

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

**In the Matter of:**

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

**Case No. 2016-00059**

**RESPONSES TO REQUESTS FOR INFORMATION**

Bluegrass Wireless LLC, Cumberland Cellular Partnership, Kentucky RSA #3 Cellular General Partnership, and Kentucky RSA #4 Cellular General Partnership, all d/b/a Bluegrass Cellular (collectively “Bluegrass Cellular”), by counsel, and for their responses to the requests for information set forth by the Public Service Commission (the “Commission”) in this matter’s orders of May 11 and 21, 2020, state as follows.<sup>1</sup>

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

**ANSWER:** Voice usage has increased approximately 70% in March/April over January/February. Data usage has decreased by 94% in March/April over January/February.

**Responsible Witness:** Robin Fentress.

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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<sup>1</sup> Bluegrass Cellular presents this response pursuant to its pending motion for extension of time, filed May 22, 2020.

**ANSWER:** 0% of Bluegrass Cellular lifeline customers exceeded their allotment of data. 32% of lifeline customers exceeded the 1,000 voice minutes. However, Bluegrass Cellular offers unlimited voice and text to our lifeline subscribers. They incurred no additional fees for voice/text overages.

**Responsible Witness:** Robin Fentress.

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.

**ANSWER:** Bluegrass Cellular offers Lifeline subscribers unlimited voice/text on all plans and offers a variety of choices of data plans which include unlimited data.

**Responsible Witness:** Robin Fentress.

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

**ANSWER:** Bluegrass Cellular's current Lifeline offering already includes unlimited voice.

**Responsible Witness:** Robin Fentress.

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.

**ANSWER:** Bluegrass Cellular offers Lifeline subscribers unlimited voice/text on all plans and offers a variety of choices of data plans which include unlimited data.

**Responsible Witness:** Robin Fentress.

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

**ANSWER:** Bluegrass Cellular offers Lifeline subscribers unlimited voice/text on all plans and offers a variety of choices of data plans which include unlimited data.

**Responsible Witness:** Robin Fentress.

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.

**ANSWER:** Given Bluegrass Cellular's answers to the above, Bluegrass Cellular does not believe that any additional temporary KUSF support and Lifeline services would be required.

**Responsible Witness:** Robin Fentress.

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

**ANSWER:** Bluegrass Cellular has no experience in other jurisdictions and does not believe it has any additional information to assist the Commission. However, Bluegrass Cellular

appreciates the Commission's time and attention to these issues at this extraordinary time in the Commonwealth.

**Responsible Witness:** Robin Fentress.

Respectfully submitted,

/s/ John E. Selent \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 26, 2020, I submitted the foregoing via the Public Service Commission's electronic filing system. I further certify, pursuant to 807 KAR 5:001 Sec. 8 and the Commission's March 24, 2020 order in Case No. 2020-00085, that the foregoing is a true and accurate copy of the retained paper original, which will be submitted to the Commission within 30 days of the Governor lifting the Commonwealth's present state of the emergency.

/s/ John E. Selent  
John E. Selent  
*Counsel for Bluegrass Cellular*