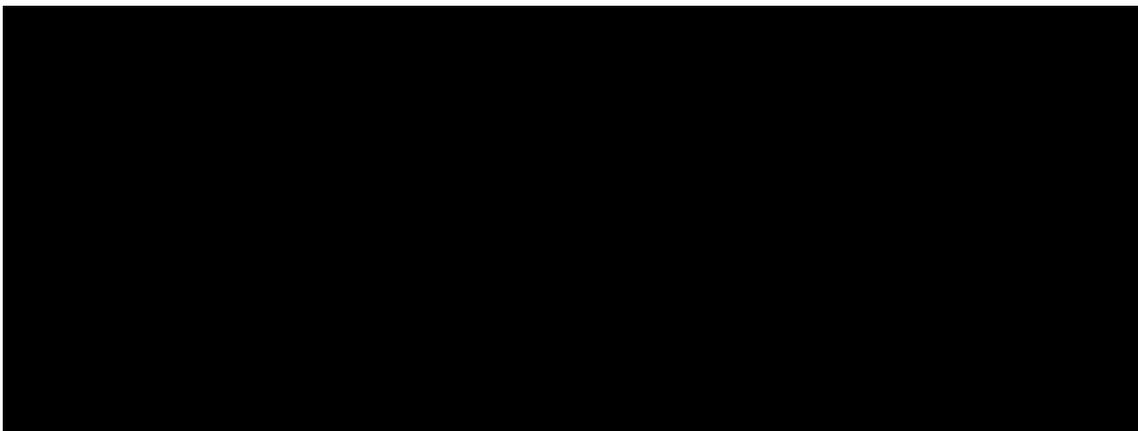
1. Life Wireless (assumed name of Telrite Corporation) has not experienced an increase in usage of voice minutes and data over the past 45 days from its Lifeline customers.

**Request**

2. For January and February 2020, provide the percentage of Lifeline customers that exceeded the monthly 1,000 voice minutes or 3 GB of data. Provide the same information for March and April 2020.
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**Response**

2. The percentage of Life Wireless' Lifeline customers who exceeded 1,000 voice minutes or 3 GB of data for the months in question is represented in the chart below. Confidential treatment for this information is requested from the PSC because it provides sensitive data that can be used by Life Wireless' competitors for an unfair competitive advantage if not afforded confidential treatment.



**Request**

3. State whether the ETC is providing additional minutes and data in response to the current state of emergency. If the ETC is providing the additional services, state when the ETC is planning to cease providing the additional services.
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**Response**

3. Since the state of emergency began, Life Wireless has passed through all additional minutes and data that it has received from its underlying carriers to its Lifeline customers in Kentucky. As such, a portion of Life Wireless' customers received additional data between March 19, 2020 and May 16, 2020. Life Wireless has been and remains committed to passing through additional minutes and data that it receives from its underlying carriers to Life Wireless customers.

**Request**

4. State whether the ETC would be willing to provide unlimited voice in Kentucky if additional reimbursement from the KYSF was made available to the ETC for providing unlimited voice.
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**Response**

4. Life Wireless would be willing to provide unlimited voice in Kentucky for adequate reimbursement. To the extent that unlimited voice in Kentucky is deemed necessary, Life Wireless would request a permanent arrangement versus a short-term arrangement, as a permanent arrangement would bring more certainty to Life Wireless' customers.

**Request**

5. State whether the ETC would be willing to provide additional data in Kentucky if additional reimbursement from the KUSF was made available to the ETC for providing additional data. If so, state the amount of additional data the ETC could provide and the cost to provide the data.
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**Response**

5. Life Wireless would be willing to consider such an arrangement. To the extent that additional data in Kentucky is deemed necessary by the PSC, Life Wireless would request adequate reimbursement for the provision of the additional data that the PSC deems necessary. Life Wireless further requests that the PSC make the provision of any additional reimbursement from the PSC for the provision of additional data permanent, as permanency brings stability to Life Wireless' customers.

**Request**

6. If the ETC provided unlimited voice or increased data, state how soon the ETC could implement the increase in services.
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**Response**

6. Life Wireless did not provide unlimited voice, but did temporarily pass on additional data to a portion of its customer base, as indicated in Response No. 3. If necessary, Life Wireless could implement an increase in services very quickly.

**Request**

7. State whether there is a minimum time the additional temporary KUSF support and Lifeline services should continue to provide a tangible public health benefit.
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**Response**

7. The additional funding should be made as permanent as possible. A temporary arrangement is likely to cause more confusion for Life Wireless' customers than to provide the relief that the PSC is contemplating herein. Other factors weigh in favor of having the additional funding made permanent if at all possible. These include training Life Wireless employees on available plans, developing and maintaining accurate marketing materials. Additionally, Lifeline recipients will become accustomed to a certain level of service and will likely find it difficult to adjust to a more restricted service level afterwards.

**Request**

8. Provide any information regarding this inquiry that will assist the Commission in its inquiry including its experience from other jurisdictions.
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**Response**

8. Life Wireless believes that an important key for success is permanency/stability – ensuring that those in need of Lifeline for voice and data connectivity are able to continue to have access to it for as long as they have that need. Equally important is ensuring that carriers are able to reach people who can benefit from the program. Such factors are even more important during and after the current pandemic due to exponential job loss and economic hardship experienced in all of America, and undoubtedly in Kentucky. The ability for customers to be signed up efficiently is also key for this program to provide the most beneficial impact and assistance. As a result, making improvements to the sign-up process and facilitating a smoother integration with the National Verifier should be points of emphasis for the PSC.