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

Bluegrass Cellular’s Responses to the Commission
Staff’s Initial Requests for Information Upon All Parties
dated April 6, 2016

August 5, 2016

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

Bluegrass Cellular’s Responses to the Commission
Staff’s Initial Requests for Information
Upon All Parties dated April 6, 2016

FILED: August 5, 2016

1 Bluegrass Wireless, LLC; Cumberland Cellular Partnership; Kentucky RSA #3 Cellular General Partnership; Kentucky RSA #4 Cellular General Partnership (collectively, “Bluegrass Cellular”).
BLUEGRASS CELLULAR'S RESPONSES TO THE COMMISSION'S
REQUESTS FOR INFORMATION TO ALL PARTIES

Item 1) Provide the KUSF reimbursement forms submitted to the Commission and the
Department of Finance and Administration from January 2014 to the present.

Response) Please see the KUSF reimbursement forms submitted to the Commission and the
Department of Finance and Administration by Bluegrass Cellular attached as Exhibits 1-4 to
Bluegrass Cellular’s Responses to the Commission Staff’s Initial Requests for Information Upon
those Parties Receiving Support from the KUSF.

Bluegrass Wireless, LLC ceased providing wireless service in March 2015. Thus,
Bluegrass Wireless, LLC did not file KUSF reimbursement forms after March 2015.
Accordingly, Bluegrass Wireless, LLC has provided its KUSF reimbursement forms from
January 2014 to March 2015.

Witness) Elizabeth Love
Item 2) Explain how the total number of subscriber lines is calculated for the KUSF reimbursement form when a new customer receives service in the middle of a month.

Response) Bluegrass Cellular states that the total number of subscriber lines reported on the KUSF reimbursement form is calculated using the number of customers receiving Lifeline support on the last day of each month.

Witness) Elizabeth Love
Item 3) Explain how the total number of subscriber lines is calculated for the KUSF reimbursement form when a customer leaves in the middle of a month.

Response) Please see the Response to Request No. 2 of the Commission Staff’s Initial Requests for Information Upon All Parties.

Witness) Elizabeth Love
Item 4) 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) Bluegrass Cellular states that when a bad debt is experienced it remits the full amount of the KUSF surcharge billed to the customer.

Witness) Elizabeth Love
Item 5) State whether you believe the Commission should wait until the FCC’s investigation of Lifeline Reform is concluded before rendering a decision in this proceeding, and explain the basis for your response.

Response) Bluegrass Cellular believes the Commission should wait until the FCC’s investigation of Lifeline Reform is concluded before it renders its decision in this proceeding because the eventual reforms made by the FCC may impact how the Commission decides to administer the KUSF. Waiting to ensure that the KUSF reforms comport with and work with the reforms to the federal Lifeline program could avoid the Commission having to again reform the KUSF after the Lifeline Reform is concluded. While the Commission may have valid concerns about possible fraud or mismanagement of the Lifeline program, introducing a state-specific plan that may contradict the reforms to the federal Lifeline program or add to the work required in administering the plan would prove a hardship on the companies that are not in violation of the Lifeline rules.

Witness) Elizabeth Love
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Item 6) State how soon upon the issuance of an Order by the Commission changing the
KUSF surcharge that you are or anticipate being able to implement the changes on customer
bills. If it differs by type of account, provide the information for each type of account, along
with the number of access lines for each account type.

Response) Subject to any applicable regulatory requirements, Bluegrass Cellular anticipates
it could implement the changes on its customer bills within sixty (60) days.

Witness) Elizabeth Love
CERTIFICATION

I hereby certify that I have supervised the preparation of the responses on behalf of Bluegrass Wireless, LLC, Cumberland Cellular Partnership, Kentucky RSA #3 Cellular General Partnership, and Kentucky RSA #4 Cellular General Partnership to the Initial Requests for Information of the Commission Staff upon All Parties, and that the responses contained herein are true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

Elizabeth Love
Controller
Bluegrass Wireless, LLC; Cumberland Cellular Partnership; Kentucky RSA #3 Cellular General Partnership; Kentucky RSA #4 Cellular General Partnership

Date: 08/05/16

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